

Delegated Report

Scoping Opinion Application

Planning Application No:	20250900
Location:	Land North of Camer Road, Meopham, Gravesend
Description:	Request for a scoping opinion in accordance with The Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 in respect of an EIA Scoping Opinion in relation to proposals for the redevelopment of Land North of Camer Road, Meopham.
Applicant:	C/O Agent
Site Visit Date:	Desktop assessment

Submitted Documents/Plans

EIA Scoping Report (September 2025);
Appendix A2 Structure of ES Chapter; and
Appendix A3 Representative Viewpoint Locations.

Relevant Planning History

There is no relevant planning history.

Site Description

The site extends to approximately 43.67 hectares (ha) and is located to the east of Hook Green and to the southwest of Sole Street. It is bordered by the Chatham Main Line to the north, Camer Road to the southeast, and Norwood Lane to the southwest.

The site, which sits within the Green Belt and in the Meopham Downs Landscape Character Area, comprises agricultural land with two areas of woodland located within the centre of the site. A residential property, with an associated small stable block and pastoral field, are located within the western section of the site. There is a Public Right of Way (PRoW) (NS192) running through the site connecting the north and southwest boundaries. This PRoW connects Manor Road / Sallows Shaw with Norwood Lane and Wrotham Road (A227).

Proposed Development

The design of the proposed development has not been finalised; however for the purpose of this Scoping Opinion the development is proposed to comprise:

- Construction of up to 730 residential units (Use Class C3);
- Land reserved for a two-form entry primary school and associated sports pitches (Use Class F1);
- Substantial areas of public open space throughout the Site, along with recreational features, including play areas, outdoor gyms and sports pitches and play hubs;

- Implementation of landscape measures, including tree planting will be implemented. Where possible, existing vegetation including the existing areas of woodland within the centre of the Site will be retained;
- Vehicular access from Camer Road will be retained and enhanced. An emergency vehicular / bus access will also be provided off Camer Road, located at the southern part of the Site. A bus route will be provided between these two access points.
- The existing PRoW (NS192) that crosses the Site will be retained, and active travel routes will be provided throughout the Site. Access travel points will be provided off Camer Road and Norwood Lane.

Parking (including car, cycle and Electric Vehicle (EV)) will be informed by KCC policy standards and full details on the access and parking arrangements will be provided within the Transport Assessment (TA) submitted as part of the planning application.

The proposed development would range in heights and massing. Height and massing have not been finalised but are anticipated that they could come forward within a range of between one and three storeys, with a maximum height of 14m.

Consultations, Publicity and Representations

External Consultees

Environment Agency

Due to the high volume of work, we are unable to provide comments on Environmental Impact Assessment Scoping Reports at the present time, with the exception of proposals within 20 metres of a main river and those under the Nationally Significant Infrastructure Project; Highways Act and Transport and Works regimes.

A handbook for Scoping Projects can be accessed on the following weblink:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296...

The attached guidance also contains our local standard preliminary advice for development proposals which can be shared with the applicant.

Note to the applicant

We are able to provide detailed and bespoke advice and answer technical questions for a charged fee which equates to £115 per hour plus VAT. We can explain this service and provide you with a bespoke quote for further pre-application advice that you may require. If you are interested in finding out more about this service, please email:

kslplanning@environment-agency.gov.uk

Historic England

This development could, potentially, have an impact upon a number of designated heritage assets in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

There are no listed buildings or scheduled ancient monuments within the site boundary but the site forms part of the wider setting of several designated heritage assets. Accordingly, we consider that the effects of development proposals are mainly related to potential impact on their significance through change of their setting. On this basis, we consider that, besides archaeology, the built heritage should be also scoped in for the EIA process. It should, therefore added, among the topics to be assessed listed in the Icenia EIA

Scoping Report (September 2025).

The main designated heritage assets within 500m of the proposed development include the following:

- Hook Green Conservation Area
- Waterditch (Grade II) (LEN: 1039914)
- Nevill House (Grade II) (LEN: 1096350)
- The White House (Grade II) (LEN: 1096349)
- Mulberry House (Grade II) (LEN: 1039911)
- Hook Green Farmhouse (Grade II) (LEN: 1350238)
- The Old Forge The Old Forge Cottage (Grade II) (LEN: 1367140)
- Evenden Farmhouse (Grade II) (LEN: 1096354)
- Camer Green Cottage (Grade II) (LEN: 1372283)
- 9 And 10, Camer Street (Grade II) (LEN: 1096345)
- Somers (Grade II) (LEN: 1350235)
- 5 And 6, Camer Street (Grade II) (LEN: 1096344)
- Bower Cottage (Grade II) (LEN: 1096313)
- Yeomans House (Grade II) (LEN: 1095063)
- Sole Street House (Grade II) (LEN: 1067728)
- Camer House (Grade II) (LEN: 1052357)
- Bailiffs House (Grade II) (LEN: 1052333)
- Building Approximately 30 Metres To West Of Camer House (Grade II) (LEN: 1350234)
- Norwood Farmhouse (Grade II) (LEN: 1039912)

It is important that the Environmental Statement is designed to ensure that all impacts are fully understood. In order to achieve this, the EIA should include a comprehensive Heritage Assessment devised as a separate document from the Landscape Visual Impact Assessment, due to the distinct content and purpose of the two reports.

We would also expect the Environmental Statement to consider the potential impacts on any other non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

With regard to potential impact on archaeology, the site is located within two different Archaeological Notification Areas designated for their Medium Palaeolithic potential and as areas of multi-period background potential.

We note that a Desk-Based Assessment and a geophysical survey (GS) will be undertaken to further assess the potential for previously unknown archaeological deposits. The programme for the GS will be agreed with the Archaeological Advisory Team to GBC via a Written Scheme of Investigation and a method statement, including a specification for works. If significant archaeology is recorded during the geophysical survey, a trial trench evaluation may also be required, and/or clear options for post-determination flexibility in layout/design for preservation in situ and/or recording.

The Environmental Chapter should include the reports and results of these investigations as appendices.

The assessment should take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits.

We would strongly recommend that you involve your own conservation officers and the archaeological staff in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

KCC Biodiversity

The submitted scoping report has detailed the following ecological surveys are being carried out and will be submitted as part of the planning application:

- Preliminary Ecological Appraisal
- Biodiversity Net Gain Assessment
- Bat Activity Surveys
- Preliminary Roost Assessment of buildings and trees
- Breeding Bird Surveys
- Dormouse Surveys
- Reptile Surveys
- GCN HSI assessments on any ponds in the site /surrounding area.
- Badger Survey
- Consideration of potential to support water voles, hedgehogs and invertebrates.

We are satisfied that the range of surveys/assessments to be carried out will adequately assess the ecological interest of the site.

We advise that the following must be submitted as part of any Environmental Impact Assessment which is submitted:

- Ecological Impact Assessment – the EclA must be informed by the results of other consultants reports e.g. noise / air quality.
- Plans demonstrating that the mitigation proposed within the EclA can be implemented within the site
- Biodiversity Net Gain Assessment – must demonstrate that it has followed the mitigation hierarchy. If the submitted information details that a minimum of 10%
- BNG can be achieved for area and linear features the submitted plans must demonstrate it is achievable.
- Ecological enhancement plan demonstrating the minimum number of enhancement features to be incorporated in to the site and buildings.
- Outline lighting strategy
- Outline management plan.

KCC Flood and Water Management

Kent County Council, as the Lead Local Flood Authority (LLFA), has reviewed the EIA Scoping Report (September 2025) and understands that a Flood Risk Assessment and Drainage Strategy will be prepared alongside any Environmental Statement. The LLFA agrees that groundwater protection and appropriate surface water management are essential on site and should be thoroughly considered moving forward.

In developing the drainage strategy, we would highlight that DEFRA published the National Standards for Sustainable Drainage Systems in June 2025. The LLFA is now actively applying these latest standards, with each new major development being assessed against them.

KCC Heritage

I can confirm that it would be appropriate for archaeology and heritage to be 'scoped in' for the EIA process and that the process set out in Chapter 10 of the Icenii EIA Scoping Report would be appropriate, as would the model structure of the ES chapter.

Separately I have approved a Written Scheme of Investigation for a geophysical survey of the site, which I understand will be undertaken in the next weeks.

KCC Highways

I have the following comments to make with respect to highway matters:

The applicant should provide a Transport Assessment (TA) in support of any future planning application.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links

to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

KCC Public Health

Thank you for reaching out and inviting comments and feedback on the Camer Road application. Given the short timeframe, I've outlined the following key recommendations:

- Health Data Accuracy: Please ensure the health data presented in the report reflects the most current information available. The Fingertips tool [Fingertips | Department of Health and Social Care](#) is a useful resource for this.
- Human Health: It would be beneficial to incorporate mental and physical health considerations for neighbouring residents during the construction phases, as well as assess the potential health impacts on both new and existing residents following the completion of the development.
- Active Travel England Consultation: As the application involves a school, I recommend consulting with Active Travel England to ensure alignment with their guidance and priorities.

Additionally, I've compiled a selection of strategies and guidance documents that may be helpful for further exploration. These resources are relevant to health in planning and offer useful context for assessing potential impacts:

Guide for scoping human health within the environment impact assessment
[iema-eia-guide-to-effective-scoping-of-human-health-nov-2022.pdf](#) Section 3 covers presenting health in EIA scoping.

Gravesham's Sport, Leisure & Recreation policy.
[Sport Leisure and Active Recreation Strategy 2022-27](#) Local Picture & Local Priorities, *open space, sports & recreation* to ensure strategic alignment.

Building for a Healthy Life is a toolkit for designing healthy neighbourhoods, streets, homes and public spaces and may provide some insight.
[BFL-2020-Brochure.pdf](#)

And Sport England have an Active Design guide for creating active environments through planning and design.
[Active Design](#)

Kent Downs National Landscape

On 22 November 2023, all designated Areas of Outstanding Beauty (AONBs) in England and Wales were renamed 'National Landscapes' (NLs). Accordingly, the Kent Downs AONB is now the Kent Downs National Landscape. Its legal designation and policy status remain the same.

Also of note is the changes introduced through the Levelling-Up and Regeneration Act 2023, which came into force on 26/December 2023. The Act amends the Countryside and Rights of Way Act, which is the primary legislation relating to AONBs and replaces the previous Duty of Regard to AONBs set out at S85 with a new, strengthened requirement that:

'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'.

(Part 12 - Miscellaneous; Section 245. Protected Landscapes; paras (5) - (10).

This clearly places a much stronger duty on relevant authorities, which includes local authorities, to ensure that their actions and decisions seek to conserve and enhance AONBs, marking a significant change to the legal context of AONB policy.

Further advice is provided in Appendix 2.

The KDNL team agrees that the proposal comprises EIA development and that an LVIA should be scoped into the EIA for both construction and operational effects.

We welcome the inclusion of the KDNL as a receptor, given the scale of the proposal and the site's proximity to the Kent Downs.

We agree that it would be appropriate to scope NCA 119- North Downs out of the ES.

We are concerned about the intention to scope out night-time effects to the KDNL. The application is for a significant scale of development and will inevitably involve the provision of street lighting. The application also includes the provision of a number of sports pitches, both associated with the school and for other recreational activities. It is not known whether the sports pitches would be floodlit or where they would be located within the site, relative the KDNL boundary. Given the current baseline situation, with the vast majority of site containing no lighting source, it is considered inappropriate to scope out night-time effects on the KDNL from the ES, given that tranquillity, including dark night skies, is identified as one of its special qualities.

We note the Assessment is intended to be undertaken for construction and year 1 in winter and at Year 15 in summer. We consider it would be helpful to also include an assessment at year 15 operation in winter.

We welcome the intention to include wireline or massing model photomontages within the LVIA (Type 3) and the inclusion of one of these from within the KDNL. In respect of proposed viewpoint locations, it would have been helpful for a ZTV to be included to aid a desktop assessment of the suitability of the viewpoint locations that are proposed.

Relevant Kent Downs National Landscape publications which may be helpful in informing the assessment include the Kent Downs Position Statements on Setting, our Colour Guidance and Landscape Design Handbook and the adopted Management Plan, 2021 - 2026. In addition, the KDNL Landscape Character Assessment Update, 2020 should be referenced in the LVIA.

Kent Police

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

Dwellings

1. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that residents will not suffer from possible noise pollution, in particular the green spaces surrounding the site, any parking areas/ courts and pedestrian routes. These areas must be well lit and covered by natural surveillance from neighbouring properties.
2. Perimeter, boundary and divisional treatments must be a minimum of 1.8m in height. Any alleyways to have secure side gates, which are lockable from both sides, located flush to the front building line.
3. To meet SBD guidance we would strongly recommend the installation of pavements on both sides of the roads to avoid vehicle and pedestrian conflict and promote safer spaces for families. It is now common practice to have some shared vehicle/ pedestrian areas on secondary routes. If pavements cannot be installed in these shared spaces, we strongly recommend traffic calming measures, especially where there is a curvature in the road.
4. Parking - To help address vehicle crime, security should be provided for Motorbikes, Mopeds, Electric bikes and similar. SBD or sold secure ground or wall anchors can help provide this. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an "active" window e.g. lounge or kitchen and sufficient lighting – the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse. If car ports are unavoidable, we recommend they be lit and painted in a light colour to optimize surveillance opportunities. For car parks, we recommend the Safer Parking Scheme, which follows CPTED guidance from both the police and the British Parking Association.
5. Pre-existing and new trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.
6. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Residential (Homes) 2025 Guide states: "19.3 SBD does not advocate the use of bollard lighting to achieve lighting uniformity. Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It should be avoided, as it can increase the fear of crime, because it does not project sufficient light at the right height to recognise facial features." Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.
7. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors and individual flat entrance doors to meet PAS 24: 2022 UKAS certified standard, STS 201 (certified to PAS 24:2022) or LPS 2081 Issue 1 Security Rating B+. Please note PAS 24 is a minimum-security standard, and communal doors may require a higher standard, such as STS or LPS.
8. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2022 UKAS certified standard, STS 204 (certified to PAS 24:2022) or LPS 2081 Issue 1 Security Rating A, STS 222 Issue 4 Burglar Resistance, LPS 1175 Issue 8 Security Rating A1, STS 202 Issue 12 Burglar Resistance BR1 or LPS 1673 Issue 1 Attack Rating AR.A60. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.
9. We advise on the use of ground/ wall SBD or sold secure anchors within a cycle storage area/ sheds of dwellings to deter bicycle theft.
10. Mail delivery to meet SBD TS008 with a fire guard are strongly recommended for dwellings. For buildings with multiple occupants we recommend TS009 standards. Please note we advise against trade buttons, if mail is to be delivered inside a lobby there must be an airlock/ access-controlled door to prevent access further into the building for anyone other than residents.
11. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.
12. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.

13. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.
14. CCTV is advised for all communal entry points and to cover the mail delivery area.
15. Defensible spaces. Corner properties require well established boundaries to avoid desire lines across front gardens. This can be provided by using hedges or knee rails/ fences, for example.
16. Blank Walls. It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces. This type of elevation tends to attract graffiti, inappropriate loitering, and ball games. The provision of a 1m buffer zone using either a 1.2 – 1.4m railing or a 1m mature height hedge with high thorn content should address those issues.
17. Vehicle mitigation may be required on pedestrian routes, to prevent mopeds or similar vehicles accessing the area and causing nuisance.
18. Open space. Open space areas must be well lit and boundaries must be clearly defined to avoid conflict or ball games causing nuisance. For any LAP or LEAP, we recommend fencing at a minimum height of 1.2m and vandal resistant play equipment. Consideration should be given to a single dedicated entry and exit point to enable adult control/supervision.
19. Community areas/ gardens will also require more natural surveillance, appropriate boundary treatments and access control as they generally attract Crime, ASB and nuisance. It is also advised that tools and equipment that are either of high value, or can be used to commit an offence are either not left overnight or secured in lockable storage areas.
20. Public Footpaths should be at least 3 metres wide to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles and mobility vehicles. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people.
21. Planting. We would recommend dense / prickly planting to ensure individuals stay on pedestrian routes, and do not create desire lines. or spaces where potential offenders can hide from view.

Primary School

22. We recommend the use of the Secured By Design (SBD) principles for this proposal to show commitment to crime prevention and community safety.
23. For doorsets and windows, please refer to SBD New Schools 2014 guide for recognised security standards products of a Police preferred specification.
24. Vehicle mitigation barriers are recommended for wide pedestrian areas and near the main entrance to avoid conflict and to safeguard pedestrians.
25. SBD prefers one entrance area at the perimeter of the site serving both vehicles and pedestrians or separate entrances that are located in close proximity to one another to aid mutual supervision. The entrance should be gated and when the school is closed and unoccupied, the gates must be locked. Access control of these gates is essential, and a full audio-visual access control system should be installed. CCTV coverage to monitor access and egress.
26. Formal recreation spaces such as multi-use games areas and external all-weather sport facilities may encourage trespass outside of normal school hours. Perimeter security is paramount as previously discussed.
27. Secure storage for play and sports equipment, including seasonal storage for goalposts etc, should, where possible, be provided within the main building, with ready secured access from outside.
28. Regarding renting out facilities or community use, the layout of the building must allow visitors access to be restricted to those areas only preventing any further access. Door access control may be required.
29. From a security and child safety aspect, we recommend that all fire exits are alarmed to alert staff should these be opened.
30. A security alarm system should be installed and utilized when the building is not in use.
31. Landscaping. Trees should be pruned so that they do not provide climbing aids, which may compromise the secure boundary.
32. Waste bins should be kept in a secure enclosure, ideally away from the building as bins can be used as a means to commit crime, be a climbing aid or even an arson hazard.
33. Lighting. Appropriate lighting will be required. Please refer to the SBD guide.
34. We recommend CCTV coverage of the main entrances/exits and remote areas that tend to be unsupervised due to the lack of natural surveillance and can potentially attract antisocial gathering.

35. Secure cycle racks are required as previously discussed, and ideally covered by CCTV to prevent cycle theft. We strongly advise SBD and Sold Secure standard certified cycle storage that has passed testing as they offer additional security. In addition, we advise the inclusion of SBD and Sold Secure standard certified wall or ground anchors.

Associated Sports Pitches;

36. Defined pedestrian routes to/ from the facility are recommended to improve safety and avoid pedestrian and vehicle conflict.

37. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the Institution of Lighting Professionals), particularly where a lighting condition is imposed, to help avoid conflict and light pollution.

If floodlights are proposed;

If I refer to **section 27** (Private external lighting) of Secured By Design Residential (Homes) Guide 2025,

27.8 Secured by Design encourages, wherever possible, the use of the most environmentally friendly light sources. The Institute of Lighting Professionals (ILP) currently favours the use of good quality LED lighting and other energy effective light sources and advises against the use of fluorescent lighting which is environmentally unsustainable for a variety of reasons.

38. If CCTV is proposed for this area, we recommend this to cover access points to the facility, any areas with limited natural surveillance and any storage areas containing high-value equipment. Please ensure the CCTV supports the lighting plan.

39. If perimeter fencing is proposed around the associated sports pitches, we recommend this to be a minimum of 2m high. In addition to this, the gates must be secure, which are lockable from both sides.

40. We recommend the associated sports pitches to be located in an area with maximal natural surveillance to reduce the likelihood of ASB and other types of crime occurring within the facility.

41. Any sports equipment should be securely stored when not in use.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

KCC Public Rights of Way

I am pleased to note that the existence of public footpath NS192, which crosses the site, and the surrounding public rights of way network has been identified as a concern.

NS192 currently crosses the site and links the settlements of Sole Street and Hook Green, as a rural and traffic free route and, should the development go ahead, consideration should be given to how this rural and quiet nature can be retained to the highest degree, preferably by utilising a 'green corridor' through the middle of the development and maintaining the current alignment as a direct link.

Connectivity with the surrounding network from NS192 is not the best and there would be opportunities to improve this situation by the inclusion of additional access routes with the site that would allow new and existing residents to directly access the surrounding network.

HSE

Thank you for your request for consultation under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Scoping opinion 20250900 dated 16th September 2025 for the above proposed development.

Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Regulation 4(4)- the vulnerability of the proposed development to major accidents relevant to the development HSE's response is limited to our role in the land use planning system for the control of major industrial hazards involving hazardous substances. HSE is not responding in our regulatory role in the health and safety system.

1. The proposed development is not of a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Planning (Hazardous Substances) Regulations 2015.
2. The proposed development is not located within a safeguarding zone of an Explosives site licensed under the Explosives regulations 2014 or the Dangerous goods in harbour area regulations 2016.
3. The development is not located within HSE's land-use-planning consultation zones for major-accident-hazard pipelines and hazardous substances consented sites (licensed explosives sites are covered in the previous paragraph).

Due to the above 3 points, at present there appears to be no need to consult HSE Land Use Planning.

4. If there is a major accident hazard establishment with no HSE consultation zones, in the vicinity of the proposed development, and you are concerned that the proposed development might increase the risk or consequences of a major accident at the existing establishment then please directly consult the operator of the establishment, as appropriate.

5. General health and safety at work

HSE realises that Environmental Risk Assessments are not expected to include general health and safety at work however we take this opportunity to point out that it may be beneficial for employer(s) to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on environmental assessment, natural environment and climate change.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Internal Consultees

Environmental Protection

The submitted EIA Scoping Report and application details have been reviewed. Air quality and noise have been scoped in and contaminated land has been scoped out of the EIA. This is agreed with.

For air quality, both construction and operational phase impact will be assessed in accordance with IAQM guidance. The applicant should also refer to the Kent & Medway Air Quality Partnership Technical Guidance on Planning and Air Quality.

The proposed methodology for the noise chapter is acceptable. It will be expected that internal noise levels as well as noise levels in external amenity areas will comply with the levels in BS8233/WHO guidance. Overheating should be considered if noise levels can't be achieved with openable windows.

With regards to contamination, although scoped out, section 14.18 advises that a geo-technical report will be submitted with any application. As the site has been in agricultural use, any testing should include testing for pesticide/herbicide residue, particularly in any garden areas or communal soft landscaped areas.

Officer's Analysis

Environmental Impact Assessment Regulations

The proposed development would fall within Category 10(b) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), which applies to urban development projects. The thresholds for such developments that could require an EIA are as follows:

- “(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.”

The proposed development exceeds threshold (ii) and (iii), as it will include more than 150 dwellings (up to 730 dwellings) and exceeds 5ha of developable land (43.67ha). The applicant has not requested a formal EIA screening opinion but has instead committed to undertaking an EIA for the site and submitting an Environmental Statement (ES) with a planning application.

This application comprises a request for a Scoping Opinion submitted in accordance with Regulation 15 of the EIA Regulations to determine the scope and level of detail required for an EIA for the proposed development. The request is accompanied by the EIA Scoping Report (September 2025).

In line with the EIA Regulations, this report identifies the site location, the nature and purpose of the proposed development (including its location and technical capacity) and the likely significant effects on people and the environment. This report also outlines the proposed approach, methodology and scope of the ES. The ES will present an assessment of the likely significant effects of the proposed development associated with construction works and once it is completed and operational.

Part 4 (15) (2) of the EIA Regulations requires that any request for a Scoping Opinion must include:

(a) In relation to an application for planning permission -

- (i) a plan sufficient to identify the land;
- (ii) a brief description of the nature and purpose of the development, including its location and technical capacity;
- (iii) an explanation of the likely significant effects of the development on the environment; and
- (iv) such other information or representations as the person making the request may wish to provide or make.

The submitted report responds to Part 4 (15) (2) of the Regulations and the request is therefore compliant with the Regulations in this respect.

Regulation 4 (2) of the EIA Regulations specifies the factors likely to be significantly affected by the development. The ES must include the information referred to in Regulation 4 (2) and should include such information as is reasonably required to assess the environmental effects of the development and to which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile.

In this instance, the level of detail of the proposed development provided is limited to the red line boundary and a description of the main elements. This Scoping Opinion relates to the information provided in the EIA Scoping Report and the responses received from consultees only. Some aspects may need to be revisited as the scheme progresses towards submission.

The principal purpose of an ES is to report the findings of the EIA on the significant effects of an EIA development on its receiving environment.

The Scoping Report provides a basis and framework for assessing the overall environmental effects of the development. This response is structured around the sub-headings presented in the Scoping Report informed by input from statutory and non-statutory consultees. In addition to the summarised comments from the consultees above, the full responses received can be found here: [Gravesham B C ****LIVE****](#) and should be reviewed alongside this Scoping Opinion.

Likely Environmental Effects

The assessment of likely significant effects in the ES will set out the effects associated with the construction works and once the proposed development is completed and operational.

The table below outlines a summary of the topics to be scoped into the EIA:

Topic	Construction Phase Effects	Operational Phase Effects	Likely Significant Effects (Pre-Mitigation)	Scoping Status
Socio-Economics	✓ - T	✓ - P	✓	Scoped In
Transport and Access	✓ - T	✓ - P	✓	
Air Quality	✓ - T	✓ - P	✓	
Noise and Vibration	✓ - T	✓ - P	✓	
Hydrology, Flood Risk and Drainage	✓ - T	✓ - P	✓	
Archaeology	✓ - P	×	✓	
Ecology	✓ - P	✓ - P	✓	
Landscape and Visual Impact Assessment (LVIA)	✓ - T	✓ - P	✓	

Topics not included in the scope of the EIA are:

Built Heritage	×	×	×	Scoped Out
Daylight, Sunlight and Overshadowing	×	×	×	
Wind Microclimate	×	×	×	
Human Health	×	×	×	
Major Accidents and Disasters	×	×	×	
Energy and Sustainability	×	×	×	
Waste	×	×	×	
Ground Conditions and Contamination	×	×	×	
Agricultural Land	×	×	×	
Arboriculture	×	×	×	
Climate Change	×	×	×	

Socio-Economics

The main socio-economic impacts will be linked to the provision of housing. There will also be direct and indirect employment opportunities during the construction phase, plus economic benefits due to an increase in private sector investment in the area will contribute to Gross Value Added (GVA).

The likely significant effects identified for the construction works for assessment in the ES are as follows:

Receptor	Effects	Scoped In
Local Labour Market	Temporary direct and indirect construction employment will be generated. This will create positive economic impacts including the generation of GVA in the WIA. There will also be multiplier effects generated from the supply chain and the spending into the local economy.	✓
Local Economy	Temporary construction injection of capital in the WIA	✓

The effects for the operational phase are as follows:

The local housing market and people requiring housing in the LIA.	Housing stocks are susceptible to changes in demand/supply and there is currently significant affordable housing need. As such, there is potential for long-term, permanent significant effect of an increase to housing against Gravesham housing targets.	✓
Local labour market	The new residential population will increase the labour supply, and the provision of employment land will increase employment opportunities within the LIA and WIA.	✓
Local economy	The introduction of new households will permanently increase residential spend within the LIA.	✓
Local education facilities at the relevant school catchment area (early years, primary school, and secondary school)	Existing education facilities would be susceptible to changes in population. As such, there is potential for long-term, permanent significant effects on the LIA and WIA if there is insufficient capacity from the housing element which is not mitigated.	✓
Local healthcare facilities (GP Facilities) in the relevant GP catchment area	The permanent effect that the changes in the population will have on GP facilities' capacity within the LIA.	✓
Surrounding open spaces, play spaces and sports facilities	There is a wide range of open spaces (including play space and sports facilities) within the LIA which will be susceptible to changes in population.	✓
Local community facilities (libraries, youth centres and community centres)	Existing community facilities would be sensitive to changes in population. As such, there is potential for long-term, permanent significant effects on the LIA and WIA, if there is insufficient capacity which is not mitigated.	✓

The significance of each of these overall socio-economic effects will be assessed, considering deprivation, local unemployment levels, economic activity rates, and housing needs. Where significant adverse effects

are identified, appropriate mitigation measures to address any significant adverse effects will be included.

In relation to the cumulative impacts of the proposed development with other commitments and proposed developments, this would be agreed with GBC's Policy team outside of the application process.

A Health Impact Assessment will also be undertaken to assess the likely effects of the proposed development on health outcomes. KCC Public Health have commented that the health data presented in the report should reflect the most current information available. The Fingertips tool is a useful resource for this. It would be beneficial to incorporate mental and physical health considerations for neighbouring residents during the construction phases, as well as assess the potential health impacts on both new and existing residents following the completion of the development.

Transport and Access

With consideration of the environmental characteristics of the site and anticipated construction activities the potential effects for assessment in the ES are set out below:

During Construction:

Receptor	Effects	Scoped In
Existing residents	Noise and vibration impacts on existing properties due to construction HGVs; severance effects on existing communities; risks from hazardous loads; dust and dirt impacts	✓
Existing residents	Effects on existing communities from increases in construction traffic volumes	✓
Existing business employees	Noise and vibration impacts on existing properties due to construction HGVs; severance effects on existing communities; risks from hazardous loads; dust and dirt impacts	✓
Highway Network	Net change in traffic patterns during construction; daily link flows; traffic speed; effect on personal injury accidents, driver delay¹³	✓
Pedestrians and Cyclists	Net change in traffic during construction and resulting effects on severance, delay, fear and intimidation and amenity for pedestrians and cyclists. Effect on personal injury collisions.	✓

Completed Development:

Existing residents	Severance effects on existing communities	✓
Existing residents	Effects on existing communities from increases in traffic volumes	✓
Existing business employees	Severance effects on existing communities	✓
Highway Network	Net change in traffic patterns during operation daily link flows; traffic speed; effect on personal injury collisions, driver delay¹⁴	✓
Pedestrians and Cyclists	Net change in traffic during operation and resulting effects on severance, delay, fear and intimidation and amenity for pedestrians and cyclists. Effect on personal injury collisions.	✓

There are no non-significant effects anticipated for the Transport and Access assessment.

KCC Highways have not commented on any specific aspect of the EIA Scoping Report but have stated that the applicant should provide a Transport Assessment (TA) in support of any future planning application.

With regard to public footpath NS192, KCC PRoW have stated that as a rural and traffic free route, should the development go ahead, consideration should be given to how this rural and quiet nature can be retained to the highest degree, preferably by utilising a 'green corridor' through the middle of the development and maintaining the current alignment as a direct link. Connectivity with the surrounding network from NS192 is not the best and there would be opportunities to improve this situation by the inclusion of additional access routes with the site that would allow new and existing residents to directly access the surrounding network.

Air Quality

The site is located in an area where air quality is mainly influenced by road transport using Norwood Lane and Camer Road.

The likely significant effects identified for the construction works for assessment in the ES are as follows:

Receptor	Effects	Scoped In
Human (e.g. existing residential dwellings, schools, hospitals, care homes)	- Potential temporary increase in dust generated by on-site activities during the construction phase of the Proposed Development. - Potential increase in particulate matter (as PM₁₀) concentrations generated by on-site activities during the site preparation, earthworks and construction phase of the Proposed Development. - Potential increase in air pollutants (NO₂, PM₁₀ and PM_{2.5}) generated from construction plant and vehicle exhaust emissions during the site preparation, earthworks and construction phase of the Proposed Development.	✓

The likely significant effects for the completed development are as follows:

Human (e.g. existing residential dwellings, schools, hospitals, care homes)	- Potential change in pollutant concentrations (notably NO₂, PM₁₀ and PM_{2.5}) due to exhaust emissions from road traffic generated during the operational phase of the Proposed Development. - Exposure of future occupants to pollutant concentrations (notably NO₂, PM₁₀ and PM_{2.5}) and the suitability of the Site for its proposed end use will be considered.	✓
Ecological	Potential change in pollutant concentrations (notably Oxides of Nitrogen) due to exhaust emissions from road traffic generated during the operational phase of the Proposed Development.	✓

Non-significant effects proposed to be scoped out are as follows:

Receptor	Effects	Scoped In
Ecological	Potential temporary increase in dust generated by on-site activities during the construction phase of the Proposed Development.	X
Human	- Emissions from industrial sources on local air quality - Emissions from rail sources on local air quality	X

The Council's Environmental Protection team agree that air quality and noise are scoped in and contaminated land has been scoped out of the EIA.

For air quality, both construction and operational phase impact will be assessed in accordance with IAQM guidance. The applicant should also refer to the Kent & Medway Air Quality Partnership Technical Guidance on Planning and Air Quality.

Noise and Vibration

The current typical ambient noise environment is dominated by road traffic on the surrounding road network and rail traffic.

The potential significant effects identified for construction works for assessment in the ES are as follows:

Receptor	Effects	Scoped In
Surrounding residential receptors	Noise and vibration generated during typical construction activities at the Site.	✓

The potential significant effects for the operational phase for assessment in the ES are as follows:

Receptor	Effects	Scoped In
Existing residential dwellings	Changes in noise levels at existing road links due to changes in local traffic flows	✓
Proposed residential receptors	Ambient noise at proposed residential use, in relation to the noise environment	✓

There are no certain non-significant effects for the Noise and Vibration Chapter.

The Council's Environmental Protection team has commented that the proposed methodology for the noise chapter is acceptable. It will be expected that internal noise levels as well as noise levels in external amenity areas will comply with the levels in BS8233/WHO guidance. Overheating should be considered if noise levels can't be achieved with openable windows.

Hydrology, Flood Risk and Drainage

The Site lies in 'Flood zone 1 – Low probability' according to the Environment Agency's (EA) online flood maps. Kent County Council (KCC) Preliminary Flood Risk Assessment (published September 2011)

provides mapping of the areas within the county susceptible to groundwater flooding. The site lies outside of all such areas. The site partially lies within groundwater Source Protection Zone (SPZ) III – Total Catchment, with the westernmost portion of the site located within groundwater Source Protection Zone (SPZ) II – Outer Protection Zone.

The potential significant effects identified for the construction works for assessment in the ES are as follows:

Receptor	Effects	Scoped In
Downstream water network	Silt pollution and spillage incidents affecting the downstream water environment as a result of construction activities	✓
Groundwater table	Groundwater body could be impacted by oil/chemical spillage as a result of construction activities	✓

The potential significant effects identified for the operational phase for assessment in the ES are as follows:

Receptor	Effects	Scoped In
Downstream properties	Increase in surface water runoff due to the increase in impermeable surfacing as a result of development	✓
Downstream properties	Displacement of floodwaters due to proposed development in flood risk areas	✓
Groundwater table	Impact on water quality in the receiving water environment due to pollutants from the development being discharged to ground	✓
Receiving foul sewer network	Increased in foul water flows to the existing foul water network increasing sewer flood risks downstream of the proposed development	✓

Potential effects during construction and once the development is completed and operational that are not likely to be significant are set out as follows:

Receptor	Effects	Scoped In
Downstream flow pathways	Localised overland flow pathways temporary altered during Construction Phase as a result of earthworks, temporary compounds, etc. are unlikely to significantly affect overall pathways and watercourse away from the site	X
Downstream river catchments	Impact on the water quality of the downstream river catchments due to the proposed development would be very limited due to its distance from the nearest watercourse	X

Due to the high volume of work, the EA are unable to provide comments on Environmental Impact Assessment Scoping Reports at the present time and have provided a link to a handbook for Scoping Projects and guidance that contains their local standard preliminary advice for development proposals.

KCC Flood and Water Management, as the Lead Local Flood Authority (LLFA), has reviewed the EIA Scoping Report (September 2025) and understands that a Flood Risk Assessment and Drainage Strategy will be prepared alongside any Environmental Statement. The LLFA agrees that groundwater protection and appropriate surface water management are essential on site and should be thoroughly considered moving forward.

In developing the drainage strategy, they would highlight that DEFRA published the National Standards for Sustainable Drainage Systems in June 2025. The LLFA is now actively applying these latest standards, with each new major development being assessed against them.

Archaeology

The site lies in two Archaeological Notification Areas (ANA) designated for its Medium Palaeolithic potential and as an area of multi-period background potential. It is located adjacent to the historic settlements of the medieval villages of Meopham, Hook Green, and Sole Street.

An Archaeological Desk-Based Assessment (DBA) will be undertaken and will form the archaeological baseline for the ES chapter.

The potential significant effects identified for the construction works for assessment in the ES are as follows:

Receptor	Effects	Scoped In
Prehistoric Remains	Construction phase works which results in below ground impacts and/or landscaping has the potential to effect buried archaeological remains	✓
Roman Remains	Construction phase works which results in below ground impacts and/or landscaping has the potential to effect buried archaeological remains.	✓
Medieval Remains	Construction phase works which results in below ground impacts and/or landscaping has the potential to effect buried archaeological remains	✓
Post-medieval Remains	Construction phase works which results in below ground impacts and/or landscaping has the potential to effect buried archaeological remains.	✓

With consideration of the environmental characteristics of the site and the proposed development once completed and operational, no likely significant effects on sensitive receptors have been identified.

KCC Heritage has confirmed that it would be appropriate for archaeology and heritage to be 'scoped in' for the EIA process and that the process set out in Chapter 10 of the Iceni EIA Scoping Report would be appropriate, as would the model structure of the ES chapter.

Ecology

The site comprises a residential property with associated garden; agricultural fields, hedgerows, woodland, and grassland. There are no statutory ecology designations on the site but statutory and non-statutory designated sites within a potential zone of influence are set out in the Scoping Report.

The likely significant effects identified for the construction works for assessment in the ES are set out as follows:

Receptor	Effects	Scoped In
Bramble scrub	These areas contained common and widespread species with no rare or notable species recorded. This habitat will be lost as a result of the Proposed Development. The intrinsic loss of this habitat is not considered to be significant. However, its value lies in the protected species which it could support and therefore this habitat has been scoped into the assessment.	✓
Woodland	Three parcels of woodland are present within the Site. These areas are to be retained as part of the proposals. In the absence of mitigation, effects on woodland include disturbance (visual and noise), pollution (surface water runoff and dust), and lighting. In addition to this, there may be impacts on protected and/or notable species which are present within the woodland. Given this, impacts on woodland have been scoped into the assessment.	✓
Hedgerows	Hedgerows will be partially removed as part of the proposed development. This could result in significant impacts on both the hedgerows themselves, and the protected and/or notable species which they support. In the absence of mitigation, effects to retained hedgerows include disturbance (visual and noise), pollution (surface water runoff and dust), and lighting. Given this, impacts on hedgerows are scoped into the assessment.	✓
Rural trees	Scattered trees are present across the Site. For the purposes of this assessment, it is assumed that at least some of these trees will require removal. Retained trees will be subject to impacts in the absence of mitigation including accidental damage, roost compaction, pollution and dust deposition. Given this, significant effects cannot be scoped out and rural trees are scoped into the assessment.	✓
Badger	The potential badger sett identified within the north west of the Site will be retained. A 30m buffer will be implemented from this area of woodland to the development Site. However, in the absence of mitigation, significant impacts including accidental sett destruction, killing and/or injury and disturbance of badgers, loss of habitat and fragmentation could occur.	✓
	Given this, significant effects cannot be scoped out and badgers are scoped into the assessment.	
Bats	Bat Activity surveys are currently being undertaken. Upon completion of these surveys the level of use by bats within the Site will be known, and bespoke mitigation will be developed. Scattered trees are also present within the Site, once a tree removals plan has been developed, these trees will need to be assessed for their suitability to support roosting bats. In the absence of mitigation, effects on bats during construction include habitat loss and fragmentation, disturbance and mortality. Given this, significant effects cannot be scoped out and bats are scoped into the assessment.	✓
Birds	Potential effects on breeding birds during construction include habitat loss, mortality, fragmentation and disturbance, inclusive of considerations to ground nesting birds. Given this, significant effects cannot be scoped out and birds are scoped into the assessment.	✓
Dormice	Dormouse surveys are currently being carried out. Upon completion of these surveys the presence of dormouse within the Site will be known, and bespoke mitigation will be developed, if required. For the purposes of this scoping report, it is assumed that dormouse are present within suitable habitats within the Site. Potential effects on dormouse during construction include habitat loss, severance, disturbance and mortality. Given this, significant effects cannot be scoped out and dormice are scoped into the assessment.	✓
Reptiles	Likely significant effects on reptiles during construction include habitat loss and fragmentation, disturbance and mortality of individuals. Given this, significant effects cannot be scoped out and reptiles are scoped into the assessment.	✓

The likely significant effects identified for the operational phase for assessment in the ES are as follows:

Receptor	Effects	Scoped In
Designated Sites	During the operational phase of the Proposed Development, potential effects on designated sites include increased visitor pressure.	✓
Habitats (woodland, scrub, hedgerows, trees)	During the operational phase of the Proposed Development, potential effects on retained habitats include disturbance and pollution (noise, lighting) and increased visitor pressure (woodland).	✓
Protected species: Badger, bats, birds, dormice, reptiles	During the operational phase of the Proposed Development, potential effects on protected species include increased disturbance.	✓

Potential effects during construction and once the proposed development is completed and operational that are not likely to be significant include designated sites, modified grassland, cereal crops, Great Crested Newts, Water vole, otter, white clawed crayfish and Beaver, invertebrates and hedgehog.

Natural England has not commented on the specifics of the Scoping Report but Annex A to their letter provides their advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

KCC Biodiversity have commented that the submitted scoping report has detailed the following ecological surveys are being carried out and will be submitted as part of the planning application:

- Preliminary Ecological Appraisal
- Biodiversity Net Gain Assessment
- Bat Activity Surveys
- Preliminary Roost Assessment of buildings and trees
- Breeding Bird Surveys
- Dormouse Surveys
- Reptile Surveys
- GCN HSI assessments on any ponds in the site /surrounding area.
- Badger Survey
- Consideration of potential to support water voles, hedgehogs and invertebrates.

They are satisfied that the range of surveys/assessments to be carried out will adequately assess the ecological interest of the site.

The following must be submitted as part of any Environmental Impact Assessment:

- Ecological Impact Assessment – the EclA must be informed by the results of other consultants reports e.g. noise / air quality.
- Plans demonstrating that the mitigation proposed within the EclA can be implemented within the site
- Biodiversity Net Gain Assessment – must demonstrate that it has followed the mitigation hierarchy. If the submitted information details that a minimum of 10%
- BNG can be achieved for area and linear features the submitted plans must demonstrate it is

achievable.

- Ecological enhancement plan demonstrating the minimum number of enhancement features to be incorporated in to the site and buildings.
- Outline lighting strategy
- Outline management plan.

Landscape and Visual Impact Assessment

There are no statutory landscape or ecology designations on the site, and no heritage constraints within the site. There are several Listed Buildings in proximity to the site, including Norwood Farmhouse (Grade II Listed) located along Norwood Lane adjacent to the site and conservation areas. South-east of the site, the Kent Downs National Landscape abuts Camer Road. Due to the combination of a relatively flat and low-lying Site and existing landscape features both within and surrounding the site, visibility is generally localised and restricted to those areas within the immediate vicinity. With longer range views screened by vegetation, transport infrastructure and built form. Parts of the site are visible from the National Landscape to the east.

The likely significant effects identified for the construction works and operational phase for assessment in the ES are set out as follows:

Receptor	Effects	Scoped In
Landscape Receptors		
The Site's Character	Direct effects on the landscape character of the Site	✓
Landscape elements on the Site: Hedges, Trees, Woodland, Ditches and Land	Potential for direct effects to hedgerows, trees, ditches, woodland and land.	✓
Kent – Landscape Character Area (LCA) Ash Downs	Potential for direct and indirect effects to the landscape character.	✓
Kent - LCA Luddesown: West Kent Downs	Potential for indirect effects to the landscape character.	✓
Kent Downs National Landscape	Potential for indirect effects to the Kent Downs National Landscape.	✓
Gravesham - LCA Meopham Downs	Potential for direct and indirect effects to the landscape character.	✓
LLCA defined by applicant within 2km study area	Potential for direct and indirect effects to the landscape character.	✓
Visual Receptors		
Residential properties along Camer Road, Camer Street, Norwood Lane, Nursery Road, Fairview Gardens and Tradescant Drive	Potential changes to view experienced by the residents.	✓
Users of Camer Road, Norwood Lane, Green Lane and Camer Street	Potential changes in the composition of the view experienced by motorists and users of the roads.	✓
Recreational users of PRoW NS250, NS192, NS308, NS242, NS223, NS191 and NS190	Potential changes in the composition of the view experienced by recreational users of the PRoW network.	✓

Potential effects during construction and once the proposed development is completed and operational that are not likely to be significant are set out as follows:

Receptor	Effects	Scoped out
Landscape Receptors		
NCA 119 – North Downs	Direct and indirect effects on the landscape character are unlikely due to the geographic extent of the character area and scale of the Proposed Development in relation to it.	X
Kent Downs National Landscape	Direct and indirect effects on the night sky are unlikely due to the proximity to the existing settlements at both Sole Street and Hook Green	X
Visual Receptors		
Residential properties along Walnut Tree Way, Ediva Road, Wrotham Road, Station Road, Edmund Close, The Railway Sidings, Cheshunt Close, Melliker Lane, Camer Park Road, Huntingfield Road, Manor Road, Sole Street and Longfield Road.	Potential for changes in the view experienced by the residents, but due to the angles of the properties, intervening built form, intervening landform and existing vegetation, no significant effects are expected.	X
Recreational users of PRoW NS250, NS192, NS308, NS242, NS223, NS191 and NS190	Direct and indirect effects on the composition of the view during the night time are unlikely due to the proximity to the existing settlements at both Sole Street and Hook Green.	X
Recreational users of PRoW NS186, NS304, NS185, NS187, NS315, NS173, NS152, NS253, Judson's Recreation Ground and NS248.	Limited potential for changes in the view experienced by walkers, but due to intervening vegetation and built form, these are not expected to be significant.	X

The Kent Downs National Landscape (KDNL) team agrees that the proposal comprises EIA development and that an LVIA should be scoped into the EIA for both construction and operational effects.

They welcome the inclusion of the KDNL as a receptor, given the scale of the proposal and the site's proximity to the Kent Downs.

It is agreed that it would be appropriate to scope NCA 119- North Downs out of the ES.

They are concerned about the intention to scope out night-time effects to the KDNL. The application is for a significant scale of development and will inevitably involve the provision of street lighting. The application also includes the provision of a number of sports pitches, both associated with the school and for other recreational activities. It is not known whether the sports pitches would be floodlit or where they would be located within the site, relative the KDNL boundary. Given the current baseline situation, with the vast majority of site containing no lighting source, it is considered inappropriate to scope out night-time effects on the KDNL from the ES, given that tranquillity, including dark night skies, is identified as one of its special qualities.

It is noted the Assessment is intended to be undertaken for construction and year 1 in winter and at Year 15 in summer. It is considered it would be helpful to also include an assessment at year 15 operation in winter.

The KDNL team welcome the intention to include wireline or massing model photomontages within the

LVIA (Type 3) and the inclusion of one of these from within the KDNL. In respect of proposed viewpoint locations, it would have been helpful for a ZTV to be included to aid a desktop assessment of the suitability of the viewpoint locations that are proposed.

Relevant Kent Downs National Landscape publications which may be helpful in informing the assessment include the Kent Downs Position Statements on Setting, our Colour Guidance and Landscape Design Handbook and the adopted Management Plan, 2021 - 2026. In addition, the KDNL Landscape Character Assessment Update, 2020 should be referenced in the LVIA.

Cumulative Schemes

No cumulative schemes were identified. This should be kept under review.

Non-Significant Environmental Effects

As set out above, a number of effects have been scoped out of the ES.

However, there are some of these matters that consultees have commented on or disagree, as follows:

Built Heritage

Historic England (HE) state that this development could, potentially, have an impact upon a number of designated heritage assets in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), they would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

There are no listed buildings or scheduled ancient monuments within the site boundary but the site forms part of the wider setting of several designated heritage assets. Accordingly, HE considers that the effects of development proposals are mainly related to potential impact on their significance through change of their setting. On this basis, we consider that, besides archaeology, the built heritage should be also scoped in for the EIA process. It should, therefore added, among the topics to be assessed listed in the Iceni EIA Scoping Report (September 2025).

The main designated heritage assets within 500m of the proposed development include the following:

- Hook Green Conservation Area
- Waterditch (Grade II) (LEN: 1039914)
- Nevill House (Grade II) (LEN: 1096350)
- The White House (Grade II) (LEN: 1096349)
- Mulberry House (Grade II) (LEN: 1039911)
- Hook Green Farmhouse (Grade II) (LEN: 1350238)
- The Old Forge The Old Forge Cottage (Grade II) (LEN: 1367140)
- Evenden Farmhouse (Grade II) (LEN: 1096354)
- Camer Green Cottage (Grade II) (LEN: 1372283)
- 9 And 10, Camer Street (Grade II) (LEN: 1096345)
- Somers (Grade II) (LEN: 1350235)
- 5 And 6, Camer Street (Grade II) (LEN: 1096344)
- Bower Cottage (Grade II) (LEN: 1096313)
- Yeomans House (Grade II) (LEN: 1095063)
- Sole Street House (Grade II) (LEN: 1067728)
- Camer House (Grade II) (LEN: 1052357)
- Bailiffs House (Grade II) (LEN: 1052333)
- Building Approximately 30 Metres To West Of Camer House (Grade II) (LEN: 1350234)
- Norwood Farmhouse (Grade II) (LEN: 1039912)

It is important that the Environmental Statement is designed to ensure that all impacts are fully understood. In order to achieve this, the EIA should include a comprehensive Heritage Assessment devised as a separate document from the Landscape Visual Impact Assessment, due to the distinct content and purpose of the two reports.

HE would also expect the Environmental Statement to consider the potential impacts on any other non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

With regard to potential impact on archaeology, the site is located within two different Archaeological Notification Areas designated for their Medium Palaeolithic potential and as areas of multi-period background potential.

We note that a Desk-Based Assessment and a geophysical survey (GS) will be undertaken to further assess the potential for previously unknown archaeological deposits. The programme for the GS will be agreed with the Archaeological Advisory Team to GBC via a Written Scheme of Investigation and a method statement, including a specification for works. If significant archaeology is recorded during the geophysical survey, a trial trench evaluation may also be required, and/or clear options for post-determination flexibility in layout/design for preservation in situ and/or recording.

The Environmental Chapter should include the reports and results of these investigations as appendices.

The assessment should take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits.

HE would strongly recommend that the applicant involves their own conservation officers and archaeological staff in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Contamination

The Council's Environmental Protection team agree that contaminated land has been scoped out of the EIA. With regards to contamination, although scoped out, section 14.18 advises that a geo-technical report will be submitted with any application. As the site has been in agricultural use, any testing should include testing for pesticide/herbicide residue, particularly in any garden areas or communal soft landscaped areas.

Conclusion

Having regard to all of the above, this Scoping Opinion is made on the basis of the details submitted in the EIA Scoping Report (September 2025), and other information available to the Council. It is considered that the EIA Scoping Opinion Report covers all the topics that the Council would require to be included within an Environmental Statement for the proposed development, with the addition of Built Heritage as raised by Historic England. On this basis, the Council considers that the scope of the ES and methodology for assessing significance is acceptable.

In reaching this decision the Local Planning Authority has taken account of the information provided about the proposed development, the specific characteristics of the development and the environmental features likely to be affected, as required under Regulation 15(6). This Scoping Opinion does not preclude the Local Planning Authority from requesting further information when considering any future planning application for

the proposed development.

Recommendation

Observations sent.

Case Officer:	Mrs Katherine Parkin	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	16 October 2025	Dated:	17 October 2025