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Planning Statement

Land North of Camer Road, Meopham

Iceni Projects Limited on behalf of the McManus Family

ICENI PROJECTS LIMITED
ON BEHALF OF THE
MCMANUS FAMILY

February 2026

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Planning Statement
LAND NORTH OF CAMER ROAD, MEOPHAM

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Iceni Projects Limited ('Iceni') on behalf of the McManus Family (the Applicant') to accompany a planning application for residential-led development at Land North of Camer Road, Meopham ('the Site').
- 1.2 This application is submitted in outline with all matters reserved for future consideration, except for access. The proposed description of development is as follows:

Outline planning application for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities alongside associated access, landscaping, parking, and infrastructure; with all matters reserved except for access.

- 1.4 The submitted proposal considers the Site constraints and opportunities to deliver much-needed housing on the settlement edge of Meopham, and adjacent to the village of Sole Street. Both settlements have train stations which are within walking distance of the Site, providing regular links into London and neighbouring towns, making this a highly sustainable and logical location for new development. The design carefully responds to the surrounding context in terms of height and density and has the potential to deliver valuable public benefits including 50% affordable housing, a new 2-form intake primary school in the heart of the development and well connected to existing communities, a significant proportion of high quality and accessible open space including playing fields and sports facilities, alongside new pedestrian and cycle linkages. Due to the significant level of open space that will be safeguarded, it should be noted that the proposed development will remain separated from the settlement of Sole Street, aside from enhanced active travel links.
- 1.5 The scheme concept has evolved over many years, having been first submitted through the Council's call for sites in 2018 before being identified in the Regulation 18 Local Plan as a prospective development for around 525 new homes, prior to the establishment of Grey Belt, and at a time when Gravesham's housing need was less acute than it is today.
- 1.6 The scheme has further evolved through engagement with the local community, councillors, planning officers and statutory consultees, resulting in a considered and deliverable scheme that balances the requirements of the National Planning Policy Framework (NPPF), the adopted Local Plan and Supplementary Planning Documents (SPDs), and the views of key stakeholders.
- 1.7 The purpose of this Planning Statement is to provide Gravesham Borough Council (GBC) with an overview of the existing site and surroundings, the relevant planning history for the Site, and to provide

justification for the proposed development in the context of Gravesham's Local Plan and national planning policies.

Submission Documents

- 1.8 In addition to this Planning Statement and Application Form prepared by Icen Projects as part of the planning application, the following documents and drawings have been prepared and submitted to accompany this planning application:

Submission Documents

Document title	Author
DL00_Red Line Boundary_D (for approval)	Icen Projects
DL01_Land Use Parameter Plan_B (for approval)	Icen Projects
DL02_Movement and Access Parameter Plan_B (for approval)	Icen Projects
DL03_Building Height Parameter Plan_B (for approval)	Icen Projects
DL04_Landscape Parameter Plan (for approval)	Icen Projects
DL05_Concept Masterplan_Rev C (illustrative)	Icen Projects
DL06_Green Infrastructure Plan (illustrative)	Icen Projects
Detailed Access Plan (drawing no. 211206-09)	TTC
Planning Statement	Icen Projects
Design and Access Statement	Icen Projects
Environmental Statement Volume 1 – Main Report	Icen Projects
Environmental Statement Volume 2 – Technical Appendices	Icen Projects
Environmental Statement Volume 3 – Non-Technical Summary	Icen Projects
Arboricultural Impact Assessment & Tree Survey	Arbtech
Biodiversity Net Gain Baseline Metric and Baseline Habitat Plan	Greenspace
Utilities Assessment	Premier Energy
Phase 1 Land Contamination Report	Leap Environmental (RSK)
Energy Strategy & Sustainability Statement	Icen Projects
Statement of Community Involvement	Icen Projects
Agricultural Land Classification Report	Kernon Countryside Consultants
Education Technical Note	Icen Projects

Environmental Impact Assessment

- 1.9 An Environmental Impact Assessment (EIA) Scoping Report was issued to GBC on 8th September 2025 (ref: 20250900). In line with the EIA Regulations, this report identified the nature and purpose of

the Proposed Development (including its location and technical capacity) and the likely significant effects on people and the environment, and outlined the proposed approach, methodology and scope of the Environmental Statement (ES).

- 1.10 Within the Scoping Opinion received from GBC, it was 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. Accordingly, an Environmental Statement has been prepared in support of this application, in accordance with the scope and conclusions set out within the Scoping Report
- 1.11 The table below outlines the Environmental Statement chapters which have been prepared for this application.

Environmental Statement Chapter	Author
Socio-Economics	Iceni Projects
Transport and Access	The Transportation Company Ltd (TTC-TP)
Air Quality	Entran Limited (Ltd)
Noise and Vibration	Entran Limited (Ltd)
Hydrology, Flood Risk and Drainage	GTA Civils
Archaeology	Iceni Projects
Ecology	Greenspace Ecology
Landscape and Visual Impact Assessment (LVIA)	Iceni Projects
Built Heritage	Iceni Projects
Residual Effects, Mitigation and Cumulative Effects	Iceni Projects

The McManus family

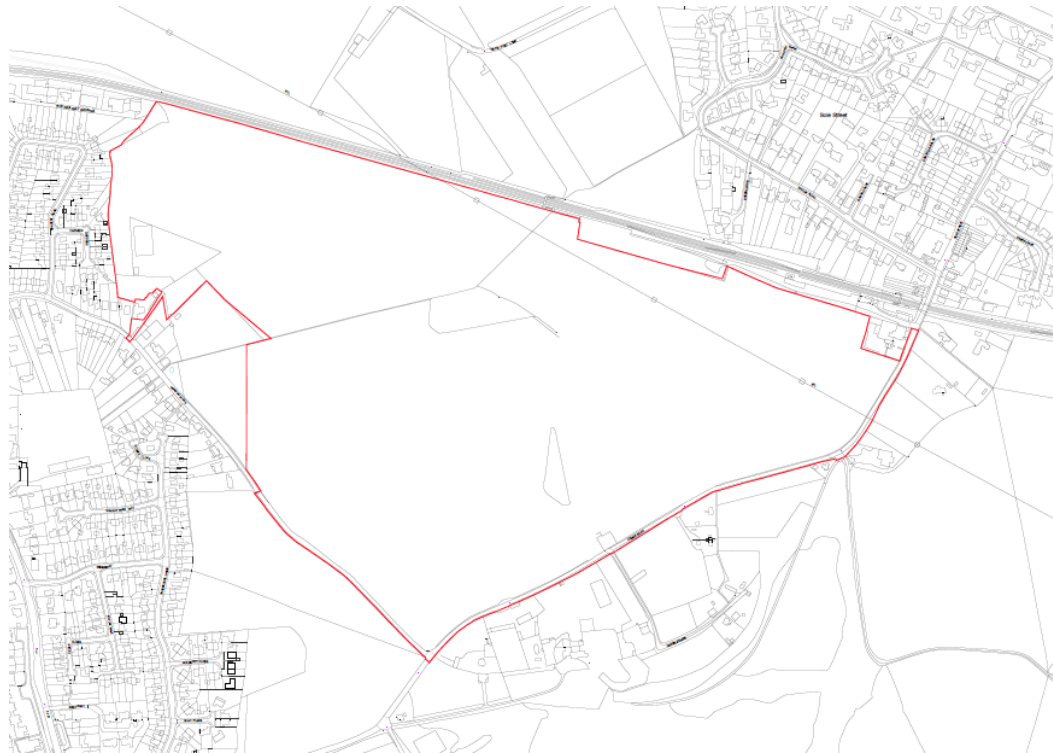
- 1.12 The land is owned by the McManus family, who have lived in Meopham for many years. This land has been identified for development in the Regulation 18 local plan and has been the subject of considerable developer interest over many years. However, it is important to the family that this planning application secures the vital infrastructure required to underpin a future housing development of the ambition and quality envisaged, and to ensure that a positive legacy is created for Meopham. Accordingly, the McManus family have advanced the outline application as applicants and will instead look to work with development partners in the future to ensure a holistic development is secured.

2. APPLICATION SITE AND CONTEXT

Site Description

- 2.1 The Site is located to the east of Hook Green/ Meopham and to the southwest of Sole Street. It comprises c.44ha of predominantly flat, readily developable land which is currently used to cultivate arable crop. Alongside the agricultural land, there are 6 acres of closely mown grass in the form of paddocks in the north-western corner of the Site, with an associated small stable block, and two (small) areas of woodland within the central portion of the Site, and a small agricultural building within the western section of the Site.

Figure 1: Site Area



- 2.2 The Site is located outside the development boundary of both Sole Street and Hook Green/ Meopham, and lies wholly within the Metropolitan Green Belt. The Site is bordered by a railway line to the north, Camer Road to the southeast, and Norwood Lane to the southwest. The northwestern boundary is marked by the rear gardens of the properties along Nursery Road, within the village of Hook Green/ Meopham. Overall, the Site is well-contained and is bordered by defensible boundaries on all four sides. A more detailed breakdown of the surrounding land uses is provided below:

- The north of the Site is bound by the Chatham Main Line, the Storage Box Self Storage and Network Rail yard. Sole Street train station (including the Station Approach access road) is located to the immediate northeast corner of the Site. Immediately adjacent to the northeast

corner of the Site is 'The Railway Inn and Railway Pétanque Club' and associated parking. To the north of the Chatham Main Line is mature woodland (designated as priority habitat inventory – deciduous woodland), undeveloped agricultural land and cul-de-sacs of residential dwellings associated with Manor Road, Scratton Fields and Sallows Shaw.

- The east of the Site is bound by Camer Road. Directly beyond are residential dwellings, Royal Hounds Dog Park and agricultural fields. The south east of the Site is also bound by Camer Road. Beyond are (detached) residential dwellings and Camer Park Country Park. Beyond are agricultural fields interspersed with woodlands, road infrastructure and rural villages. This land (to east and south east) of the Site is located within Kent Downs National Landscape (KDNL).
- The south west of the Site is bound by Norwood Lane, a small parcel of agricultural land and residential dwellings (with associated gardens and paddocks) located on the northern edge of Norwood Lane. To the south of Norwood Lane is a parcel of undeveloped agricultural land (bounded by Green Lane, Camer Road and Tradescant Drive), and cul-de-sacs of residential dwellings along with some commercial uses, including Judson's Recreation Ground.
- The west of the Site is bound by residential dwellings associated with Nursery Road and Fairview Gardens and commercial uses along The Railway Sidings, including Meopham Welding Supplies. Directly beyond is cul-de-sacs of residential dwellings and Meopham train station. Beyond Wrotham Road is more residential development and extensive areas of undeveloped agricultural land.

2.3 The Site falls within the administrative boundaries of Gravesham Borough Council. Aside from the Green Belt, there are no other significant planning policy designations covering the Site. There are no statutory landscape or ecology designations on Site, although the Site does lie adjacent to the Kent Downs National Landscape.

2.4 The Site is located entirely within Flood Zone 1 (low risk of flooding). The vast majority of the Site is identified to be at 'very low' risk of surface water flooding, meaning that the Site has less than 0.1% of surface water flooding each year. However, small sections of land within the Site lies within 'high', 'medium' and 'low' risk of surface water flooding.

2.5 The nearest designated Site of Special Scientific Interest (SSSI), Shorne and Ashenbank Woods, is located approximately 2km north east of the Site. Halling to Trottiscliffe Escarpment (SSSI) is also located approximately 2.55km east, and Cobham Woods (SSSI) is located approximately 2.6km northeast. The nearest designated site of international importance is North Downs Woodland, designated as a Special Area of Conservation (SACs), located approximately 2.65km south east of the Site.

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- 2.6 According to the Agricultural Land Classification map (ALC)ⁱ the Site is designated as Grade 2 agricultural land classified as, *'very good quality agricultural land'*.
- 2.7 There are a number of heritage assets in proximity to the Site, including Norwood Farmhouse, which is located on Norwood Lane on the western boundary of the Site, Bailiffs House, Camer House (and associated building), 5, 6, 9 and 10 Camer Street, Somers and Camer Green Cottage, all of which are Grade II listed.
- 2.8 Existing vehicular access is located off Camer Road, which is used for agricultural machinery. 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.

Planning History

- 2.9 There is no planning history for the Site itself, which has historically been used as an agricultural field for the cultivation of crops.
- 2.10 The Site was listed as a potential draft site allocation (GBS-E) within the Regulation 18 version of the Local Plan (2020) for approximately 520 dwellings (see Figure 2). This supports the position that the land is a suitable and sustainable location for major development. The Regulation 18 draft acknowledged the potential for the delivery of development in close proximity to train stations (including Meopham and Sole Street) and identified that over 33% of the Borough's Housing Need could be met at Meopham, if it was distributed on a pro-rata basis.

Figure 2: Draft Allocation GBS-E



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- 2.11 With regard to the surrounding area, an EIA screening application (ref: 20250399) was submitted in April 2025 for two sites to the southwest (Land at Wrotham Road, Meopham), for up to 350 dwellings and up to 120 dwellings respectively. Another screening application (ref: 20251035) was submitted in October 2025 for the site immediately to the southwest (Land West of Norwood Lane, Meopham) for up to 150 units. These sites were also identified as draft allocations in the emerging Local Plan. These sites are now the subject of outline planning applications for residential development.

Pre-Application Engagement

- 2.12 Extensive engagement with key stakeholders, including local residents, the local authority and relevant technical bodies, has been carried out over the course of the preparing this application.

Gravesham Borough Council

- 2.13 An initial pre-app meeting was held with GBC in October 2024. This was prior to the publication of the new NPPF and the introduction of “grey belt” and focussed instead on the draft allocation. Initial discussions were had regarding the best course of action for pursuing an application, including involvement with relevant stakeholders such as KCC Highways and National Landscape, and signing a PPA.
- 2.14 Following this, a completed PPA agreement was sent to the Council in March 2025 to try to agree an application programme. However, there was no response, and there has been no subsequent engagement from GBC despite repeated attempts to constructively engage with the authority.

Kent County Council (KCC)

- 2.15 An initial pre-application meeting was held between KCC Highways, GBC and the applicant on 10th January 2025 to discuss the principle of development at the Site and the early design iterations. It was considered that the Site’s location, within walking distance of both Meopham and Sole Street train stations, was beneficial, however it was noted that walking and cycling routes to these facilities will need improving. It was also considered that bus provision should be improved.
- 2.16 A follow-up meeting was held between KCC Highways and the applicant on 18th June 2025. It was agreed that the access proposal is acceptable with the mitigation measures proposed, such as speed-reduction along Camer Road, and the proposed bus loop was also considered to be beneficial.
- 2.17 A pre-application meeting was also held with KCC Education on 22nd January 2025. They were supportive of the proposals, identifying that there is likely to be a rural shortfall of school places in the coming years. A follow-up meeting was held on 2nd June 2025, and it was advised that the school would likely be needed in the later phases of the development.

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- 2.18 A pre-app meeting was also held with the LLFA on 21st October 2025, and the comments received have been addressed within the submitted Flood Risk Assessment and Drainage Strategy.

National Landscape Unit

- 2.19 A request for pre-application engagement was made to the National Landscape Unit on 21st May 2025. This request was refused, as although the Site was subject to a draft allocation in the Regulation 18 Local Plan (2020), the National Landscape Unit stated that it is standard policy for KDNL Unit not to enter into pre-application discussions unless a proposal is supported by the local authority, for example if it is an allocation in a local plan or it has been indicated by a LPA that a proposal would be likely to be supported.

Public Consultation

- 2.20 A well-publicised public consultation was carried out which received a good level of responses to the initial proposals by members of the local community. The public consultation was supported by virtual and physical events, as well as the provision of various channels for submitting feedback, comments and asking questions. Letters were also sent to ward councillors setting out details of the proposal.
- 2.21 Two public exhibitions were held on Sunday 14th September 2025 and Monday 15th September 2025 at/outside 1st Meopham Scout Hut, Judson's Recreational Ground, Meopham, in which members of the local community were invited to give their thoughts on the proposals and provide any suggestions. These events were well-attended, and the feedback provided has been taken on board. The proposals have been amended to accommodate the views of the local community where possible, including the provision of sports facilities such as a club house and sports pitches for use of local residents.
- 2.22 The submitted Statement of Community Involvement (SCI) details the full engagement and consultation which has been undertaken with stakeholders and statutory consultees to refine the proposals and ensure that they comply with policy and guidance.
- 2.23 The applicant will continue to consult with the local community and engage proactively with Gravesham Borough Council, Kent County Council, and Meopham Parish Council throughout the preparation and determination of this outline planning application.

3. PROPOSED DEVELOPMENT

- 3.1 This section outlines the proposed development and should be read in conjunction with the submitted Design & Access Statement (DAS). The application seeks outline planning permission for the following development:

Outline planning application (with all matters reserved except access) for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities, alongside associated access, landscaping, parking, and infrastructure.

- 3.2 All matters are reserved except access, therefore there will be subsequent Reserved Matters Application(s) (RMAs) to establish appearance, landscaping, layout and scale. The following key documents are submitted as part of the application, which will define the extent and location of development and help to inform and set the context of these RMAs:

- DL01_Land Use Parameter Plan_B
- DL02_Movement and Access Parameter Plan_B
- DL03_Building Height Parameter Plan_B
- DL04_Landscape Parameter Plan

- 3.3 The parameters plans are submitted for formal approval to fix the maximum heights, developable area, and key movement corridors, including the bus route, within the proposed development. A detailed access plan has also been submitted for approval (ref: 211206-09).

- 3.4 A Design and Access Statement is submitted to inform the design development through the RMAs, alongside an indicative masterplan which has been informed by the results of various technical reports. It shows how the Site could be comprehensively developed and how the development proposals could relate to the surrounding area. This plan is illustrative in nature and demonstrates how the proposals could come forward in line with the parameters. However, this would not be an approved plan.

Key Masterplan Vision and Principles

- 3.5 The illustrative masterplan has been developed with a clear emphasis on retaining and enhancing the Site's natural assets, with the aim of fostering a strong and lasting connection between the local community and the surrounding natural environment. The vision for the project is to create a high-quality neighbourhood extension to Hook Green/ Meopham through an infrastructure-led masterplan.

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- 3.6 Whilst the scheme will comprise primarily market and affordable housing, the proposal is for an infrastructure-led extension to Meopham/Hook Green, featuring a new primary school, a Local Centre, new public realm, sports facilities, allotments, accessible, open green space, and new pedestrian and cycling infrastructure to enhance the connectivity between Meopham and Sole Street.
- 3.7 The layout was inspired by the inherent qualities of the Site, retaining the areas of woodland, and respecting the setting of the National Landscape. The rural edge is maintained to the east, closer to Sole Street, focussing the more built-up areas adjacent to the larger settlement of Meopham. It is critical that whilst the proposed development will be well-connected to Sole Street Station, the built form will remain visually and spatially separated from the village of Sole Street, to ensure the setting of each village remains distinct.
- 3.8 Access and movement were also key in shaping the layout. The Site lies within a sustainable location, and a key aim of the proposal is to create lifestyles which support sustainable behaviours such as walking and cycling, create sustainable patterns of development and deliver social, economic and environmental benefits to the area. Ensuring suitable pedestrian and cycle connections to both railway stations was therefore a key driver for the layout. This includes a less formal active travel route through the proposed open space to the east, which connects to the footpath on Camer Road through the provision of a new pedestrian crossing, and a route to the north-west which connects to Norwood Lane, providing access to the centre of Meopham/ Hook Green and Meopham Station. An Active Travel Zone is also proposed further south on Norwood Lane, which would restrict vehicular traffic to residents only, creating a safe route for cyclists and pedestrians. A Bus Loop is also proposed to travel around the school, providing bus connections within walking distance for future residents.
- 3.9 Overall, the development will provide:
- Up to 725 homes (Use Class C3) with a housing mix to reflect locally identified needs.
 - 50% affordable homes (up to 363) of different types and sizes to reflect all the needs of the community and promoting opportunities for social inclusion.
 - A 2-form intake primary school to address local need for rural schools, identified by Kent County Council.
 - A Local Centre with up to 500 sqm of Class E uses, providing the potential for small convenience shops and local businesses.
 - New areas of high quality and functional open space which will be accessible to both existing and new residents, including a range of typologies such as allotments, semi-natural green spaces, and dog parks, with green areas making up over half of the total site.

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- Sports pitches including a Club House with changing facilities, kitchen and rooms for community uses.
 - High quality play areas to encourage children to get outside and to create informal social areas
 - Provision of pedestrian and cyclist connectivity between Meopham and Sole Street, including to both railway stations, changes along Norwood Lane to allow active travel improvements in the locality, and a new bus loop.
 - On-site sustainable drainage system will create new waterways and ponds offering new habitats for local species.

Proposed Land Use

- 3.10 The broad location of the proposed uses and development parcels are identified in the Parameter Plans submitted as part of this application. The detailed design will be established through future Reserved Matters applications.

Residential Parcels

- 3.11 The residential area as shown in the indicative masterplan provides for up to 725 dwellings and would provide a mix of house types. The development will provide both market and affordable housing, in line with national policies. This includes:

- Up to 362 new market houses.
- Up to 363 new affordable houses (including a policy-compliant split of tenures).
- All new homes will be built to Future Homes standards, and will meet the latest Building Regulations Requirements and policy requirements including national space standards and accessibility standards.

- 3.12 The final housing mix will be established through the future RMA(s) in consultation with officers and the Council's housing team.

Open Space

- 3.13 The proposed open spaces make up over 50% of the Site, and comprise a mix of different typologies, including the following:

- Amenity Green Space
- Play space (for both children and young people)

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- Sports and recreation areas and associated facilities
 - Allotments
 - Dog park
 - Civic Space
 - Natural and Semi-Natural Green Space

3.14 These open spaces have been integrated within the overall landscape strategy, ensuring all residents can access a wide range of open spaces within short walking distance from their home.

School and Community Uses

3.15 Area for a 2-form intake primary school is designated on site, with the required level of access, parking and facilities to support this. This is located in the south-west of the Site, near the existing settlement edge of Hook Green/ Meopham, and the potential development parcel to the southwest, currently subject to an outline planning application by Taylor Wimpey. This ensures the school will be easily accessible for existing and future residents, encouraging active travel methods such as walking and cycling.

3.16 A Local Centre of up to 500sqm is also provided, adjacent to the proposed school. This is within the centre of the Site, ensuring it is accessible to future residents within less than 500m (approximately 5 minutes' walk). Sports Pitches and a Club House are also provided to the north of the Site. This has been positioned such that if floodlighting is required, it will be suitably screened from the National Landscape, and other sensitive land uses (including existing residential development in Hook Green/ Meopham).

Design Quality

3.17 A number of key design principles have been established which have influenced and informed the preparation of the indicative masterplan and parameters plans. These are described in more detail in the Design and Access Statement, and include features such as tree-lined streets, building frontages onto the street scene, and the arrangement of focal areas and key corners to enhance legibility.

3.18 The majority of buildings proposed will be up to 2 storeys, however an allowance is made for buildings of up to 2.5 and 3 storeys towards the northern and central portions of the Site, adjacent to the Local Centre and furthest from sensitive receptors (residential and landscape). This variety will contribute to the proposal's placemaking features, providing focal buildings to support wayfinding and create variation of form within the proposals, whilst still being appropriate within the surrounding context.

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- 3.19 In terms of density, this outline proposal is for up to 725 homes, which would result in a maximum density of 40 dwellings per hectare across the Site. This would be the subject of further consideration and possible refinement through future RMAs in light of the dwelling quantum, size and mix ultimately pursued.

Landscape and Green Infrastructure

- 3.20 The scheme has been designed to be landscape-led, including a range of open space typologies, to reflect the character and appearance of the wider area, with careful consideration given to the Kent Downs National Landscape (KDNL) and Camer Country Park located to the southeast of the Site.
- 3.21 In total, 22.5 ha of open space are proposed across the Site. The eastern section of the Site is proposed to be entirely retained as open space, with significant levels of planting to provide an appropriate visual buffer from the KDNL, such as dense thicket planting along the southeastern boundary. This area is proposed to be primarily grassland and meadow, including a breeding habitat for skylarks alongside informal mown paths and standalone “play along the way” features, to ensure this eastern area remains tranquil and open.
- 3.22 The proposed community features and formal public open space have therefore been directed toward the central and western parts of the Site, including community allotments and a community orchard on the northwestern edge of the Site, where they are easily accessible to both existing and future residents. Similarly, playing fields (including a variety of grass and court sports) are proposed along the northern boundary, where there is the potential for vehicular access. Play equipment is well-distributed across the Site, with the largest NEAP in a central location which is accessible to all dwellings, alongside a number of LEAPs and LAPs to serve existing and future residents.
- 3.23 Furthermore, all high-quality trees will be retained, and a significant level of additional planting is proposed across the Site, including a wealth of proposed native tree planting and hedgerow planting. A woodland belt is proposed to run through the centre of the Site, linking the two existing areas of woodland to form a biodiversity corridor. The large drainage basins will also form attractive landscape features, sown with wildflower seeds.

Access, parking and servicing

- 3.24 The transport strategy is underpinned by a vision-led approach, as advocated in the Framework. A vision-based approach is the setting of outcomes for a development which provides residents and visitors to adopt sustainable travel patterns by creating well-designed, sustainable and popular places and providing the transport solutions to deliver those outcomes, as opposed to predicting future demand to provide capacity.

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- 3.25 As outlined in the DAS and the Transport Assessment, a series of new pedestrian, cycle and vehicular access points are proposed for the development. These are illustrated on the Indicative Masterplan and the Access and Movement Parameter Plan. A series of indicative active travel routes are proposed across the Site, linking to Meopham and Sole Street, the primary school and the local centre, and providing recreational walking and cycling opportunities. The existing PRow will also be retained.
- 3.26 The primary vehicular access will be via Camer Road. A secondary bus and emergency access is proposed further to the west, where Camer Road meets Norwood Lane. A primary loop street is included which provides a one-way route for the bus, looping around the primary school. This will also be used as an active travel route. It is also proposed that a section of Norwood Lane be closed for general traffic use, and a new active travel route implemented that encourages walking and cycling. Existing residents would still be able to access their homes.
- 3.27 The development proposals will provide parking spaces in accordance with regional and local guidance, having reference to the Kent County Council (KCC) Parking Standards. The scheme will also deliver a significant amount of cycle parking and Electrical Vehicle Charging Points in compliance with KCC Parking Standards (2025). Further information on the parking provision for the proposals will be detailed at Reserved Matters stage.

Drainage

- 3.28 The proposed drainage strategy incorporates a range of sustainable features and will reduce flood risk by restricting surface water flows in line with Kent County Council's requirements as the Local Lead Flood Authority (LLFA). The SuDS strategy involves treating development runoff to remove pollutants and storing runoff prior to discharge to ground.

Sustainability / Energy

- 3.29 An Energy Strategy and Sustainability Assessment has been prepared to support this application, with focus on sustainable building design (reduction of energy consumption at source) and provision of energy efficiency measures to exceed compliance with local planning policy. The Energy Strategy is based on a fabric first approach utilising passive design measures, well insulated and airtight building fabric, and utilising low or zero carbon technologies to exceed building regulations requirements. This will be developed further at Reserved Matters stage.

Waste and Recycling

- 3.30 Refuse storage and communal storage will be seamlessly integrated within the development and will be appropriately provided based on minimum requirements per dwelling. Storage and collection points will be convenient for easy collection within 30m of the dwellings and with easy access by vehicles within 25m of point for collection. Further detail will be provided in the RMAs.

4. PLANNING POLICY CONTEXT

4.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section identifies the principal planning policy considerations which have informed the development proposals, and which provide the context for the consideration of this planning application, as well as other material considerations. The current development plan comprises:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)
- Gravesham Local Plan First Review (1994) – saved policies; and
- Kent County Council Minerals and Waste Local Plan 2024 –30 (2020).

4.2 None of the above components of the Development Plan are considered to be up-to-date. Notably, all of the above Plans are over five years old, and in the case of the Local Plan saved policies, they are now over 30 years old. The current spatial strategy was formulated to deliver levels of growth that are far below Gravesham’s identified housing requirement and clearly necessitate a new and significantly different approach to delivering growth.

4.3 Whilst the Development Plan is not “up-to-date”, Paragraph 232 of the Framework explains that existing policies should not be considered “out-of-date” simply because they were adopted or made prior to the publication of this Framework. Due weight needs to be given to policies according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). For this reason, the Framework policies (and the extension of Framework policies outlined in the accompanying National Planning Practice Guidance (NPPG)) are highly relevant to the application proposals and need to be considered in understand the weight to be given to the adopted Development Plan policies at this time.

National Planning Policy Framework (NPPF, December 2024)

4.4 The National Planning Policy Framework (NPPF), as updated in December 2024, provides the planning policies for England and how these should be applied. This section provides an overview of the Government’s national planning policy and guidance that is relevant to the proposed development. The 2024 version was revised by the new Labour Government as part of their ambition to achieve significant economic growth and housing delivery, including delivering 1.5 million homes over this term. The NPPF should be considered within this set context and a number of key paragraphs relevant to the determination of this application are highlighted below:

4.5 Relevant Paragraphs from the NPPF

Achieving Sustainable Development	Paragraph 8 highlights the three overarching objectives of sustainable development – economic, social and environmental. These are interdependent and need to be pursued in mutually supportive ways. Paragraph 9 highlights that planning decisions should play an active role in guiding development towards sustainable development solutions Paragraph 11 outlines the presumption in favour of development. In this context, Part d) outlines that when are no relevant development plan policies, or the policies which are most important for determining the application are out of date planning permission should be granted unless
Decision Taking	i. the application of policies in this Framework that protect areas or assets of particular importance (as set out in Footnote 7) provides a strong reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
Delivering a sufficient supply of homes	Paragraph 61 outlines the importance of supporting the government’s goal of increasing the number of homes available. It highlights the need for diverse range of land to be made available in suitable locations. Paragraph 63 emphasises that the size, type and tenure of housing required should be delivered where needed. This includes affordable housing and housing for older people.
Building a strong, competitive economy	Paragraph 85 outlines that significant weight should be place on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Promoting healthy and safe communities	Paragraph 96 highlights that policies and decisions should claim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles. Paragraph 98 adds that planning decisions should be made positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments. Paragraph 103 outlines the importance of providing a network of high-quality open spaces for health and well-being of communities and deliver benefits for nature and address climate change Paragraph 109 states that transport issues should be considered from the earliest stages of development proposals.
Promoting sustainable transport	Paragraph 110 guides developments to locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 prioritises sustainable transport modes for specific applications for development. Paragraph 117 prioritises pedestrian and cycle movements for this type of development and facilitate other sustainable modes of transport as another solution. Paragraph 124 outlines that an effective use of land towards meeting the needs for homes and other uses should be promoted in decision-making, while safeguarding and improving the environment and ensure safe and healthy living conditions.
Making Effective Use of Land	Paragraph 125 guides decision making for new developments towards a more effective use of land. Paragraph 126 sets out that planning decisions need to reflect changes in the demand for land. Paragraph 130 outlines that where there is an existing or anticipated shortage of land for meeting identified needs, planning decisions should

	avoid home being built at lower densities and ensure that development make optimal use of the potential of each site.
Achieving well-designed places	Paragraph 131 notes that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to the planning and development process and should ensure that the result is sustainable development that creates better places to live and work in Paragraph 135 ensures that development is of high quality by enhancing its environment and respecting local character. Paragraph 136 sets out guidance with regards to retaining trees and tree planting Paragraph 143 sets out the five purposes of the Green Belt Paragraph 148 sets out the hierarchy to release land from the Green Belt
Protecting Green Belt land	Paragraph 153 states that when assessing proposals affecting the Green Belt, “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. As such, in assessing Green Belt applications, local authorities should “ensure that substantial weight is given to any harm to the Green Belt” noting that VSCs will not exist unless the potential harm to Green Belt, by reason of inappropriateness and any other harm, is outweighed by other considerations. Paragraph 155 outlines the criteria to be met for a development to be considered ‘not inappropriate’ within the Green Belt.
Meeting the challenge of climate change, flooding and coastal change	Paragraph 162 emphasises the importance of planning for climate change by reducing greenhouse gas emissions, improving energy efficiency, and minimising the risk of flooding. Paragraph 170 guides development outside areas at highest risk of flooding. Paragraph 181 sets out that development should not increase risk elsewhere and requests a flood risk assessment to be prepared where necessary

Conserving & enhancing the natural environment	Paragraph 187 states that decisions should contribute and enhance the natural and local environment.
	Paragraph 189 states that development within the setting of National Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
	Paragraph 193 sets out the biodiversity principles to be followed and which should guide decision making.
Conserving & enhancing the historic environment	Paragraph 207 to 211 consider proposals affecting heritage assets.
	Paragraph 212 consider the potential impacts to heritage assets and give great weight to asset conservation.
	Paragraph 215 outlines that where development results in less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Emerging NPPF

The Government is further amending national planning policy, and a draft NPPF is out for consultation until March 2026. We understand that this is likely to be adopted during the determination of the application. Once adopted, Iceni will provide an updated analysis of the national planning policy position on the Site.

Green Belt Planning Policy Guidance (PPG, 2025)

- 4.6 The updated 2025 PPG provides guidance on assessing the role of Green Belt land, particularly in relation to when it can be considered to meet the definition of grey belt. It sets out how Green Belt purposes a, b, and d should be considered when assessing sites and details a framework for determining whether development would undermine the integrity of the wider Green Belt. It also provides further information on how Councils should undertake their Green Belt assessments as part of their Local Plan evidence base taking into consideration the potential of some sites to represent grey belt. This guidance is considered in more detail within the submitted Green Belt Assessment.

Gravesham Local Development Plan

- 4.7 The adopted Local Plan Core Strategy covers the period from 1 April 2011 to 31 March 2028.
- 4.8 Policies of potential relevance to the application are tabulated below, alongside our assessment of the weight that should be applied to them based on their consistency with the Framework. This approach is required and undertaken in accordance with the Framework policy approach, which needs to be applied in this case.

Gravesham Local Plan Core Strategy (2014)

Policy	Consistency with the Framework	Comments and Weighting to determine whether the Framework should be relied upon for decision taking
Policy CS01: Sustainable Development	Consistent	This policy reflects a positive approach to sustainable development that proactively seeks solutions to secure development improving economic, social, and environmental conditions. It also recognises the presumption in sustainable development at Paragraph 11 of the Framework, and states that where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise. The policy should be given <u>full</u> weight.
Policy CS02: Scale and Distribution of Development	Inconsistent	This policy is inconsistent with the Framework as the housing numbers are based on outdated evidence and do not reflect the current standard method, requiring only 325 dwellings per year. The strategy also prioritises development in the urban area, focussing on Gravesend, and states that in the rural area, development will only be supported within those rural settlements inset from the Green Belt. The policy does not account for grey belt development within sustainable locations, which is inconsistent with the Framework. This policy should therefore be given <u>no</u> weight.
Policy CS10: Physical and Social Infrastructure	Broadly Consistent	This policy gives support to proposals that provide additional infrastructure to improve community well-being, in line with Paragraph 20 and Paragraph 88d of the Framework. The Policy could go further to ensure GBC are planning positively for the provision of community facilities and shared spaces, in accordance with Paragraph 98. The policy should be given <u>full</u> weight.

Policy CS11: Transport	Broadly Consistent	The proposal is broadly consistent with the aims of the Framework, through the need to provide transport assessments to identify any highways impacts, alongside the support of proposals that seek to improve public transport provision, and walking and cycling facilities. However, the Framework takes this further, stating that applications for development should give priority to pedestrian and cycle movements (117) and focusses on developments having a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places (109). The policy should be given <u>moderate</u> weight, and the vision-led approach advocated by the Framework should be favoured and given full weight in this instance.
Policy CS12: Green Infrastructure	Broadly Consistent	This policy is broadly consistent with the NPPF, which seeks to provide net gains for biodiversity and establish coherent ecological networks (187), and gives great weight to conserving and enhancing landscape and scenic beauty in National Landscapes (189). The policy should be given <u>full</u> weight.
Policy CS13: Green Space, Sport and Recreation	Broadly Consistent	The aims of this policy are broadly consistent with the NPPF, supporting the provision of sports facilities and accessible green space, however there is currently no up-to-date open space strategy, and Paragraph 103 states that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. The policy should be given <u>full</u> weight.
Policy CS14: Housing Type and Size	Broadly Consistent	The policy is consistent with the NPPF in that the Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities. For full consistency, this policy should also include reference to an up-to-date evidence base. The policy should be given <u>full</u> weight.
Policy CS15: Housing Density	Broadly Consistent	The policy is consistent with the aims of the Framework in that it contains minimum density standards depending on a Site's location (urban or rural) and states that planning applications will be

		refused should they fail to make efficient use of land (para 130). It however does not recognise that higher densities could be possible outside of the primary urban locations where they are well-related to transport infrastructure (paragraph 109). The policy should be given <u>moderate</u> weight.
Policy CS16: Affordable Housing	Part-consistent	The 35% affordable housing requirement is consistent with the Framework in terms of delivering affordable housing on site. With regard to affordable housing mix, the policy requires a 70:30 split of affordable rent and social rent. Paragraph 66 requires that the mix of affordable housing required meets identified local needs, across social rent, affordable home ownership tenures etc. The policy also includes an allowance for affordable housing in sustainable locations in the Green Belt for a local need – in line with para 154f. However, the policy doesn't account for the Golden Rules of the Framework which requires the delivery of at least 50% affordable housing on grey belt sites. The policy should be given <u>moderate</u> weight and the Golden Rules in the Framework should be given full weight in this instance.
Policy CS18: Climate Change	Consistent	This policy echoes the Frameworks priority in steering development away from flood risk areas and required developments to demonstrate that they are adequately defended and safe over their lifetime. This policy intention is also aligned with the Framework's intention to transition to a net zero future through renewables and low carbon energy and seeks to account for water demand and scarcity. The policy should be given <u>full</u> weight.
Policy CS19: Development and Design Principles	Consistent	This policy reflects Section 12 of the Framework, ensuring that new development is visually attractive and locally distinctive, integrating well with the local context and character of the area. The policy should be given <u>full</u> weight.
Policy CS20: Heritage and the Historic Environment	Consistent	This policy reflects Section 16 of the Framework, giving high priority to the preservation, protection, and enhancement of heritage assets and historic environment. The policy should be given <u>full</u> weight.

Emerging Local Plan

- 4.9 Work is currently underway to produce a new GBC Local Plan that will set the strategy for the District's future development from 2025 to 2040.
- 4.10 Between April and July 2018, GBC undertook a Regulation 18 Stage 1 consultation on Site Allocations: Issues and Options and Development Management Policies, including the following documents:
- Part 1 Site Allocations: Issues and Options – Regulation 18 Consultation
 - Part 2: Development Management Policies Document – Regulation 18 Consultation
 - Emerging Local Plan Partial Review, Site Allocations and Development Management Policies (Regulation 18 – Stage 2) Consultation
- 4.11 In October - December 2020, the Council undertook a Regulation 18 Stage 2 Consultation – Preferred Approach in which they received representations and gathered additional information to inform the amount of housing, employment and retail development needed in the Borough to 2036.
- 4.12 Gravesham's latest Local Development Scheme (LDS), adopted in March 2025, aimed to undertake the Regulation 19 consultation in July 2025, with submission to the Inspectorate in December 2025, and adoption in December 2026.
- 4.13 In February 2026, a draft Regulation 19 Plan was approved by Cabinet to go out to public consultation. This is anticipated to occur in Spring 2026, although timescales for the consultation are yet to be published. Limited weight can be given to the emerging plan given the early stages of the plan making process

Supplementary Planning Guidance

- 4.14 Supplementary planning guidance in existence that is of relevance to the application includes:
- Residential Layout Guidelines SPG2 (amended June 2020)
 - Design for Gravesham - Design Code SPD (May 2024)
 - Planning Guidance on the Council's Waste Collection Requirements (August 2024)
 - KCC Development Contributions Guide (March 2007)

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- Kent Vehicle Parking Standards (February 2025)
 - Gravesham Borough Council Open Space Standards Paper (August 2016)
 - Kent Downs AONB Management Plan
 - Gravesham Landscape Sensitivity and Capacity Study (March 2016)

4.15 The advice and evidence base contained within the above documentation has informed and been taken into consideration in the evolution of the application proposals.

Are relevant policies or the policies most important for determining the application out of date?

- 4.16 The above policy review has established that key policies relevant to the application are inconsistent with the Framework, particularly those policies relevant to the location and provision of housing (Policy CS02). Footnote 8 clarifies that for applications involving the provision of housing, where a local planning authority such as Gravesham is unable to demonstrate a five-year supply of deliverable housing sites, the policies should be considered out of date. Accordingly, Paragraph 11d of the Framework is engaged in this instance and planning permission should be granted unless 11di) or 11dii) indicate that permission should be refused.
- 4.17 With regard to the development management policies, these are largely consistent with the aims of the Framework. However, National Policy has moved on since the publication of the Local Plan (in 2014), and greater emphasis is now placed on pedestrian and cycle-led schemes for example, alongside planning positively for the provision of community facilities and shared spaces.
- 4.18 The GBC Development Plan is over five years old and fails to identify sufficient land to meet its current housing needs. Furthermore, the most relevant policies are not consistent with the policies within the Framework, and as such, it can be considered that the policies for determining this planning application are out-of-date. Therefore, the NPPF and NPPG are material considerations in decision-taking, in accordance with Paragraph 232.

5. PRINCIPLE OF DEVELOPMENT AND GREY BELT ASSESSMENT

- 5.1 This Section sets out the principle of development for the scheme, setting out a comprehensive “grey belt” case for why the development is “not inappropriate” in the Green Belt. Overall, the proposal represents an excellent example of sustainable development, contributing toward meeting significant unmet market and affordable housing needs in the borough, in a highly sustainable location adjacent to two train stations, whilst providing a host of other public benefits and infrastructure improvements for the community.

Policy Background

- 5.2 In December 2024, the Government published an updated version of the NPPF, which included revised policies relating to development within the Green Belt.
- 5.3 As per the previous iteration of the Framework, Paragraph 153 outlines that when considering planning applications, substantial weight should be assigned to any harm to the Green Belt, including its openness. It states that inappropriate development is inherently harmful to the Green Belt and should only be approved in ‘very special circumstances’. Such circumstances exist only when the potential harm to the Green Belt, due to inappropriateness and any other resulting harm, is clearly outweighed by other considerations.
- 5.4 However, a new exceptions test was introduced at Paragraph 155. This states that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.*

Grey Belt Assessment

- 5.5 This sub-section assesses the impact of the development of the Site on the Green Belt, along with the Site's contribution to the Green Belt purposes, in the context of the revised Framework and PPG guidance.

Grey Belt Land

- 5.6 As per the NPPF glossary, "grey belt" is defined as:

"Land in the Green Belt comprising previously developed land and /or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in Paragraph 143. Grey belt excludes land where the application of the policies to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

- 5.7 The applicant has undertaken a Green Belt Assessment of the application Site (prepared by Icen Projects, October 2025), to assess the Site's contribution to Green Belt purposes (a), (b) and (d) in line with the above definition, in the context of the latest policy and guidance. The conclusions from this assessment are set out in the table below.

Conclusions in relation to Green Belt purposes

Contribution to Green Belt purposes		Harm to Green Belt Purposes	
Purpose a	None	Purpose a	Moderate
Purpose b	None	Purpose b	None
Purpose c	Moderate	Purpose c	Moderate
Purpose d	None	Purpose d	None
Purpose e	-	Purpose e	-

- 5.8 From Table 7.1 it is clear that the application site does **not contribute strongly** to purposes (a), (b) and (d) of the Green Belt.
- 5.9 Within the definition, it is also necessary to consider whether the Site is subject to any Footnote 7 constraints that would provide a strong reason for refusing or restricting development in line with the definition of grey belt. Footnote 7 covers the following: habitats sites (and those sites listed in Paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets or archaeological interest referred to in Footnote 75); and areas at risk of flooding or coastal change.

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- 5.10 In this case, the footnote 7 constraints of relevance to the Site include the National Landscape, heritage assets and areas of flood risk. The Site lies adjacent to the Kent Downs National Landscape. An LVIA has been prepared by Iceni Projects to assess any landscape and visual impacts to the character of the National Landscape. Overall, as the Site is not located within the National Landscape itself, would only be visible from very limited, localised locations, and the proposal has been designed to sensitively mitigate any impacts on its setting, it is considered that this would **not** provide a strong reason for refusing or restricting development.
- 5.11 Furthermore, whilst there is a heritage asset on the southwestern boundary of the Site (Grade II Listed Norwood Farmhouse), it has been identified that the proposal would result in “no harm” to the setting and significance of the asset, or any other historical assets. A full balancing exercise is carried out in the Heritage Statement, prepared by Iceni Projects.
- 5.12 The Site lies wholly within Flood Zone 1, although some small areas within the Site are identified to be at risk from surface water flooding. All built development within the site boundary, including the access, is proposed to be located outside of existing surface water risk pathways. The submitted FRA and Drainage Strategy demonstrates that the development would be safe for its lifetime and will not increase flood risk elsewhere.
- 5.13 Therefore, it is considered that no strong reason exists to refuse or restrict the development under Footnote 7. As a result, the Site would meet the definition of grey belt as set out within the NPPF.

“Not Inappropriate” Development

- 5.14 The applicant considers that this development should be considered as ‘not inappropriate’ development within the Green Belt, as the proposals meet all the criteria outlined in Paragraph 155 as follows:

Criterion a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt.

- 5.15 As outlined above, the application Site is considered to meet the definition of grey belt. The Site represents a very small portion of the existing Green Belt within the plan area, and whilst development of the Site would involve a loss of open countryside (purpose c), it would have no significant effect on the wider Green Belt, which would remain as countryside. This is reinforced by the Site being well-contained by built form on three sides.
- 5.16 Therefore, the proposed development would not undermine the overall purposes of the Green Belt when taken together. The development would therefore comply with criterion (a) of Paragraph 155.

Criterion b) *There is a demonstrable unmet need for the type of development proposed*

Housing Needs

- 5.17 The NPPF (2024) is clear that as part of the Government's objective to significantly boost the supply of housing, a sufficient amount and variety of land can come forward where it is needed, with the overall aim to meet the area's identified housing need including an appropriate mix of housing for the local community (paragraph 61).
- 5.18 The adopted Core Strategy established a requirement for 6,170 new dwellings across the plan period, delivered at a variable rate as follows; at least 325 dwellings per year for 2011/2012 – 2018/2019, at least 363 dwellings per year for 2019/2020 – 2023/2024, at least 438 dwellings per year 2024/2025– 2027/2028. Since this time, the revised NPPF has been published (December 2024) introducing a new standard method calculation and an increased housing requirement for Gravesham. Under the new NPPF, Gravesham's housing requirement has increased to 676 dwellings per annum, and the requirement is now to deliver 3,380 houses over 5 years (excluding any buffer).
- 5.19 The most recent housing land supply position was published in February 2025 to reflect the revised standard method figure (*Five-Year Land Supply Statement 2024-2029*). This confirms that the Council can only demonstrate a 3-year supply of deliverable housing sites, which represents a significant shortfall. Specifically, there is a supply shortfall of 1,603 dwellings over the next five years against Gravesham's local housing need figure, with a 20% buffer applied due to past under delivery. This represents a dire housing needs situation.
- 5.20 The most recent Housing Delivery Test results published December 2024 show that the Council delivered only 59% against its housing requirement, which is very low and triggers the presumption in favour of sustainable development.
- 5.21 In the case of applications involving housing provision, footnote 56 of the NPPF states that demonstrable unmet need should consider the lack of a five-year supply of deliverable housing sites or where the Housing Delivery Test falls below 75% of the housing requirement over the previous three years. As demonstrated, Gravesham cannot demonstrate a 5-year housing land supply, and the latest Housing Delivery Test fell below 75%. This represents a significant shortfall, and thus there is a clear and pressing unmet need for residential development in the borough.
- 5.22 The proposal to deliver up to 725 homes is set out in the context of an acute housing shortage both across the country, and in Gravesham Borough. The proposed development can therefore help to address this specific need as well as supporting economic growth and infrastructure provision.

Affordable Housing Needs

- 5.23 In the Kent Analytics Report published in January 2025, it was noted that Gravesham delivered 119 additional affordable dwellings in 2023-2024 (representing 40.6% of the overall dwellings provided). However, the vast majority of these homes were delivered within Gravesend, and it is considered that there is a need for wider distribution of affordable dwellings across the borough to enable residents to continue living in their local community.
- 5.24 Gravesham have not published up-to-date evidence regarding affordable housing completions. However, as set out in the Making the Case for Gravesham: Evidence Base Final Report (October 2023), Gravesham currently has an affordable housing waiting list of 846 households. The number of people accessing the Housing Options services at the council has increased 31% from 2019 - 2020 to March 2023. The number of people in temporary accommodation has also increased from 100 in March 2020 to 207 in March 2023 (equivalent to 107% increase).
- 5.25 Furthermore, affordability is an issue in Gravesham. The average house price in Gravesham in July 2025 was £345,000, significantly higher than the national average (£296,000). The house prices in Gravesham are 8.14 x average resident earnings, higher than the national average, and far higher than the identified “affordability threshold”. This suggests that local housing options remain out of reach for many of Gravesham’s residents.
- 5.26 Therefore, the provision of up to 363 affordable dwellings would contribute toward meeting the identified affordable housing needs in the Borough, providing residents with a greater opportunity to access housing in their local area.

Education Needs

- 5.27 Data from the Department of Education shows that primary schools within the Proposed Development Planning Area are currently operating at 95.1% capacity¹.
- 5.28 In the pre-app meeting held with KCC Education in January 2025, it was confirmed that KCC would welcome the provision of a new primary school to meet the future needs in Gravesham Rural South, particularly when accounting for forecast housing growth. It was noted that the existing primary school in Meopham is constrained and unlikely to be suitable for expansion. There is also no primary school in Sole Street. It was therefore agreed that providing a school on this Site would not only contribute toward meeting forecast needs but also be beneficial in terms of sustainability by promoting walking/ cycling to school.

¹ Para 2.4, Education Note prepared by Iceni Projects

Criterion c) *The development would be in a sustainable location, or which can be made sustainable, with particular reference to Paragraph 110 and 115 of this Framework*

- 5.29 Paragraph 110 reinforces the need for significant development to be focused on a location which is or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. NPPF Paragraphs 110 and 115 emphasise that sustainable locations limit the need to travel and offer a genuine choice of transport mode.
- 5.30 The Site is within a highly sustainable location. The Village of Hook Green lies immediately to the west of the Site, which is described as a Tier 2 settlement within the adopted Local Plan. The Village of Sole Street lies immediately to the north-east, beyond the railway line. This is a smaller village and is described as a Tier 4 settlement within the adopted Local Plan. Both Hook Green and Sole Street have a railway station that is walking distance from the Site. As such, the Site is within close proximity to a range of services and facilities accessible on foot or via cycle. For example, the following lie within 1km of the Site:
- Meopham Community Academy (Primary School)
 - National Autistic Society - Helen Allison School (Secondary School)
 - St Pauls Catholic Church
 - Meopham Station Post Office
 - Childcare Nursery Facilities
 - A range of Public Houses, Restaurants and Cafes
 - Shops and Local business including a Hairdressers and a Bakery
- 5.31 Meopham Secondary School also lies approximately 2km to the southwest.
- 5.32 The proposed development will also include a Local Centre, with up to 500sqm of Class E uses such as a convenience store, alongside a 2-form intake primary school and other community facilities. This will allow future residents to access everyday services and facilities within walking distance from their home.
- 5.33 For destinations slightly further afield, the Site is already extremely well served by public transport. Both Sole Street Railway Station and Meopham Railway Station are within comfortable walking/cycling distance of the Site and offer frequent and direct services to London Victoria in 35-45 minutes from Meopham Station, and 49 minutes from Sole Street via South Eastern Service. Both Sole Street and

Meopham Stations also offer services towards Rochester and Chatham in c.10 minutes where it is possible to change for direct services towards Gravesend, Ebbsfleet International, Stratford International or St Pancras International all in under 40 minutes (also via South Eastern service).

- 5.34 Furthermore, the scheme has been designed to ensure active travel routes are prioritised within the Site, for both travel and recreational purposes. The proposals include enhanced walking and cycle connections to both train stations to ensure safe and efficient access for residents. There is also an active travel zone proposed along the southern end of Norwood Lane to restrict vehicular access to residents and bus/ emergency vehicles only. These improvements will create direct and sustainable connections to the surrounding area, encouraging active travel for both new and existing residents.
- 5.35 The Site is also well-located in terms of access to local bus services. There are a number of bus stops located along Wrotham Road (also within walking distance of the site) offering services towards Gravesend, Sevenoaks, Borough Green, Vigo Village and Meopham Green, with school buses serving schools in Gravesend and Dartford at peak periods. The proposals include a one-way bus loop in the southwestern corner of the Site, adjacent to the proposed primary school.
- 5.36 As such, it is considered that the Site is in a sustainable location which limits the need to travel, and offers a genuine choice of transport modes, prioritising sustainable transport methods, and therefore meet the requirements of criterion (c).

Criterion d) *Where applicable the development proposed meets the Golden Rules requirements as set out in Paragraph 156 and 157.*

- 5.37 These are considered as detailed below:

'Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

- a. Affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework, or (ii) until such policies are in place the policy set out in paragraph 157 below;*
- b. Necessary improvements to local or national infrastructure; and*
- c. The provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.'*

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- 5.38 Of the up to 725 homes proposed, 50% of these will be affordable (up to 363), in accordance with Paragraph 157.
- 5.39 Paragraph 156 (b) requires that necessary improvements to local or national infrastructure are provided through major development proposals. The scheme has been conceived to be truly infrastructure-led, by securing vital infrastructure required to underpin housing development in Hook Green/ Meopham. This includes the provision of a 2-form intake primary school, the local need for which has been identified by Kent County Council Education, alongside active travel links, sports pitches and community facilities. Necessary infrastructure contributions will also be provided as part of the proposal, consistent with NPPF paragraph 12 and Gravesham Policy CS10 on infrastructure planning.
- 5.40 Paragraph 156(c) requires the provision of good quality open space within a short walking distance of residents' homes. Paragraph 159 of the NPPF sets out green space requirements as part of the Golden Rules: to make a positive contribution to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan.
- 5.41 The proposal has been developed as a landscape-led scheme, with a variety of green open spaces at different scales and typologies provided throughout the development. Over 50% of the scheme will be delivered as Public Open Space and sports uses (c. 22.5 ha), as demonstrated in the Land Use parameters plan. This far exceeds Local policy standards for open space provision, alongside Fields in Trust guidance. With regards to accessibility, the open space provided will be within 10 minutes' walk of residents' homes. In fact, the landscape strategy has been designed to ensure that green, open spaces are well distributed across the Site to provide residents with open space on their doorstep, including play areas, allotments and dog parks.
- 5.42 The proposed open space has been designed to integrate seamlessly with the area's landscape character, including the KDNL. The scheme also incorporates and enhances existing natural features to support biodiversity and promote nature recovery, as shown on the submitted Landscaping Strategy. Therefore, all the provisions of Paragraph 159 are met.
- 5.43 Overall, it is considered that the proposed development complies with all the Golden Rules, which should be afforded significant weight in the planning balance. Furthermore, all the necessary policy requirements are met to demonstrate that the proposals would **not** be regarded as inappropriate development in the Green Belt, and this is the policy context within which the application should be considered.

Principle of Development

- 5.44 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the statutory development plan unless material considerations indicate otherwise. As highlighted in Section 5.0, the statutory development plan comprises the Gravesham Local Plan Core Strategy (2014), Gravesham Local Plan First Review (1994) – saved policies; and Kent County Council Minerals and Waste Local Plan 2024 –30 (2020).
- 5.45 Policy CS02 of the Core Strategy specifies the spatial distribution of development across the borough, including 3,890 new dwellings in the identified “Opportunity Areas”, and around 2,280 new dwellings on other sites in the urban area and rural settlements inset from the Green Belt. However, as mentioned above, the Core Strategy only identifies sufficient land to meet an overall housing requirement of 6,170, to be delivered at a variable rate as follows; at least 325 dwellings per year for 2011/2012 – 2018/2019, at least 363 dwellings per year for 2019/2020 – 2023/2024, at least 438 dwellings per year 2024/2025 – 2027/2028. The new housing requirement for Gravesham is 676 dwellings per annum, which is significantly higher than the figures predicted for the 2024/2025 – 2027/2028 period. Therefore, sufficient land has not been identified within the Plan to meet the housing needs of the borough, and additional sites will need to be identified, outside of the areas specified within the spatial strategy. This could include Sites which fall outside of settlement boundaries, and sites within the Green Belt. Giving full weight to Policy CS02 as it currently stands would clearly frustrate the delivery of housing in the borough and therefore the spatial policies need to be given **limited weight** in the determination of this application.
- 5.46 Furthermore, when considering the overall spatial layout of Gravesham, opportunities for genuinely sustainable residential development are limited. A large proportion of the Borough is covered by the National Landscape designation and land safeguarded for the Lower Thames Crossing. Outside of this, there are large rural areas with no sustainable transport connections or available services and facilities. The Site was listed as a potential draft site allocation (GBS-E) within the Regulation 18 version of the Local Plan (2020) for approximately 520 dwellings, which demonstrates that it was considered by GBC to be a suitable and sustainable location for development. Meopham itself was also earmarked as a key location for residential growth, due to its sustainable transport connections. Therefore, this Site presents an ideal opportunity to bring forward genuinely sustainable residential growth.
- 5.47 Policy CS02 further notes that, in the rural area, development outside of settlements will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan. In this case, the introduction of “grey belt” does mean that development on this Site would be compatible with national policy.

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- 5.48 Notwithstanding, it is clear and accepted by the Council that Gravesham are unable to demonstrate a 5YHLS, with a published supply position of only 3 years, and that recent housing delivery has been poor. In this context, NPPF footnote 8 states that policies most relevant for determining applications can be considered out-of-date, including Policy CS02. As a result, the tilted balance at Paragraph 11d is engaged and the presumption in favour of sustainable development applies, where planning permission should be granted unless any adverse impacts of doing so would **significantly** and **demonstrably** outweigh the benefits. This is the context within which this planning application should be determined.
- 5.49 The subsequent sections of this Statement set out relevant technical policy and design considerations and undertake a balancing exercise of the harms and benefits of the proposal.

6. ASSESSMENT OF PROPOSED DEVELOPMENT

- 6.1 This section sets out the technical work that has been prepared as part of the application, how it has informed the proposed development, and any mitigation that may be required as a result of the scheme. This has been considered in the context of relevant national, regional and local policy. Full details of the technical work undertaken can be found in the relevant reports that accompany this application, alongside the relevant chapters of the Environmental Statement.

Design

- 6.2 As this is an outline application, the layout and appearance are not fixed, however the Indicative Masterplan and DAS demonstrate how the design of the scheme has been informed by relevant local and national policy, including the Gravesham Design Code (2024), to ensure that a high-quality proposal will be delivered.
- 6.3 In accordance with Policy CS19, the indicative proposals have taken into consideration the wider context and opportunities and constraints to develop an appropriate scheme, that is visually attractive, fit for purpose and locally distinctive, and integrates with the character of both Meopham/ Hook Green and Sole Street, whilst ensuring the unique character of both villages is maintained.

Housing Mix

- 6.4 There is no policy in the Local Plan specifying the preferred housing mix, although Policy CS14 states that the Council will expect new housing development to provide a range of dwelling types and sizes, the existing character of the area and evidence of local need to create sustainable and balanced communities. This reflects the aims and objectives of the NPPF, where Paragraph 61 states that the overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.
- 6.5 An indicative housing mix has been provided for the outline scheme, split over market and affordable housing, as follows:

Unit Size	Percentage Mix	Housing Numbers
1-bed	10%	72
2-bed	31%	228
3-bed	40%	287

4+ bed	19%	138
Total	100%	725

6.6 The final housing mix will be established through the future RMA(s) but will be informed by the North Kent Strategic Housing and Economic Needs Assessment (March 2015) (or more recent document) alongside consultation with officers and the Council's housing team, and consideration of market signals.

6.7 In relation to affordable housing, the proposed development seeks to deliver up to 363 affordable homes, equating to 50% of the total residential provision. This exceeds the policy requirement of 35% set out in Policy CS16 of the Core Strategy and aligns with the Frameworks Golden Rules for development in the Grey Belt. Policy CS16 further states that the Council will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing. The aim is for the proposed development to provide this tenure mix, subject to further conversations with housing officers and registered providers and will ultimately be determined through future RMAs.

Residential Quality

6.8 Paragraph 153 (f) of the NPPF requires that new development creates places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. This includes the need for new dwellings to meet the nationally described space standard.

6.9 The submitted DAS outlines key design principles to ensure that the detailed design for the site will adhere to the relevant requirements through future RMAs. Specifically, all residential dwellings will meet at least the minimum space standards. In accordance with the Gravesham Design Guide (2024) each new dwelling will also include a private outdoor space of a usable size, of an orientation to ensure no overlooking or loss of privacy. Furthermore, the residential units will be designed to be 'tenure blind' to ensure homes across tenures are indistinguishable from one another in terms of their character and appearance, to support social integration.

6.10 Fixed details regarding materials and other design related elements will be provided at the Reserved Matters stage. There is no housebuilder currently attached to the scheme, and therefore it is the intention of this outline application to secure a robust consent, including suitable design parameters, to ensure a high-quality scheme is brought forward which is reflective of the character and appearance of the surrounding area.

Density, Height and Scale

- 6.11 Policy CS15 requires development proposals to make efficient use of the site area in a manner that is compatible with the character of the surrounding area and expects development in the rural area to achieve a minimum density of 30 dwellings per hectare. This reflects the aims of Paragraph 129 and 130 of the NPPF, in which proposals should make an efficient use of land, to optimise the site area to meet as much of the identified need for housing as possible.
- 6.12 The proposal complies with the minimum density requirement, with a density of 40 dph proposed across the residential parcels. This ensures the site area is optimised, whilst also responding sensitively to the surroundings.
- 6.13 With regard to heights, the Building Heights Parameter Plan shows the maximum height of development is 3 storeys, limited to those areas further from sensitive residential and landscape receptors. Across the majority of the Site, the maximum building height will be limited to 2/ 2.5 storeys typical of a traditional dwellinghouse, to reflect the character and appearance of both Hook Green and Sole Street.

Landscape and Open space

- 6.14 Policy CS13 states that the Council will seek to make adequate provision for green spaces, playing pitches and other sports facilities, with consideration for quantity, quality and accessibility, in accordance with an adequate, up to date and relevant evidence base.
- 6.15 The Open Space Standards Paper (2016) sets out guidance for the provision of open space, however this is now more than 9 years old. It also does not set quantity standards for natural and semi-natural green space, nor parks and recreation space for rural areas. Therefore, we have referred to the Fields in Trust (FIT) guidelines as set out below:

Table 7.1 Open Space Provision on Site against Fields in Trust Guidance

Open Space	Quantity standards for new provision (ha/1000)	Open Space requirements for the Site (estimated 1,813 population) (ha)	Open Space provision on site (indicative)
Parks and Gardens	0.80	1.46	1.49
Amenity Greenspace	0.60	1.10	4.14
Natural and Semi-Natural Greenspace	1.80	3.29	11.84
Equipped/ Designated Play Space	0.25	0.46	0.47
Informal Play	0.3	0.55	0.57

Outdoor Sports Pitches	1.2	2.19	2.64
Courts, Greens, Tracks and Trails	0.4	0.73	1.40
Total required	5.35 ha / 1000	9.76 ha	22.55

- 6.16 The table above outlines the open space requirements per 1,000 people and calculates the necessary provision for the anticipated population increase of 1,813 (based on 2.5 persons per household). This ensures that all residents have convenient access to open spaces, with sufficient land allocated to meet both new and existing community needs while enhancing overall well-being. The proposed development exceeds the standards for each typology against the Fields in Trust (FIT) guidance.
- 6.17 Overall, a total of 22.5 ha of Public Open Space is provided across the Site (more than double the required area under the FIT guidelines). This represents a significant benefit of the scheme, for both existing residents of Meopham and Sole Street and the future residents of the scheme.

Landscape and Visual Impact

- 6.18 A Landscape and Visual Impact Assessment (LVIA) has been prepared as part of the Environmental Statement to fully assess the likely significant effects of the proposed development in relation to landscape and visual effects on the site and in the surrounding area. A Green Infrastructure Plan has also been submitted in support of this application to demonstrate the indicative landscape proposals including the provision of open space and planting.
- 6.19 The Site comprises an ordinary arable field (mainly under cereal crop), bound by trees, hedgerow and scrub, with two woodland blocks central to the Site. There is a degree of tranquil character to the Site, although this is reduced by the audible intrusion from passing trains and vehicles in proximity to the Site, while intervisibility with nearby built forms diminishes any strong perception of remoteness. Overall, the character of the Site is assessed as being of medium landscape quality and medium landscape sensitivity.
- 6.20 The proposed development will result in the loss of arable cropland, and it is inevitable that some adverse effects would occur to the landscape and visual amenity of the Site during construction activities. However, a number of mitigation measures are proposed to limit any adverse impacts, as follows:
- A Construction and Environmental Management Plan ('CEMP') will be agreed with the Local Planning Authority before the construction of the Proposed Development commences, and it will include measures to control impacts from construction activities

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- The eastern part of the Site will remain free of built form to provide a sympathetic response to the immediate setting of the Kent Downs National Landscape and Camer Country Park;
 - Areas of woodland, hedgerow vegetation and trees within the Site will be retained, and extensive additional planting is proposed, including a new woodland belt through the centre of the Site;
 - SuDS features such as swales and basins will be introduced as landscape elements to contribute positively to the character and function of the landscape;
 - Incorporating a central spine of open space in order to deliver a connected network of green infrastructure;
 - Site lighting will be limited and sensitively designed using methods such as light shielding to ensure tranquillity is retained and any impact on dark-skies is minimised;
 - Retaining the existing PRoW, and proposing additional active travel routes within the Site to enhance its recreational value within the landscape; and
 - Reflecting the existing scale and typology of built form in the surrounding context, limiting the maximum height of proposed built form to 3 storeys.

6.21 By year 15, the proposed vegetation will be established, integrating the Proposed Development into the surrounding landscape. While a moderate adverse (significant effect) on the cropland will remain due to its complete loss within the Site, typically all other landscape effects that are anticipated to arise will be beneficial in nature by this point, including significant long-term beneficial effects on the grassland and public footpath network.

Impact on Kent Downs National Landscape

6.22 The Site is not covered by any statutory or non-statutory designations for landscape or heritage quality or value. However, the Site lies adjacent to the Kent Downs National Landscape Area (KDNL) and Camer Park Country Park. Paragraph 189 of the NPPF states development within the setting of a National Landscape should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Policy CS12 of the Local Plan also states that the greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting.

6.23 The LVIA gives due consideration to the relevant policy documents, including the Kent Downs National Landscape Setting Position Statement (2024), Kent Downs Landscape Character Assessment Update (2023) and Kent Downs Management Plan (2021) in its assessment of the Site, in accordance with Local Plan policy.

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- 6.24 It is concluded that, due to the undulating nature of the landscape setting and the containment provided by tree belts and woodland blocks, the extent to which the Site contributes to the setting of the National Landscape is limited. Furthermore, visibility is generally localised and restricted to those areas within the immediate vicinity, with only limited views from the National Landscape into the Site when viewed from the Public Right of Way (PRoW) that crosses the adjacent fields.
- 6.25 Furthermore, the Site's character is already influenced by the adjoining urbanising features of development at Sole Street and Hook Green, in addition to the interface with the railway infrastructure and the pylons and high-voltage wires that oversail the Site. These features detract from what would otherwise be a rural landscape.
- 6.26 The proposals have also been designed to mitigate any adverse impacts on the setting of the KDNL. No built development is proposed on the eastern side of the Site, past the boundary of Camer Park, and this land is instead safeguarded for public open space, with a high level of planting proposed. This will ensure the development is well screened and would continue to positively contribute to the setting of the National Landscape.
- 6.27 It is acknowledged that, during the construction phase, and from exceptionally localised parts of the KDNL, there will be a negligible adverse (not significant) effect on the sense of tranquillity and rurality of the Site. At year 1, a neutral (not significant) effect will occur, as the overall integrity of this designated landscape will remain unaltered, and appreciable effects on the dark skies at night are unlikely to occur as floodlighting will not form part of the Proposed Development. However, by year 15, there will be a negligible beneficial (not significant) effect for the KDNL due to the proposed landscaping scheme.
- 6.28 Overall, the proposed development will be well related to the existing settlement and has been sensitively located and designed to ensure that there will be no significant adverse impact on the setting of the KDNL. In fact, the LVIA concludes that the effects on the KDNL will reduce over time, and following establishment of mitigation vegetation, would result in a negligible beneficial impact. Therefore, the development accords with the aims of local and national policy with regard to minimising any adverse impacts on, and the conservation and enhancement of, the KDNL.

Agricultural Land

- 6.29 A detailed Agricultural Land Classification has been carried out over the Site, which identifies 42.1 ha of Grade 2 agricultural land within the Site. Best and Most Versatile (BMV) agricultural land is defined in the NPPF as land within Grades 1, 2 and 3a of the Agricultural Land Classification.
- 6.30 Paragraph 187 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and

ecosystem services – including the economic and other benefits of the best and most versatile agricultural land. Therefore, the NPPF does not prevent development of BMV land, it requires only that the economic and other benefits of BMV land be recognised. In this case, the economic benefits of a land parcel of this size are limited, and the food production benefits, when viewed in the context of the food production of the UK, are minimal.

- 6.31 With regard to plan-making, footnote 65 of the NPPF also states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. An assessment has therefore been carried out of the agricultural land quality in the surrounding area, which demonstrated that there is an area of Grade 1 agricultural land to the north of the Site, Grade 2 agricultural land surrounding where the Site is situated, and areas of undifferentiated Grade 3 further afield. Overall, there is no evidence to suggest a similarly sustainable site that could support this development, with a lesser percentage of BMV, is likely to be found.
- 6.32 Furthermore, development of agricultural land of BMV quality has been permitted in the surrounding area (e.g. application ref: 20141214 for the development of up to 400 dwellings which was approved on land of Grade 2 quality) and will continue to need to be permitted to meet the increasing housing needs of the Borough. There are also many appeal decisions which recognise the need for development on Best and Most Versatile (BMV) land.
- 6.33 Therefore, the Agricultural Land Report prepared by Kernon Countryside Consultants confirms that limited weight should be given to this loss of agricultural land.

Transport

- 6.34 A Transport Assessment and Travel Plan have been prepared by TTC to accompany this application. The Assessment confirms that the development will not result in an unacceptable impact on highway safety, nor would residual cumulative impacts on the road network be severe, in accordance with NPPF Paragraph 116 and Local Plan Policy CS11.
- 6.35 A detailed Access Design (ref: 211206-09) and a Movement & Access Parameter Plan (ref: DL02 B) have also been prepared to illustrate the proposed access and internal road network, alongside the active travel routes and bus corridor.

Access and Layout

- 6.36 As per the description of development, matters of access are submitted in detail as part of this application. The primary vehicular access to the development is proposed from Camer Road via a roundabout. This will help to reduce vehicle speeds along Camer Road, as well as providing a gateway to the Site, providing a balance of priority for existing road users and new site users. The location and form of the vehicular access was agreed in principle with KCC during pre-application discussions.

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- 6.37 A secondary access is proposed from Norwood Lane. The Norwood Lane / Camer Road junction will be restricted from through traffic (aside from local buses), and the section of Norwood Lane to the north of the proposed secondary access will be pedestrianised, to provide a dedicated active travel route.
- 6.38 A bus route is proposed to run through the Site between the primary access on Camer Road and secondary access on Norwood Lane. A bus stop will be located in the centre of the Site, adjacent to the primary school, to provide access to public transport services within approximately 400m of all residential dwellings.
- 6.39 In line with the Kent Design Guide, a secondary emergency access point will be provided from Norwood Lane to the north of the secondary access, with removeable bollards to prevent daily use.
- 6.40 The internal layout and access arrangements are shown indicatively on the Access and Movement parameter plan. This demonstrates how the scheme could accord with the principles set out within the Kent Design Guide and prioritise active modes of travel. A network of active travel routes will be provided throughout the Site and connecting to the existing footpath network. Pedestrian and cycle access is provided at two points along Norwood Lane, providing safe and convenient access to Meopham Station and local amenities from all locations within the Site. Another active travel connection is provided on the northeastern edge of the Site, connecting to Camer Road, providing access to Sole Street Station.
- 6.41 All active travel routes will be direct, well connected, well lit, attractive and overlooked to appeal to pedestrians and cyclists. Cycle facilities will be designed in line with LTN 1/20, including segregated cycle routes and 2m wide footways.

Sustainability and Impact on Highway Network

- 6.42 The methodology for the traffic assessment was agreed with KCC during pre-application engagement, which confirmed the need to use the Kent Transport Model (KTM) to assess the traffic impacts of the proposals. The results of the KTM are set out in the Transport Assessment. This demonstrates that there are no severe impacts forecast on the traffic network as a result of the proposed development.
- 6.43 Furthermore, any traffic impacts will be mitigated by proposed measures to promote a shift to active and sustainable transport modes, in accordance with NPPF paragraphs 115 and 116.
- 6.44 In line with the requirements of NPPF paragraph 110 and Local Plan policies T1 and T3, the Site is well-located in terms of wider connectivity, with a range of everyday facilities within walking or cycling distance, and the proposed development seeks to support and enhance this. There is currently no footway connected to the Site along Norwood Lane. Therefore, to support the sustainability of the area and promote safe walking routes, it is proposed to pedestrianise this road, limiting through traffic to

the residents of Norwood Lane. A connection east towards Sole Street Station is also proposed, via a pedestrian crossing point across Camer Road, linking to the existing northbound bus stop.

- 6.45 A Framework Travel Plan has been prepared to reduce the dependence of residents on travel by car. The Travel Plan aims to increase awareness and encourage use of sustainable transport modes. The sustainable transport measures and options will be presented to the new residents, offering them a wide choice to travel more sustainably.
- 6.46 Overall, in line with Paragraph 115, the scheme promotes sustainable transport modes as the primary mean of travel. On the basis of the information presented in Transport Assessment, it is considered that the proposed development can be accommodated within the local area with safe and suitable access provided for all users. As such, there is no reason for the application to be refused on highways grounds.

Parking and refuse

- 6.47 Details of parking and refuse provision will be set out as part of future RMAs in accordance with KCC standards.

Flood Risk and Drainage

- 6.48 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by GTA Civils & Transport Ltd (GTA). This confirms that appropriate mitigation measures have been incorporated to reduce the risk of all forms of flooding to future occupiers and to ensure there is no increase in flood risk elsewhere. As such, the proposal complies with the requirements of Policy CS18 of the Local Plan as well as Paragraph 181 of the NPPF.
- 6.49 The FRA confirms that the entire Site is located in Flood Zone 1 (low risk) where all types of development are considered acceptable in line with the Sequential Test guidance within the NPPF and PPG. In terms of surface water flooding, there are isolated small low areas on the Site affected during the high-risk scenario, there is an area of medium risk along Camer Road towards Sole Street at the east boundary, and an area of low risk crossing the north-east corner of the Site toward the railway cutting. All built development within the site boundary, including the access, is proposed to be located outside of existing surface water risk pathways.
- 6.50 Based on the assessment of existing flood risk at the Site, the only source of flood risk which requires mitigation is that from surface water. The proposed surface water strategy manages runoff by means of infiltration features set within the Chalk strata beneath the Site, for which in situ testing has demonstrated suitable rates. It includes attenuation basins, which are sized to provide attenuation for all events up to and including the 1 in 100 year plus 45% climate change storm event. The proposed SuDS components will also capture pollutants to protect water quality. Alongside the incorporation of

SuDS, building floor levels will be set at least 150mm above surrounding ground levels to prevent water ingress during extreme rainfall. This approach was agreed via pre-application consultation with the LLFA.

- 6.51 The updated PPG (2025) makes clear that the sequential test does not need to be applied where surface water flood risk is safely mitigated. The measures outlined above will adequately protect the proposed built development from existing surface water flood risk. Hence, the sequential test does not need to be applied in this case.
- 6.52 It is proposed that the foul water flows will connect via pumped rising main to Southern Water's existing foul sewer network in Norwood Lane to the south. The locations of the proposed on-site pumping station and point of connection in Norwood Lane is in the southwestern corner of the Site, as shown on the Drainage Strategy.
- 6.53 Overall, the proposals are consistent with the aims of the NPPF and PPG and all relevant local guidance. The Assessment confirms that the development would be safe for its lifetime and would not increase the risk of flooding on site or elsewhere.

Ecology and Biodiversity

- 6.54 In accordance with Paragraph 187(d) of the NPPF and Policy CS12 of the Local Plan, the Applicant commissioned Greenspace Ecology to carry out an Ecological Appraisal comprising a UK Habitats survey and further Phase 2 protected species surveys in relation to badger, bats, birds, dormice, great crested newts and reptiles.
- 6.55 Policy CS12 states that there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the new development. The Site comprises cropland with arable field margins, parcels of grassland, woodland, scrub and tall forbs, hedgerows and scattered trees. All high value and priority habitats, such as hedgerow and woodland, will be retained and enhanced where possible, with extensive additional hedgerow, tree and scrub planting proposed. The Green Infrastructure Strategy demonstrates the proposed green spaces and the opportunities they offer to support biodiversity and provide connectivity between the Site and the wider landscape, such as the proposed woodland belt connecting the existing parcels of woodland on Site. Furthermore, a range of mitigation measures are proposed to reduce disturbance of the on-site habitats as well as mortality and disturbance of protected species, including a dedicated skylark habitat area, 30m buffer zone around identified badger setts, the provision of bird and bat boxes, and a sensitive lighting scheme.
- 6.56 The Site lies in the potential Zone of Influence of four internationally designated sites, four nationally designated sites and nine non-statutory designated sites. The proposals include a range of measures

to reduce potential recreational pressures on these sites, including significant areas of green space with extensive recreational walking routes, alongside designated dog parks, signage, and provision of bins to encourage activities such as dog-walking to take place within the Site, and reduce the likelihood of people travelling to the nearby designated sites.

- 6.57 Overall, the EIA concludes that all residual effects during both the construction and operational phase of the development are not significant, and an extensive scheme of habitat enhancement is proposed on site, in accordance with local and national policy.

Biodiversity Net Gain

- 6.58 The Environment Act requires development to secure at least a 10% Biodiversity Net Gain (BNG) against the DEFRA metric. BNG has been sought on Site through the enhancement of existing habitats, native tree and hedgerow planting, and optimising areas of green, open space.
- 6.59 Overall, significant on-site BNG can be achieved as part of the development, as set out in the Biodiversity Gain Plan prepared by Greenspace Ecology. This includes a 29.05% increase in area habitat units, and a 10.62% increase in hedgerow units. There are no watercourses on Site, so this metric is not relevant.

Arboriculture

- 6.60 The proposed development will retain the vast majority of trees on site, including all trees of value and areas of woodland. The Arboricultural Impact Assessment demonstrates that the only trees proposed to be removed are two individual Category B trees and three Category C tree groups to facilitate the proposed access. The proposals will not result in the loss or deterioration of any ancient woodland or any ancient or veteran trees, complying with paragraph 193 (c) of the NPPF.
- 6.61 Extensive tree planting is proposed across the Site to mitigate against any losses, including a proposed woodland belt linking together the two existing areas of woodland, and a significant number of native tree species across the Site.
- 6.62 It is therefore considered that the Site's arboricultural attractiveness, history, landscape character and setting will be maintained.
- 6.63 The scheme will accommodate root protection areas as part of the proposals, as demonstrated on the Arboricultural Impact Assessment. A Tree Protection Plan will also be produced at Reserved Matters stage to ensure the proposed development will result in no significant or long-term damage to the root systems or environments of the retained trees.

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- 6.64 Overall, whilst the proposal will result in a minor loss of trees and hedgerow, this has been minimised, and an extensive scheme of tree planting is proposed to compensate for these losses. Therefore, the proposals would comply with relevant local and national policies.

Heritage and Archaeology

Built Heritage

- 6.65 In line with Paragraph 207 of the NPPF, the likely significant effect of the proposed development on built heritage assets has been assessed as part of this application.
- 6.66 Policy CS20 states that when considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. There are heritage assets in proximity to the Site including Norwood Farmhouse (Grade II) and the Bailiff's House (Grade II).
- 6.67 Most of the heritage sites are too far away or screened by trees and other buildings to experience any real change. Furthermore, the historic relationship between the Site and nearby assets, including Norwood Farmhouse, is minimal. The Proposed Development incorporates embedded landscape mitigation which will provide effective visual buffering and ensure that any effects are reduced to a negligible level and potentially eliminated at detailed design stage.
- 6.68 Overall, the proposed development has been assessed as having no impact (causing no harm) to the significance of any relevant built heritage asset and would therefore wholly accord with relevant local and national policies.

Archaeology

- 6.69 An Archaeological Desk Based Assessment (DBA) was prepared by Iceni Projects to assess potential presence and significance of archaeological assets on the site. This concluded a Low Potential for the prehistoric to medieval periods of Local Significance, and a Moderate Potential for post-medieval remains of Local Significance. Following this, a geophysical survey was undertaken, as per advice received from KCC Heritage.
- 6.70 As the results of the geophysical survey were inconclusive due to site conditions, a trial trench evaluation may also be required, and/or clear options for post-determination flexibility in layout/design for preservation in situ. It is considered that these works could be secured via condition, to ensure that all archaeological site-based work would be undertaken prior to the commencement of below-ground works associated with the Proposed Development.

Sustainability and Energy

- 6.71 To demonstrate the scheme's commitment to sustainable development, a Sustainability and Energy Statement has been prepared by Icen Projects. This document has informed the design process by identifying both opportunities and constraints for incorporating sustainable principles. It is important to note that the development proposals are outline, and further detail will come forward at Reserved Matters stage.
- 6.72 Policy CS18 states that the Council will seek to reduce the overall carbon footprint of the Borough. By designing to rigorous energy standards, employing electric-only systems, and integrating renewable energy technologies, the application will respond directly to the Climate Emergency declared by Gravesham Borough Council in June 2019. These measures combine to provide a significant carbon dioxide emissions savings compared to the Part L:2021 baseline, aiming to significantly exceed the requirements of Gravesham Borough Council.

Noise and Air Quality

- 6.73 Paragraph 174 of the NPPF states that the planning system should contribute to and enhance the natural and local environment, by preventing new or existing development from contributing to or being put at unacceptable risk from air pollution or noise.

Noise

- 6.74 A Noise Assessment was prepared by Entran to assess the baseline noise levels at the Site, and the potential impact of the development during the construction and operational phase.
- 6.75 The appraisal of noise and vibration levels associated with the construction phases of the Proposed Development shows that there is low likelihood of noise impacts during the majority of construction activities. Measures to control construction will be incorporated within the Construction Environmental Management Plan (CEMP) and/or detailed in construction method statements.
- 6.76 The noise survey indicated that the primary noise source is local road traffic from Camer Road. It is recommended that proposed buildings should be sited to screen gardens from the adjacent road and gardens should not overlook the road, as far as practicable. This can be considered further at detailed design stage. Overall, with appropriate mitigation measures, the resultant noise effect will be Negligible at proposed residential properties.
- 6.77 Furthermore, the impact of development associated traffic has been assessed, and changes in road traffic noise are not calculated to give rise to significant adverse effects in the long-term.

Air Quality

- 6.78 An Air Quality Assessment was undertaken by Entran to accompany the application which assessed baseline conditions on Site, identified any nearby sensitive receptors, and assessed the potential impacts of the development during operational and construction phase.
- 6.79 During construction, through good site practice and the implementation of suitable mitigation measures, the resultant impacts of dust and PM₁₀ releases are considered to be negligible.
- 6.80 With regards to operational effects, it was identified that the traffic generated by the Proposed Development is considered to have a Negligible impact on local air quality, and future occupants of the Proposed Development would not be exposed to pollutant concentrations above the relevant objective levels, in accordance with relevant policy.

Ground Contamination and Pollution

- 6.81 Paragraph 196 requires taking account of ground conditions and risks arising from land instability and contamination to ensure a site's suitability for its proposed use. Policy CS19 states that new development will be located, designed and constructed to avoid adverse environmental impacts from pollution, including land contamination.
- 6.82 As such, a Phase I Land Contamination Assessment was prepared by Leap Environmental to assess the site's history, potential contamination sources, pathways and receptors. The Assessment confirms that the Site has historically been agricultural in use.
- 6.83 It is considered likely that some localised Made Ground in the southeast of the Site, and a number of potential sources of soil contamination, and gas risks have been identified on site. Therefore, it is recommended that intrusive works are undertaken to confirm the actual ground conditions on Site. These measures can be secured through appropriate planning conditions.

Health Impact Assessment and Education Assessment

- 6.84 Section 8 of the NPPF states that planning decisions should aim to achieve healthy, inclusive and safe places, to enable and support healthy lives, promote good health, prevent ill-health and reduce health inequalities. The HIA considers key factors affecting health and sets out actions and measures to reduce any negative effects and promote positive outcomes where appropriate.
- 6.85 The HIA demonstrates that there will be no adverse health impacts arising from the proposals following mitigation, and in fact there will be numerous positive health benefits arising from the scheme.

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- 6.86 The addition of 725 residential units will help to address the housing need in Gravesham and relieve pressure on the general housing stock, which will help to reduce the barriers of access to housing that currently exist in the area.
- 6.87 The provision of new areas of open space and high-quality landscaped areas will have various positive health effects for residents and visitors, including improved mental health, reduced rates of obesity, and stimulating social cohesion. Furthermore, employment and income are a key determinant of health and wellbeing. The provision of a new local centre and two form-entry primary school will support demand for primary schools in the local area and provide employment opportunities.
- 6.88 The HIA also ensures that the scheme will not impact negatively the local population during its construction. The scheme will generate new employment opportunities which can be filled by the local population. To ensure that the construction jobs utilise the local labour force and directly support those previously unemployed or on low incomes locally, it is recommended a procurement plan should be arranged. In terms of environmental impact, a construction management plan will be adhered to, to mitigate measures and set parameters for the work needed at the construction stage.
- 6.89 Overall, the HIA demonstrate that the scheme will provide the homes, jobs and services that people need, reducing environmental risks and delivering well-designed buildings and open spaces which will create the conditions for healthy, active lifestyles.
- 6.90 An Education Needs Assessment has also been provided to understand the current and projected school capacity in the area. This demonstrates that primary schools within the Proposed Development Planning Area are currently operating at 95.1% capacity, resulting in limited flexibility to manage parental choice or absorb fluctuations in cohort size. Furthermore, the primary school closest to the Site, Meopham Community Academy, is currently operating 25 pupils above capacity. This is the only primary school within walking distance of the Site. There is also no primary school in Sole Street, meaning parents likely need to drive their children to school at present.
- 6.91 There are currently four outline planning applications for residential development in the area, which could further impact upon education capacity locally. When multiple housing developments come forward within the same planning area, their combined impact on education provision is significantly greater than the impact of any single scheme alone. It is important to note that none of these proposed schemes below can deliver a primary school, and as identified above, there is not sufficient primary school capacity in Meopham to accommodate these additional pupils.
- 6.92 The addition of a 2FE primary school on this Site could accommodate up to 420 pupils. This would provide existing residents of both Hook Green/ Meopham and Sole Street with the opportunity to walk to school via safe and attractive active travel routes, promoting health and wellbeing. It would also

provide enough capacity for primary aged pupils from the Proposed Development, as well as supporting a potential increase in demand in the wider area.

7. PLANNING BALANCE

- 7.1 As set out in Section 5.0 of this Statement, the proposed development should be assessed in the context of NPPF paragraph 11 (d). This requires that for decision taking, where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission be granted unless:

- i. *the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or*
- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

Paragraph 11d)i Protected Areas or Assets of Particular Importance

- 7.2 Footnote 7 of the Framework clarifies that policies or assets of particular importance are those referenced in the Framework (rather than those in Development Plans). Table 7.1 lists these and our assessment as to whether they are engaged or not by the application proposal:

Table 7.1: List of policies or assets of particular importance engaged by the application proposals

Asset of importance	Engaged?	Comments
Habitat Sites (Special Protection Areas and possible Special Areas of Conservation, Ramsar sites and sites required for mitigation in respect of these assets)	No	NA
Sites of Special Scientific Interest (SSSI)	No	NA
Green Belt	Yes	Site is located in the Green Belt so assessment required as to whether Green Belt presents a strong reason for refusal.
Local Green Space	No	NA
A National Landscape, National Park or Heritage Coast	Yes	Site lies adjacent to the KDNL so further assessment

		is required to determine whether it presents a strong reason for refusal.
Irreplaceable habitats	No	NA
Designated Heritage Assets	Yes	There are designated heritage assets in proximity to the Site. An assessment is required to determine if this presents a strong reason for refusal.
Areas at risk of flooding or coastal change	Yes	Site lies entirely in flood zone 1, though minor surface water flooding areas in parts of the site.

- 7.4 The footnote 7 designations that could have been engaged by the proposal relate to the Grade II Listed Heritage Assets, the Kent Downs National Landscape, the areas of Surface Water Flood Risk, and the Green Belt. Accordingly, assessment is required to determine whether any of these constraints present a strong reason for refusal of planning permission or not. If they do not present a strong reason for refusal, Paragraph 11di) is satisfied, and an assessment should be made under paragraph 11dii).

Inappropriate and Not Inappropriate Development in the Green Belt

- 7.5 In assessing whether the Green Belt presents a strong reason for refusal, a decision taker is required to determine whether the application amounts to inappropriate development in the Green Belt (and assessed under paragraph 153 of the Framework) or qualifying grey belt development (under Paragraphs 155 and 156 of the Framework). Under either route, a decision taker can conclude that the Green Belt does not provide a strong reason for refusal, however the two assessments are materially different.
- 7.6 Grey belt policy provides a more explicit and objective assessment and if the application is deemed not inappropriate, qualifying grey belt development, it is evident that the Green Belt does not provide a strong reason for refusal. Under this decision taking route, harm to the Green Belt should not be afforded substantial negative weight, as clarified by Footnote 55 of the Framework.
- 7.7 Conversely, inappropriate development in the Green Belt engages policy outlined in paragraph 153 of the Framework, which applies a weighted planning balance against development. In this regard Paragraph 153 of the Framework requires a decision taker to assess the harm to the Green Belt caused by the application and necessitates that “substantial” weight be given to any harm to the Green Belt in the planning balance, including harm to the openness of the Green Belt. The policy goes on to

highlight that inappropriate development is, by definition, harmful to the Green Belt and should only be approved except in very special circumstances, whereby the Green Belt harm and any other harm resulting from the proposal is clearly outweighed by other considerations.

- 7.8 In considering part (i), the proposed development falls under the exceptions test at Paragraph 155 of the Framework, and therefore the site constitutes Grey Belt land and Green Belt is not relevant in this case.

National Landscapes, Designated Heritage Assets and Flooding

Impacts on the Kent Downs National Landscape, nearby designated heritage assets, and areas at risk from flooding have been assessed in Section 6.0 above, and it is considered that no strong reason exists to refuse or restrict the development under relevant Framework policies or under Footnote 7. Paragraph 11dii) and the application of a tilted balance

- 7.9 It is evident from the policy outlined at Paragraph 11dii) of the Framework that a planning balance should be undertaken, consistent with determining any planning application under the Town & Country Planning Act 1990 (as amended), but with a clear direction that planning permission should only be refused if any adverse impacts would significantly and demonstrably outweigh the benefits.
- 7.10 This weighted planning balance requires a decision taker to give particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes. These policies, which are all engaged by the application proposal are through their explicit reference in Paragraph 11dii), to be a particular focus for decision taking and weighting ahead of other policies, albeit it is recognised that an adverse impact on any issue/s could present a reason for refusal, provided it/they were to so demonstrably outweigh the weighted benefits that they justified refusing planning permission.
- 7.11 In accordance with part (ii), it therefore follows that planning permission should be granted unless any adverse impacts of doing so would **significantly** and **demonstrably** outweigh the benefits.

Adverse Impacts / Harms

- 7.12 The following adverse impacts/ harms have been identified through the undertaking of detailed technical work, and include the following:
- Agricultural Land: The proposed development will result in the loss of 42.1 ha of BMV agricultural land. In accordance with National Policy, an assessment of the economic impact has been undertaken. This concludes that the economic benefits of a land parcel of this size are limited, and the food production benefits, when viewed in the context of the food production of the UK, are minimal. Therefore, the loss of this land should only be afforded limited weight.
 - Landscape impact: The open nature of the landscape will be replaced by predominantly built form in the western part of the Site, tying into the existing settlement of Hook Green, while the

eastern part of the Site will remain much more open. This will result in a moderate adverse effect on the cropland given its loss. By year 15, the proposed vegetation will be established and the development will integrate into the surrounding landscape, with the development providing significant long-term beneficial effects on the grassland and public footpath network.

- National Landscape: Whilst the assessment identifies that there will be a negligible adverse impact to the setting of the KDNL during the construction phase, due to the presence of and movement of plant and machinery in the setting of the KDNL. Once the development is completed, the extensive landscaping strategy is considered to represent an improvement to the setting of the National Landscape. Overall, the integrity of the National Landscape will largely remain unaltered, and where the Proposed Development is perceived, it will represent a subtle betterment due to its transitional parkland setting. Therefore, the proposed development is not just conserving the setting KDNL but enhancing the landscape and scenic beauty of this nationally designated landscape.

- 7.13 Given the scale of shortfall in housing delivery and land supply in Gravesham, significant development at the edge of settlements is likely to be required to meet the Borough's housing, economic and infrastructure needs. In this regard, the harms identified above are given reduced weight in the balancing exercise.

Benefits

- 7.14 NPPF paragraph 8 identifies three dimensions to sustainable development, comprising economic, social and environmental roles. The following sub-section provides an assessment of the Site and proposed development against these criteria, demonstrating how the scheme will bring a range of economic, social and environmental benefits to the local area and the Borough.
- 7.15 Notwithstanding this comprehensive suite of benefits, it is also important to note that the Site is considered to be grey belt and would therefore be sequentially preferable for residential development over higher performing Green Belt land. A large proportion of the Borough is constrained when it comes to development, covered by either Green Belt designation, National Landscape designation, or land safeguarded for the Lower Thames Crossing. There is a limited availability of suitable brownfield sites to meet the development needs of the Borough, particularly within sustainable locations close to transport links and key facilities/ services.
- 7.16 Therefore, to meet the increasing housing needs and ensure residents are able to afford to stay within the local area, Green Belt release will be required. Alongside the fact the Site comprises grey belt land and therefore is not considered to be a highly performing Green Belt parcel, the Site is also adjacent to the one of the most sustainable settlements in the Borough, with two train stations within walking distance, making this a highly logical location for new residential development. It was also identified in the emerging Local Plan as a potential housing allocation, demonstrating its suitability.
- 7.17 The development also meets the Golden Rules as set out in Paragraph 156, which would be given significant weight in favour of granting planning permission.

Economic

7.18 The proposed development would provide a substantial contribution to the local economy through the construction and occupation of up to 725 new homes. As well as generating a number of benefits through investment at the construction stage, once complete, the development will create further economic benefits through the provision of a new workforce with expenditures within the services and facilities of in Meopham, Gravesham and Kent.

7.19 More specifically, the following economic benefits have been identified:

- Supporting direct and indirect job creation during the construction phase. During the 6-year construction phase, around 3,304 construction jobs would be created. This will include measures such as providing additional training, skill development and work placements for young people in disciplines such as construction and making provision for larger contractors to take on local apprentices as part of their contract.
- The Proposed Development is estimated to generate 80 jobs once complete, including those that are direct on site (such as managing the open space and within the local centre), and indirect jobs through the supply chain
- Up to 1,784 new residents will support local shops, services, and businesses, stimulating the local economy long-term. It is estimated that the additional residential expenditure in the local area will be £20.9 million each year which would support the vitality and viability of local centres, businesses and services. In addition, an estimated £1.2 million will be spent by new residents on furniture, appliances and moving costs, a portion of which will be spend in local shops and businesses.
- The inclusion of a two-form entry primary school will generate new teaching and operational jobs, as well as sustain existing early-years and secondary school demand.
- Infrastructure investment - the scheme includes upgrades to Norwood Lane and public transport improvements, which enhance connectivity and local accessibility.
- Generation of direct and indirect GVA over the build period.
- New Homes Bonus payments and Council Tax payments (payable in perpetuity).
- Significant investment from the private sector to support local businesses.

Social

7.20 The proposed development has been designed carefully to ensure a range of homes are provided to meet local needs, accessibly located within walking distance of services and facilities, alongside a variety of public open spaces and community facilities for existing and future residents, improvements to pedestrian and cycling infrastructure, and a new primary school.

7.21 Specifically, the following social benefits have been identified

- The provision of up to 725 new homes will make a significant contribution towards the needs of GBC in a time when there is a clear acute housing need in the Borough. Should the scheme deliver approximately 100 homes per year (beginning in 2027) this would equate to around 15% of the latest annual housing requirement. This level of delivery would materially assist the Council in meeting its objectively assessed housing need, reducing the risk of persistent under-delivery and helping to restore a robust five-year supply.
- The proposal would also include the provision of up to 363 affordable new homes to meet affordable housing needs in the Borough. This will make a significant contribution in a time when affordability is having a considerable impact on households.
- A suitable housing mix has the potential to meet the housing needs of a spectrum of people in different stages of life, such as families, working couples, students and individuals, and should allow people to access the housing market locally. This will aid in the creation of mixed and balanced communities.
- A new primary school will ensure that school capacity matches local demand, which KCC have identified as being needed in the Rural South, reducing travel distances for families and encouraging walking/ cycling.
- Approximately 23 ha of public open space is proposed. This includes sports pitches, play areas, allotments, a dog park, outdoor gym, and civic and sports hub. This will provide opportunities for social interaction, to help support the health and well-being of residents and the wider public and ensure children and young people can access a range of areas for play within safe walking distance.
- The masterplan integrates active travel routes, bus stops and a new bus loop, and safe pedestrian/cyclist links, enabling sustainable mobility and social inclusion. The inclusion of a local centre and civic space also creates a new focal point to encourage social interaction and active lifestyles.
- A high-quality scheme delivered in line with the Gravesham Design Guide including housing that meets space standards, giving residents the space they need and enjoyment in their own homes. At detailed design stage, the proposal will be designed to give increased opportunity for natural surveillance, community interaction and environmental control, with dwelling frontages facing onto the street scene. Further measures to improve the safety of the Site include a lighting strategy that will aid navigation and movement around the site.

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- Suitable community infrastructure contributions to address any further identified needs within the Borough, such as healthcare and secondary education provision.

Environmental

7.22 The application is supported by a number of technical reports which detail and assess the proposed development in order to demonstrate environmental benefits. Furthermore, the proposal ensures the efficient use of land, through the development of a well-contained Green Belt site adjacent to existing settlements, helping to deliver much-needed housing without dispersing growth into more sensitive areas.

- The scheme will deliver Biodiversity Net Gain in excess of 10% (c. 29%) through the provision of on-site habitat retention and enhancement, such as tree planting, landscaping and new green corridors. More than half of the Site is reserved for public open space.
- Conservation and enhancement of the Kent Downs setting, through a landscape-led masterplan. Green buffers, tree planting, and open space are concentrated along the eastern and southeastern boundaries to maintain a soft, transitional edge to the countryside and protect the tranquillity, visual character, and setting of the National Landscape.
- The scheme includes allotments and community growing areas, which promote local food resilience and continued productive use of soils.
- Provision of a cohesive green infrastructure strategy that includes a significant quantum of green, open space and SuDS ponds connected through green corridors to ensure habitat connectivity. This will include pedestrian and cycle paths, meeting points and recreational areas providing the opportunities for residents to travel and interact in a safe and sustainable way.
- The proposed development includes the retention, protection and enhancement of the highest quality trees, including the areas of woodland within the centre of the Site, making these into a key feature. Mature hedgerow and planting will also be safeguarded where possible to contain the visual impact of the site as well as keeping native species and biodiversity on Site. New tree planting and areas of semi-natural green space/ native landscaping are also proposed, and overall, it is expected that there will be a general improvement in the quality of landscaping as a result.
- A dedicated skylark habitat is provided which will be fenced off from the public to ensure the habitat is enhanced.
- The development of active travel corridors for walking and cycling, alongside the provision of secure cycle spaces, to provide residents with the opportunity to utilise active travel methods. The provision of infrastructure within the Site, including new primary school and Local Centre,

alongside recreation opportunities, mean new residents can access a range of facilities without the need to travel. This will also benefit the existing residents of Meopham and Sole Street.

- Enhancement of sustainable public transport options, through the creation of a bus loop within the development, alongside a commitment to enhancing local bus services
- The provision of electric vehicle charging points for each property to ensure this is an available option for future occupiers.
- A comprehensive Sustainable Drainage System (SuDS) will also be implemented and support environmental enhancements in relation to flood risk, water quality and biodiversity.
- Whilst there is currently no housebuilder on board to deliver the development, the McManus family are committed to ensuring a scheme of the highest quality is built, including building in line with Future Homes Standards.

Summary

- 7.23 The proposed development has been assessed in the context of paragraph 11(d)(ii) to determine if any adverse impacts of permitting the development would significantly and demonstrably outweigh the benefits.
- 7.24 In this context, the benefits as outlined at Paragraphs 7.14 – 7.22 of this Planning Statement should be acknowledged including (but not limited to) the provision of housing (including affordable housing), a new 2-form intake primary school and sports facilities, transport and connectivity improvements, the delivery of considerable open space, and a range of economic benefits. When weighed against the severe and ongoing housing shortfall, the critical affordability pressures, and the lack of alternative deliverable sites, these benefits are considered to be substantial and far-reaching. They deliver precisely the outcomes that the NPPF (2024) seeks to promote, including a significant boost to the supply of homes, social and economic growth in sustainable locations, and environmental protection through high-quality, landscape-led design.
- 7.25 None of the (limited and mitigated) harms identified would significantly and demonstrably outweigh the considerable and extensive benefits of the scheme. It therefore follows that the application should be approved.

Assessment against the Development Plan

- 7.26 It is acknowledged that the Site is located on greenfield land outside of the settlement boundary of Meopham (and Sole Street) and is not allocated within the adopted Development Plan, and therefore, residential development in this location is not supported under Core Strategy Policy CS02. However,

this policy is not consistent with the aims and policies within the Framework and this conflict should therefore be given limited weight.

7.27 The Site accords with the criteria of NPPF paragraph 155 and therefore the proposal does not amount to inappropriate development within the Green Belt. There are no other footnote 7 constraints of relevance. As the proposal is not considered to be “inappropriate development” in the Green Belt, any harm to the Green Belt should not be considered in the planning balance, and the policies relating to the Green Belt in the development plan are therefore given no weight in the decision taking for these proposals.

7.28 There are no other demonstrable policy conflicts arising from the scheme.

Very Special Circumstances

7.29 Although currently designated as Green Belt, the Site is considered to meet the definition of grey belt and therefore it is not necessary to carry out the balancing exercise set out in NPPF Paragraph 153 to demonstrate that very special circumstances exist. Nevertheless, it is our position that benefits resulting from the proposal clearly outweigh the collective harms.

7.30 In accordance with NPPF paragraph 153, if the Site was not considered to be grey belt, **substantial** weight would need to be applied to any harm to the Green Belt. As set out in the submitted Green Belt Assessment, the proposed development will impact the openness of the Green Belt to some extent, with the level of harm assessed to be moderate. This harm must be viewed in the context of the site and its surroundings. The Site is already well-contained by strong, defensible boundaries, which will be enhanced through the proposed development, meaning that any visual impact will be limited to the immediate surroundings. Importantly, the wider Green Belt will remain unaffected.

7.31 It is considered that the benefits of the scheme outlined above, including the delivery of market and affordable housing in the context of substantial, demonstrable unmet needs, alongside the delivery of a school and other essential infrastructure, would clearly outweigh the harms. The proposed development also meets the Golden Rules as demonstrated in Section 5.0 of this Planning Statement, and therefore significant weight should be applied in favour of granting planning permission in this context, in accordance with Paragraph 158 of the NPPF.

7.32 Therefore, even if the Council were minded to conclude that the Site is not grey belt, a comprehensive suite of benefits amounting to Very Special Circumstances would exist that ensure that the development should be permitted.

8. CONCLUSIONS

- 8.1 This Planning Statement has been prepared in support of an Outline Planning Application to Gravesham Borough Council for Land North of Camer Road, Meopham. The proposed development comprises:

Outline planning application for up to 725 dwellings (Use Class C3), a new two-form entry primary school (Use Class F1), a Local Centre (up to 500sqm of Class E floorspace), the provision of Public Open Space including sport and recreation facilities alongside associated access, landscaping, parking, and infrastructure; with all matters reserved except for access.

- 8.2 Gravesham is one of the most physically constrained local authorities in Kent, with over 75% of the Borough as Green Belt, a large portion of the south-eastern and central areas of the Borough located within Kent Downs National Landscape, extensive areas in the north of the Borough safeguarded for major infrastructure (Lower Thames Crossing), alongside large areas near the Thames estuary being constrained by flood risk (Flood Zones 2–3).
- 8.3 This severely limits options for sustainable housing development on non-designated land. However, Gravesham faces acute and persistent housing delivery challenges with significant unmet housing needs. The latest published five-year housing land supply position was only 3.0 years, and the most recent Housing Delivery Test fell below 75%, at only 59%. Therefore, it is imperative that suitable and sustainable housing sites come forward without delay
- 8.4 Whilst the Site does fall within the Green Belt, it has been demonstrated to comprise grey belt land and fully complies with the requirements of paragraphs 155-157 of the NPPF to demonstrate that the Site's development would **not** constitute inappropriate development within the Green Belt.
- 8.5 Furthermore, Meopham is identified in the Gravesham Core Strategy as a Tier 2 Rural Service Centre, a location already providing a range of services and shops, alongside a railway station with regular connections into London, Medway and surrounding towns. The Site is within walking distance of these facilities, alongside Sole Street railway station, giving future residents a genuine opportunity to utilise sustainable and active travel modes. Due to the strategic scale of the Site, it is able to deliver a number of unique benefits, including a 2FE primary school and over 22ha of accessible open space and sport/recreation facilities, within a highly sustainable, edge of settlement location.
- 8.6 Overall, in accordance with Paragraph 11d)ii of the Framework, this Planning Statement has demonstrated that any harms resulting from the proposal would **not** significantly and demonstrably outweigh the comprehensive suite of benefits.

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- 8.7 Furthermore, there is a significant push from Government to boost the supply of housing, with a target of 1.5 million homes to be delivered this term. Well-designed, sustainably located proposals which seek to support this should therefore be approved without delay. The principle of development accords with relevant national and local policy. Even if the Council is minded to disagree with the view that the Site is grey belt, a clear case has also been outlined to support the proposals under a VSC case. As such, it is clear that these proposals bring significant economic, social and environmental benefits to the local area and the wider region. It therefore follows that the application should be approved.
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