

Addendum Planning Statement

Land south of Longfield Road, Meopham

September 2026

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Client

Richborough

Our reference

PP0022

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1. Introduction

1.1 This Addendum Statement has been prepared by Pinnacle Planning on behalf of our client Richborough (hereafter referred to as Richborough or “the Applicant”) in support of an outline planning application for the development of land to the south of Hook Green, on land to the south of Longfield Road (“the Site”).

1.2 The application (Reference: 20250993) was submitted in October 2025 and was made in outline with all matters reserved except for the means of access.

1.3 The description of development is as follows:

“Outline application for the erection of up to 120 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Longfield Road and all other matters are reserved.”

1.4 This Addendum should be read in conjunction with the original Planning Statement that was submitted with the application. This Addendum has been prepared to identify and address the Policies of the 2026 version of the NPPF, focusing on those which are relevant to the principle of development.

2. Updated National Planning Policy

National Planning Policy Framework (NPPF)

- 2.1 The Revised NPPF was published in August 2026 and sets out the Government's planning policies for England and how they are expected to be applied in decision-making and plan making. Paragraph 1 of the document highlights that the NPPF is a material consideration of critical importance for both plan-making and making decisions on development proposals.
- 2.2 Those elements of the NPPF identified as most relevant to this application are discussed in more detail below.

Achieving Sustainable Development

- 2.3 Policy S3 is clear that decisions on development proposals should apply a presumption in favour of sustainable development.
- 2.4 Policy S5 states that development should be approved outside settlements, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework.
- 2.5 Local Planning Authorities (LPAs) are also encouraged to approach decisions on proposed developments in a positive manner and should apply a presumption in favour of sustainable development and approve development proposals that accord with an up-to-date development plan without delay¹.

Delivering a sufficient supply of homes

- 2.6 The introductory text to Chapter 6 is clear that the objective of the policies is to support the delivery of a substantial increase in the supply of homes, by ensuring that a sufficient amount and variety of land can come forward where needed. This includes planning for an appropriate mix of accommodation for the local community and ensuring that land with permission is developed without unnecessary delay.
- 2.7 Policy HO3 provides policy direction in regard to maintaining the supply and delivery of housing. In particular, the Framework requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old, with an appropriate buffer.
- 2.8 Policy HO7 is clear that substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community.
- 2.9 Policy HO8 relates to affordable housing, noting that where development proposals meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures, including the minimum proportion of Social Rent properties,

¹ Policy S3(1)(c)

a flexible approach should be taken to the application of any development plan requirements relating to the number of bedrooms provided in market homes.

Making effective use of land

- 2.10 The introductory text to Chapter 12 is clear that the objective of the policies is to promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 2.11 Policy L3 states that development proposals should make efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places.

Promoting healthy communities

- 2.12 Policy HC1 of the Framework promotes the creation of healthy and inclusive community facilities and public service infrastructure.
- 2.13 Policy HC3 of the Framework notes that proposals for housing should be informed by an understanding of the need for any associated improvements to community facilities and public service infrastructure, whether on or off-site.
- 2.14 Policy HC4 states that substantial weight should be given to the benefits where new or improved public service infrastructure or community facilities would be provided.

Protecting Green Belt land

- 2.15 Policy GB2 establishes the five purposes of the Green Belt:
- a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns; and*
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*
- 2.16 The definition of grey belt land is provided in the NPPF at Annexe 2 and states:
- "For the purposes of plan-making and decision-making, '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 policy GB2."*
- 2.17 Policy GB7 identifies categories of development which are not inappropriate in the Green Belt, including (g), where all of the following apply:

- i. 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;*
- ii. There is an evidenced unmet need for the type of development proposed;*
- iii. The development would be in a sustainable location, with particular reference to policy TR3 of this Framework; and*
- iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8.*

2.18 Policy GB8 establishes the Golden Rules for sites in the Green Belt subject to a planning application, and requires the following contributions to be made:

- a. Affordable housing which reflects a contribution which is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of a 50%;
- b. Necessary improvements to local or national infrastructure; and
- c. The provision of new green space, or improvements to existing green space, which is accessible to the public. New residents should be able to access good quality green spaces within a short walk of their homes, whether through on-site provision or through access to offsite spaces.

2.19 Policy GB8(2) is clear that substantial weight should be given to the importance of complying with the Golden Rules.

Achieving Well-Designed Places

2.20 Policy DP3 requires development proposals to deliver high-quality design that responds positively to the site's context and enhances its surroundings. Development should reflect local character, landscape, townscape and heritage assets while creating attractive, sustainable and functional places.

2.21 Policy DP4 emphasises that design quality must be embedded throughout the planning, assessment and delivery of development proposals. Applicants are expected to demonstrate a robust design process from the earliest stages, including engagement through pre-application discussions where appropriate

Efficient Use of Land

2.22 Policy L3 encourages the efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places.

Other relevant chapters

2.23 Other chapters of the Framework seek to ensure that development:

- Promotes sustainable transport;
- Meets the challenge of climate change;
- Manages flood risk and coastal changes;
- Conserves and enhances the historic environment; and
- Facilitates the sustainable use of materials.

3. Planning Assessment

- 3.1 The original Planning Statement that was submitted with the application identified that Policy CS02 of the adopted Core Strategy is clear that development outside settlements inset from the Green Belt will be supported where it is compatible with national policies for protecting the Green Belt.
- 3.2 The 2026 NPPF has updated national policy in respect of Green Belt, particularly in regard to development which is to be considered to be “not inappropriate” within the Green Belt. This Addendum has therefore sought to identify these policies and undertake an assessment of the proposals against them.

Not Inappropriate Development

Policy GB7(1)(g) - Grey Belt

- 3.3 The 2026 NPPF includes the concept of grey belt and Policy GB7(1)(g) establishes a series of criteria which should all apply if the development of homes in the Green Belt is not to be regarded as inappropriate.
- i. 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;*
 - ii. There is an evidenced unmet need for the type of development proposed;*
 - iii. The development would be in a sustainable location, with particular reference to policy TR3 of this Framework; and*
 - iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8.*

- 3.4 Each of these criteria is considered under the following headings.

Policy GB7(1)(g)(i)

- 3.5 Annexe B of the NPPF defines grey belt as follows:

“For the purposes of plan-making and decision-making, ‘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 policy GB2.”

- 3.6 The Site was assessed as part of the Stage 2 Green Belt Study (2020), forming part of parcel HG7. It was found to make a limited or no contribution to purpose A, B and D.
- 3.7 The PPG was updated in February 2025 in respect of Green Belt, with the changes focussing on assessing Green Belt and identifying grey belt land. These changes are now reflected in the NPPF at Annex E.

- 3.8 Annex E confirms that in regard to Green Belt Purpose A, this relates to the sprawl of large built-up areas, and that villages should not be considered large built-up areas.
- 3.9 Hook Green Meopham is identified as a second-tier settlement established as part of Policy CS02. Given the scale of the settlement, Hook Green is clearly a village and not a large built up area, meaning that the Site cannot contribute strongly to Purpose A. The Committee Report for an application at Norwood Lane, Meopham² confirms that GBC agrees with this assumption, noting at Paragraph 6.40 that *“as Hook Green, Meopham is considered to be a village (as set out earlier), the site does not contribute to the unrestricted sprawl of large built-up areas”*.
- 3.10 Even if this were not the case, Annex E is clear that for an assessment area to make a strong contribution, it should be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development; and, if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt). It is evident that the development would not result in an incongruous pattern, given the existing development either side of Longfield Road. The contribution of the Site to Purpose A cannot be considered to be strong.
- 3.11 In regard to Purpose B (to prevent neighbouring towns merging into one another), the PPG is clear that this relates to merging of towns and not villages. Similarly, in regard to Purpose D (to preserve the setting and special character of historic towns), the PPG is clear that this relates to historic towns, and where these aren’t present, it may not be necessary to provide a detailed assessment. In this regard, Hook Green cannot be described as a town, and the contribution of the Site to either purpose is not strong. The Committee Report for the Norwood Lane application is consistent with this view at Paragraphs 6.41 and 6.42.
- 3.12 This qualifies the Site to be eligible as grey belt based on the definition within the NPPF.
- 3.13 In terms of whether the development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan there is a need to consider Green Belt purpose (c), encroachment on the countryside.
- 3.14 The Site comprises an arable field on the western edge of Hook Green, forming part of the settlement fringe. While it is currently in agricultural use, its character is influenced by the adjacent built form and boundary vegetation, giving it a transitional quality rather than an open rural setting. Whilst the southern boundary is undefined, the local topography provides some separation between the Site and wider landscape. The proposed development also includes an area of open space along the southern boundary, and a layered landscape buffer along the entirety of the southern boundary, which links with existing woodland to the south. This will reinforce the new settlement edge, reduce the Site’s visual and physical relationship with the wider countryside, and help prevent further encroachment. As such, the Site is considered to make a moderate contribution to Purpose C.

² Application Ref: 20251116

- 3.15 A recent appeal in Tandridge for an outline application seeking the development of 206 homes and an integrated retirement community in the Green Belt was allowed³. In that case, Tandridge District Council concluded that the Site was Grey Belt land but argued that the development failed NPPF paragraph 155(a) due to the wider purposes. The Inspector considered whether the development would fundamentally undermine the purposes, taking into account the developable area and the wider Green Belt across the area of the Plan. He concluded at paragraph 9 that *“the appellant has done all it could through the scheme’s design to minimise its impact on the surrounding Green Belt land”*, including views from PRoWs within and beyond the Site *“the impact of the development on the wider Green Belt locally, let alone on the Green Belt within Tandridge as a whole, would be negligible”*, even with “filtered views” in the winter months.
- 3.16 The conclusions on Purposes A, B, C and D are also consistent with the site specific Green Belt Assessment, prepared by Tyler Grange, provided at Section 8 of the submitted LVIA.
- 3.17 Accordingly, the proposals meet the tests in NPPF Policy GB7(1)(g)(i) as it would also not fundamentally undermine all of the purposes (taken together) of the remaining Green Belt across the area of the plan.

Policy GB7(1)(g)(ii)

- 3.18 As evidenced in the submitted Planning Statement, there is a demonstrable unmet need for housing in the Borough.
- 3.19 However, since that time the 2025 Housing Delivery Test result was published on 17 August, identifying a score of 61% for Gravesham. This confirms that GBC have failed the HDT in every year between 2018 and 2025.
- 3.20 Furthermore, GBC’s most recently published Five Year Housing Land Supply Statement (published in July 2026) indicates a best case 2.53 years supply, with a substantial deficit of 2,003 dwellings. This is without the Applicant critiquing the delivery of a single dwelling in the supply and should attract substantial weight in the planning balance.

Policy GB7(1)(g)(iii)

- 3.21 Hook Green is one of GBC’s largest and most sustainable settlements, incorporating a good range of facilities and services which cater for the needs of local residents. It is a second-tier settlement within the adopted settlement hierarchy, reflecting its sustainability.
- 3.22 Hook Green clearly plays an important role and function with a range of services and opportunities for employment, retail and education. The village serves a wide catchment area and is served by excellent public transport links being located on the A227 and with its own train station, which provides access to London and the Medway Towns.
- 3.23 The Spatial Development Strategy for the emerging Local Plan supports the potential for growth in Hook Green, once again identifying Hook Green Meopham as a second-tier

³ Appeal Ref: APP/M3645/W/25/3374913 (CD6.1)

settlement, defined as “Large Villages including clustered sustainable settlements - Suitable for expansion and accommodating some growth.”

- 3.24 The submitted Transport Assessment establishes the location of the application site and highlights the presence of services and facilities within a reasonable walking and cycle distance. This includes Camer Parade, located in close proximity, and which is identified within the adopted and emerging Local Plans as a “Local Centre” which meets the “everyday needs” of the local community. The presence of public transport links to other facilities and nearby settlements is also identified. This demonstrates that the site is located sustainably.
- 3.25 Nevertheless, the applicant recognises certain limitations of the current bus services passing along the site frontage. Therefore, a contribution strategy is being developed in order to ensure that the site is accessible to facilities, services, and other transport interchanges that are located slightly further afield e.g. Gravesend including services and other employment and improved links to Meopham railway station.
- 3.26 In addition, the Applicant will be making suitable financial contributions to the LCWiP.
- 3.27 It is concluded that the Site complies with the third criterion and should be considered as a sustainable location as confirmed by National Highways and Kent County Council.

Policy GB7(1)(g)(iv)

- 3.28 The fourth criterion comprises the requirement to comply with Policy GB8, which establishes ‘The Golden Rules’. The proposals would fully comply, and the following is highlighted:
- Provision of a minimum of 50% affordable housing which equates to 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development (Policy CS16 of the Core Strategy seeks up to 35%). Applications for 50% affordable housing in this location will also support the worsening affordability of the Borough and meet local needs. This provision would be secured through the Section 106 agreement.
 - Contribute to necessary improvements to local or national infrastructure. The proposals would provide necessary improvements to local infrastructure through offsite active travel improvements. This includes a significant contribution to a bespoke bus service. This provision would be secured through the Section 106 agreement.
 - Contribute to the provision of new, or improvements to existing, green spaces that are accessible to the public (existing and future residents of Hook Green). The proposals would provide new green spaces which are accessible to the public with the provision of 1.89 ha of publicly accessible open space (excluding 0.55 ha of SUDS), which is an overprovision of 68%. This provision is secured through the submitted Parameter Plan.
- 3.29 Accordingly, it is concluded that the Site is grey belt land, and the proposals meet the Golden Rules set out in the NPPF. The proposals are therefore not inappropriate

development in the Green Belt and 'very special circumstances' do not need to be demonstrated.

- 3.30 Policy GB8(2) states that when considering applications for major development involving the provision of housing on sites in the Green Belt subject to a planning application, substantial weight should be given to the importance of complying with the Golden Rules.
- 3.31 A recent judgment⁴ reaffirmed the position that appropriate development does not give rise to harm to the Green Belt. The judgment states at Paragraph 19 that *"it is quite clear 'buildings for agriculture and forestry', and other development that is not 'inappropriate' in the green belt, are not to be regarded as harmful either to the openness of the green belt or to the purposes of including land in the green belt"*.

Very Special Circumstances

- 3.32 As noted above, having had due regard Annex E of the NPPF, it is evident that the site makes a moderate contribution to Green Belt purpose A, and a contribution to purposes B or D which would be weak or none. The contribution to Purpose C has also been considered above and the submitted Green Belt Assessment considers this to be weak.
- 3.33 In the event that the proposals are considered to be inappropriate development in the Green Belt, 'very special circumstances' will exist where any potential harm to the Green Belt by way of inappropriateness and any other harm is clearly outweighed by other considerations, as established by Policy GB6 of the NPPF. The policy also states that when making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness.
- 3.34 GBC is heavily constrained by Green Belt and is therefore having to look at Green Belt locations to accommodate the Borough's housing needs.
- 3.35 The significant economic, social and environmental benefits of the proposals are set out below and in the submitted Planning Statement. It is considered any harm is clearly outweighed by the significant benefits which attract very substantial weight and that very special circumstances exist in this instance. This includes the provision of new high quality market housing and a 50% level of affordable housing in an area where there is evidence of a historic shortfall of affordable housing delivery and significant unmet need.

Summary on Principle of Development

- 3.36 The Core Strategy is significantly out of date given its age and the lack of consistency with the NPPF, particularly in respect of Green Belt policy. In accordance with Annex A of the NPPF, Local Plan policies which are materially inconsistent with the decision-making policies of the NPPF should be given very limited weight.
- 3.37 Nevertheless, as set out in the submitted Planning Statement, the proposals comply with the principle of Policy CS02 which supports proposals where they accord with national policy on Green Belt. The Policy is positively drafted and supports development outside rural settlements that are inset from the Green Belt (such as the Application Site) which maintain and diversify the rural economy and are compatible with national policies for

⁴ Mole Valley District Council v MHCG [2025] EWHC 2127 (Admin)

protecting Green Belt. The Application Site therefore fully accords with both National and Local Policies in respect of development in the Green Belt.

- 3.38 The Applicant can demonstrate that the site is not inappropriate development through grey belt provisions in the NPPF. Policy S5(5) states that where development would not be inappropriate, proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of this policy.
- 3.39 This balancing exercise is undertaken in the Conclusion of this Statement, where the significant economic, social and environmental benefits of the proposals are set out. This includes the provision of new high quality market housing and a 50% level of affordable housing in an area where there is evidence of a historic shortfall of affordable housing delivery and significant unmet need.
- 3.40 Policy HO7 is clear that substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community.
- 3.41 The Applicant can also demonstrate that the benefits of the proposed development also comprise very special circumstances that substantially outweigh any harm to the Green Belt having regard to Policy GB6 of the NPPF.
- 3.42 The Site forms a logical extension to the existing residential area of Hook Green and goes some way to meeting the housing needs of GBC.

Highways

- 3.43 Since the submission of the application in October 2025, an updated Transport Assessment and Travel Plan was submitted in April 2026, in order to address comments from National Highways (NH) and Kent County Council (KCC). A further three Technical Notes (TN2, TN3 and T4) were also prepared and submitted during the summer of 2026.
- 3.44 Both NH and KCC have now confirmed that there is no objection to the proposals on highways grounds subject to the imposition of conditions and obligations, which are to be agreed.

Ecology

- 3.45 Since the submission of the application, an updated BNG Metric was submitted in June 2026 in order to address comments from KCC Ecology.
- 3.46 KCC have now confirmed that there is no objection to the proposals on ecology grounds subject to the imposition of conditions, which are to be agreed.

Other Technical Matters

- 3.47 A review of the 2026 NPPF has been undertaken by the consultants responsible for preparing the original submission documents. After a full review, it is considered that the

recommendations of the submitted Reports do not require amending and would reach the same conclusion.

- 3.48 It is also considered that there are no other technical matters raised by consultees which need to be addressed.

Summary

- 3.49 The subject Site is available for development, suitable, sustainably located and development here would be achievable with the scheme being partially complete within five years.
- 3.50 It has been demonstrated that the site is grey belt and therefore development should not be regarded as inappropriate having regard to the NPPF's 'Golden Rules'. Whilst in outline, the application demonstrates how a residential development could be brought forward at the site that is compliant with the technical policies of the adopted Local Plan. Moreover, there are no known technical constraints or viability issues, and any scheme would provide a policy compliant suite of planning obligations.

4. Conclusion

- 4.1 This Planning Statement has been prepared in support of an outline application for the demolition of existing buildings and erection of up to 120 dwellings (Use Class C3) with all other matters reserved except for the point access off Longfield Road. The application is submitted on behalf of Richborough.

Case for Development

- 4.2 This statement demonstrates that the proposals respond positively to the adopted Development Plan policies as well as those other material considerations identified. Policy S3 of the NPPF is clear that in all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay. However, should a conflict arise with the development plan, those policies should be afforded reduced weight due to inconsistency with the NPPF and the lack of clear evidence that the necessary level of housing will be delivered in the future.
- 4.3 There are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations.
- 4.4 The proposal is in accordance with the broad spatial strategy set out in Policy CS02, which supports proposals in the Green Belt and rural area where they accord with national policy on Green Belt. It has been demonstrated that the site comprises grey belt in line with the updated NPPF definition. In this regard:
- Hook Green is a village and not a 'large built up area', meaning that the Site cannot contribute strongly to Purpose A of Green Belt. In any event, the development would not result in an incongruous pattern, given the existing development on the adjacent side of Longfield Road and to the immediate east. The contribution of the site to Purpose A cannot be considered to be strong.
 - Hook Green is a village and is not considered a town or historic town and therefore cannot be considered to contribute strongly to Purposes B or D.
 - The proposals also comply with the Golden Rules established at Policy GB8 of the NPPF, including the provision of 50% affordable housing and accessible green space.
- 4.5 The site is also identified as part of a draft allocation in the emerging Local Plan for 210 dwellings. This demonstrates that the Council consider the site to be suitable for residential development and capable of delivering new housing of this kind of scale.
- 4.6 The proposals are therefore not inappropriate development in the Green Belt and 'very special circumstances' do not need to be demonstrated.
- 4.7 It is the intention to deliver housing quickly on the site with all dwellings being completed within the five year monitoring period. This will include the delivery of affordable dwellings.

- 4.8 The design concept outlined in the Design and Access Statement, alongside the submitted Parameter Plan would secure a high-quality development.
- 4.9 The development of the site would be both suitable and sustainable.

Benefits

- 4.10 Subject to planning permission being granted, there are numerous socio-economic and environmental benefits which would arise from the proposed development. These benefits are established throughout this Statement and can be summarised as:
- The provision of new high quality market housing in a sustainable location in an area where the claimed level of deliverable supply is only 2.53 years;
 - The provision of a 50% level of affordable housing in an area where there is evidence of a historic shortfall of affordable housing delivery and significant unmet need. Policy HO7 of the NPPF is clear that substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community. This should apply to the delivery of market and affordable housing;
 - The provision of smaller housing for which there is an identified need within the Meopham Rural Housing Needs Survey. This will increase opportunities for under-occupied housing to be made available to younger families;
 - Opportunity to enhance sustainable modes of transport through the provision of pedestrian infrastructure improvement, including to the station, and traffic calming measures that improve the existing pedestrian environment around the schools on Longfield Road;
 - The scheme would deliver formal/informal greenspace and play space at a rate that well exceeds requirements and will be for use by new and existing residents with long-term management secured;
 - The retention of existing ecological habitats. The ecology of the site will be improved through the provision of new green infrastructure which will achieve a 10% net gain in biodiversity;
 - Creation of employment opportunities through the construction phase of the development;
 - The proposed development will increase the number of economically active residents, boosting income and local expenditure.
- 4.11 The range of benefits are substantial in nature and should be given significant weight at the top end of the scale within the planning balance.

Harm/Balance

- 4.12 Policy S5(5) of the NPPF states that where development in the Green Belt would not be inappropriate, proposals should be approved unless the benefits of doing so would be

substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of this policy.

4.13 It is accepted that through the construction and delivery of the proposals, there will be some localised harms:

- The site is a greenfield site, and the scheme will inevitably result in a change of the character of the site despite complying with development plan and national policy on landscape. The LVIA confirms that at Year 1, the maximum level of landscape effect is judged to be Major/Moderate adverse at the Site level, reducing to Minor adverse on the surrounding landscape. By Year 15, following the establishment of mitigation planting and green infrastructure, the maximum level of landscape effect reduces to Moderate adverse at the Site level, and Negligible adverse on the wider landscape. This reflects that, whilst the scheme will result in a change in character locally, it is not entirely out of character with the locality, where similar development is situated in close proximity and influences the character of the landscape. It is also not identified as a landscape of particular value.
- There will be impacts arising from construction vehicles and traffic which will be temporary. It is inevitable that there will be traffic movements generated by the proposals, and those expected are set out in the TA, and it is not considered that there are any unacceptable or severe highway impacts arising from the scheme.
- Whilst some small areas of grade 2 agricultural land would be lost it is also the case that the social and economic benefits outweigh this loss.

4.14 As with any site located on the edge of a settlement, urbanising development may introduce changes to the area. However, the submitted LVIA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts. When considering landscape impacts, it is important to bear in mind that GBC is likely to be reliant on greenfield development to meet its housing needs going forward. Any greenfield development will have some landscape impacts, and the limited, highly localised impacts of the scheme, identified within the LVIA, must be considered in that context.

4.15 Furthermore, when applying paragraph 2 of Policy S5, the proposals would not fail to comply with the national decision-making policies which state that development proposals should be refused in specific circumstances.

4.16 In relation to other matters set out in the submitted Planning Statement, such as trees, heritage, noise, highways and traffic, air quality, flood risk and drainage, and ground conditions, it is considered that the proposed development has been demonstrated to be acceptable, in accordance with the development plan and the NPPF.

4.17 In conclusion, the adverse impacts do not substantially outweigh the benefits of the scheme when assessed against the national decision-making policies in this Framework and applying paragraph 2 of this policy. The proposals should therefore be granted, as set out in Policy S5(5) of the NPPF.

4.18 It is clear that the proposals represent sustainable development which will make a positive difference, creating an appealing well-designed neighbourhood, including affordable

homes, which respects its context and caters for identified needs. Taking the above into consideration, there is a compelling case for the granting of planning permission at the earliest opportunity.