

23 February 2026
Submitted via email

Alison Webster
Gravesham Borough Council
Civic Centre
Gravesend
DA12 1AU

Dear Alison,

**OUTLINE PLANNING APPLICATION 20251116 – LAND WEST OF NORWOOD LANE, MEOPHAM
PROPOSED CAPACITY IN THE DRAFT LOCAL PLAN ALLOCATION**

As you will be aware, Members approved the publication draft of the emerging Local Plan for the Regulation 19 consultation stage at Cabinet on 2nd February 2026. The publication draft proposes to allocate the site for residential development as below.

POLICY LP7.3A: LAND WEST OF NORWOOD LANE

In addition to meeting the policies in the plan, development proposals for the site must meet the following criteria:

- Primary vehicular access shall be provided onto Norwood Lane to a design that satisfies the Highway Authority in terms of accessibility and safety. A secondary pedestrian and cycle access, capable of being used as an emergency access shall also be provided in a location be agreed.*
- Prominent walking and cycling access and routes must be provided through the site adjacent Green Lane connecting to the surrounding highways and local public rights of way networks, supporting active travel to Camer Parade Local Centre, schools and Camer Country Park. Additional walking and cycling access via Tradescant Drive /Danesway will facilitate safe walking and cycling routes to Meopham Railway station. The alignment of the public right of way bisecting the site shall be safeguarded.*

Turley (Reading)
The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830 turley.co.uk

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- *A coherent landscaping strategy shall be provided, informed by a LVIA, to mitigate impacts on the adjacent Kent Downs National Landscape.*
- *Safeguard and enhance local ecology including existing priority habitats such as Churchway Wood. An ecological impact assessment and species survey will be required to inform appropriate ecological mitigation to protect and enhance the sites biodiversity value and the species it supports.*

Whilst the draft allocation wording does not explicitly reference the draft allocation yield figure for the site, supporting paragraph 6.156 notes that the site *'is allocated to deliver around 120 homes'*.

It is understood that the yield figure is based on the outputs from the SHLAA, where an adjustment to the gross site area has been applied to take account of specific factors prior to the application of the gross to net ratio, such as the setting of the Kent Downs National Landscape.

The live outline planning application for the site (ref 20251116), submitted in November 2025, proposes residential development of up to 150 dwellings. This is based on the technical work undertaken to inform the net developable area and assumptions on density which are set out in the submitted parameters plan, to which no statutory consultee responses have raised an objection to the scale or extent of development proposed.

Landscape and Visual Impact

Of particular relevance to the site's technical assessment was the work undertaken in respect of landscape and visual impact. A Landscape and Visual Impact Appraisal was submitted with the outline application.

The North Kent Downs National Landscape lies immediately to the south-east of the Site. The Site lies within its setting and there are views towards the National Landscape from the public footpath which crosses the Site. However, ZTV modelling (confirmed with a site survey) identified that visibility of the Site from within the National Landscape is very low, due to the presence of mature vegetation around the edge of the National Landscape. The contribution of the Site to the Scenic Beauty and defined Special Qualities of the National Landscape was also assessed and found to be very low. The principal contribution being a small copse within the Site (Churchway Wood) which forms a local landscape feature and is part of a pattern of small woods and copses in the local setting to the National Landscape. Boundary hedgerows and trees around the perimeter of the Site were also identified as locally important landscape features.

The landscape and visual analysis have informed the evolution of the design principles and landscape strategy for the Site to ensure a landscape-led approach. The application proposes to retain and enhance important landscape features including Churchway Copse and boundary hedgerows and trees. In order to mitigate impacts on landscape and visual receptors (including, in particular, the National Landscape to the south-east) the developable area was set back from the Site boundaries and a strong framework of landscape zones and new planting proposed. The existing footpath across the Site is to be retained and formalised with a new connection to Camer Park Road created to provide an improved, safer access to Camer Country Park (in the National Landscape). The landscape strategy incorporates substantial planting, which would soften views of the Proposed Development from the approach routes to Hook Green from the east.

The Landscape and Visual Impact Appraisal confirms that the site can accommodate development at the level proposed, and that doing so would not result in unacceptable landscape or visual harm. The LVIA identifies the site as an arable field of medium landscape value, lying adjacent to existing post-war

housing and making only a moderate contribution to the Meopham Downs character area. Its landscape features—aside from Churchway Wood—are fragmented, in mixed condition and capable of enhancement through a comprehensive landscape strategy.

Importantly, the LVIA demonstrates that the site is well contained by existing built form, mature vegetation and the surrounding road network, meaning landscape effects remain localised even with development. Visual effects beyond the immediate site are limited, with low residual impact on the adjacent Kent Downs National Landscape due to strong screening, careful site layout and a substantial green buffer along the boundary.

The proposals also deliver significant landscape enhancements that are achievable and effective at a 150-home scale. These include retention and strengthening of key landscape features, extensive new tree and hedgerow planting, improved public open space, and an upgraded right-of-way network, including a new link to Camer Country Park. These measures result in beneficial long-term effects on tree cover, green infrastructure and local landscape structure.

Overall, the LVIA concludes that landscape and visual impacts are limited, contained and capable of successful mitigation, with no meaningful effect on the wider Meopham Downs landscape or the special qualities of the Kent Downs. There is nothing within the landscape evidence to justify capping the development at 120 homes; the site can accommodate 150 homes within a robust landscape framework that preserves settlement separation, respects local character and delivers net landscape improvements.

In response to the application, Kent Downs National Landscape have acknowledged that the site forms a logical extension to the existing village and would be contained by Norwood Land and Green Lane, and that should the Council be minded to accept the principle of development here, it will be essential for an appropriate interface and soft, landscaped edge to be provided along the southern and eastern boundaries to ensure an appropriate relationship with the adjacent National Landscape and to assist in mitigating impacts.

Transport and Highways

The draft allocation proposes primary vehicular access shall be provided onto Norwood Lane to a design that satisfied the Highway Authority in terms of accessibility and safety, however it is our understanding that this is a drafting error and will be amended in the consultation version.

The submitted Transport Assessment demonstrates that the proposed development of up to 150 homes can be accommodated on the local highway network without giving rise to an unacceptable or “severe” impact via access onto Green Lane. Junction modelling across the local highway network shows that, even under the highest traffic scenario, the development generates only a 1–3% increase in flows. Resulting queue and delay changes are minimal, typically no more than one passenger-car unit, and all junctions continue to operate well within capacity.

The development includes a comprehensive package of off-site improvements that enhance safety and support sustainable travel. These measures include new and extended footways on Green Lane, a raised pedestrian crossing and new refuge island at the A227 junction, additional street lighting and a proposed speed limit reduction to 30mph along the site frontage. These interventions improve pedestrian visibility, crossing opportunities and overall network safety for both new and existing residents.

The assessment also confirms there is no underlying highway safety issue that would constrain development. As such, the evidence demonstrates that the proposed 150-home scheme is appropriate in highways and transport terms. The development provides safe and suitable access for all users,

facilitates sustainable travel, meets national and local policy tests and results in no severe residual impact on the highway network.

Ecology and Arboriculture

No statutory or non-statutory nature conservation designations are present within or adjacent to the site. All of the ecological designations in the surrounding area are physically well separated from the site and are unlikely to be adversely affected by the proposals. The habitat survey has established that the site is dominated by habitats not considered to be of ecological importance, whilst the proposals have sought to retain those features identified to be of value as part of the net developable area. The opportunity to positively contribute to the draft Kent and Medway Local Nature Recovery Strategy is presented through the enhancement of on-site woodland habitats and on-site connectivity.

The habitats within the site support several protected species, including species protected under both national and European legislation. Accordingly, a number of mitigation measures have been proposed to minimise the risk of harm to protected species, with compensatory measures proposed, where appropriate, in order to maintain the conservation status of local populations. In particular, the indicated main spine road is located remote from the tree belt on the western boundary and from Churchway Wood. South of Churchway Wood it acts as the edge of the developed area and results in generous separation from the tree belt and woodland. This ensures residential properties, within the indicated residential parcels, are remote from these significant tree features avoiding undue pressure upon the trees in future years. That generous separation continues east and north of Churchway Wood where residential parcels are separated from the wood by the 15m wide buffer.

Heritage and Archaeology

The heritage assessment confirms that the site presents no heritage constraints that would limit development to 120 homes rather than 150. The Desk-Based Assessment identifies no designated archaeological assets within or near the site, and no designated built heritage asset for which the site forms a key or sensitive part of its setting. The site is an agricultural field with a long history of cultivation and has not been subject to prior built development. Any archaeological interest present is expected to be of low local significance, and a standard archaeological evaluation can be secured through a planning condition. There is therefore no archaeological reason to limit development capacity.

With regard to built heritage, the assessment confirms that the site does not contribute meaningfully to the significance of most nearby listed buildings. It makes no contribution at all to the significance of Grade II Norwood Farmhouse due to distance, modern separation and lack of intervisibility. For the Camer House group (three Grade II listed buildings), the site forms only a low to low-moderate element of their wider setting, with limited views and no effect on their architectural or historic interest. The assessment concludes that the development would result in only a low level of less-than-substantial harm to the Grade II Bailiff's House arising from minor erosion of its broader rural-agricultural context. This degree of harm is already fully acknowledged as low and, in National Planning Policy Framework terms, must be weighed against public benefits.

The only other identified impact relates to the Grade II* Church of St Mildred, where development slightly alters one long-range viewing corridor. The assessment again concludes this represents only a low degree of less-than-substantial harm, with the key mitigating measure—retention of a long-distance view corridor—already embedded within the development design and illustrated on the parameter plan.

As such, the heritage assessment demonstrates that the site can accommodate 150 homes without causing significant or policy-conflicting harm to heritage assets. The minor levels of residual harm

identified are very low, affect only limited aspects of wider settings, and are fully capable of being outweighed by the substantial public benefits of delivering additional housing, including affordable homes, improved access, and enhanced landscape infrastructure. There is therefore no heritage justification for reducing the scale of development to 120 units when the evidence clearly shows that 150 homes can be delivered appropriately and sensitively.

Furthermore, KCC Heritage and Historic England have not raised an objection to the application, nor have their formal responses raised any concerns with the extent of development proposed on site.

Flood Risk and Drainage

The Flood Risk Assessment (FRA) provides clear, robust evidence that the site can safely and sustainably accommodate 150 homes, with no requirement to reduce capacity on flood-risk grounds. The assessment confirms that the site is wholly within Flood Zone 1, the lowest category of flood probability, with an annual chance of fluvial or tidal flooding of less than 0.1% (1 in 1,000 years). The Environment Agency also confirms that it holds no historical records of flooding at this location. Southern Water likewise confirms no sewer flooding incidents within the past 10 years in the surrounding area. There is therefore no baseline flood constraint that would require limiting development.

Surface water modelling shows that the site is at 'very low' risk of surface water flooding, with only isolated pockets of shallow ponding of around 0.2m at the site's northern edge and along Norwood Lane, all of which occur during extreme (1% AEP) rainfall events. Even when applying future climate change allowances, these areas remain low-risk, shallow, and easily addressed through earthworks and the site-wide drainage strategy. As the FRA concludes, these minor surface water effects do not impede safe access or egress.

In respect of drainage, the proposals include three large infiltration basins, permeable paving and on-site attenuation, all proven deliverable through infiltration testing demonstrating highly favourable infiltration rates across the site. Storage volumes have been designed with safe freeboard, exceedance routing and full pollution control, ensuring that no runoff will leave the site at a greater rate or volume than at present. As a result, the development will not increase flood risk off-site, and in practice will reduce existing unmanaged greenfield runoff by introducing formalised drainage where none currently exists.

As such, the evidence demonstrates that there are no flood-risk grounds to restrict development to 120 units. The FRA confirms that 150 homes can be delivered safely, that the site presents no significant flooding constraints.

In addition, KCC Flood and Water Management have raised no objection to the extent of development proposed, noting that the results indicate favourable infiltration rates, supporting the use of basins to manage runoff.

Summary

The site integrates well with its surroundings, retains space for green infrastructure, open spaces, and landscaping buffers, allowing a logical extension to the existing settlement pattern and supporting walkable access to local services, education, transport links and community facilities. It is not considered that the difference from 120 to 150 homes introduces harmful visual, landscape or amenity impacts, and continues to respect both local character and neighbouring properties. To reiterate, no statutory consultee responses have raised an objection to the scale or extent of development proposed.

In conclusion, the evidence demonstrates that the site is capable of accommodating 150 homes in accordance with the submitted Land Use and Access Parameter Plan, which demonstrates a lower density along the rural edge of the site whilst still making effective use of the land. The proposal enables more efficient use of the site, in accordance with paragraph 129 of the Framework, without compromising character, amenity or environmental quality. Importantly, delivering the up to 150 homes on site will make a greater contribution towards meeting identified housing needs, particularly in relation to affordable housing, with 50% of the site being delivered as affordable housing. This is a major benefit of the scheme, which could deliver up to 15 extra affordable homes in Meopham over the draft allocation site capacity. The site is capable of being delivered in the first five years and would seek to address the shortfall in housing across the borough.

Yours sincerely

Alison Young

Associate Director

Alison.young@turley.co.uk