



SEPTEMBER
2026

Land North of Camer Road, Meopham

NPPF 2026 Planning Statement Update

Iceni Projects Limited on behalf of
the McManus Family

September 2026

ICENI PROJECTS LIMITED
ON BEHALF OF THE
MCMANUS FAMILY

Iceni Projects

Birmingham: The Colmore Building, 20 Colmore Circus Queensway, Birmingham B4 6AT

Edinburgh: 11 Alva Street, Edinburgh, EH2 4PH

Glasgow: 177 West George Street, Glasgow, G2 2LB

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Manchester: This is the Space, 68 Quay Street, Manchester, M3 3EJ

t: 020 3640 8508 | w: iceniprojects.com | e: mail@iceniprojects.com

linkedin: linkedin.com/company/iceni-projects | twitter: [@iceniprojects](https://twitter.com/iceniprojects)

Land North of Camer Road, Meopham
NPPF 2026 PLANNING STATEMENT UPDATE

CONTENTS

1. INTRODUCTION 1

2. PLANNING POLICY UPDATE 2

3. POLICY ASSESSMENT..... 4

4. PLANNING BALANCE 11

5. SUMMARY AND CONCLUSIONS 15

APPENDICES

A1 – LOCAL PLAN POLICY CONSISTENCY WITH NPPF (2026)

1. INTRODUCTION

- 1.1 This Addendum has been prepared by Icen Projects Limited ('Icen') on behalf of the McManus Family ('the Applicant') to the Planning Statement submitted in support of application ref: **20260207** at Land North of Camer Road, Meopham.
- 1.2 The Planning Statement, submitted in February 2026, was prepared under the National Planning Policy Framework (NPPF) published in December 2024. However, on 17th August 2026, the Government published a revised NPPF which replaces the 2024 version (referred to as the "2026 Framework"). This is a material consideration of critical importance in the determination of this application.
- 1.3 The 2026 Framework represents a significant restructuring of national planning policy. This Addendum therefore reconsiders the Local Plan policies against the 2026 Framework and revisits the consistency conclusions, alongside setting out the principle of development against the updated policy tests. All other content of the Planning Statement remains unchanged unless expressly stated.
- 1.4 Overall, it is considered that the changes to the Framework do not alter the overall conclusions reached in the Planning Statement and that the case in favour of the scheme remains compellingly in favour of granting permission.

2. PLANNING POLICY UPDATE

New NPPF 2026

- 2.1 The new NPPF was published on 17th August 2026. Whilst the overall direction of the Framework remains the same, with a focus on achieving significant economic growth and housing delivery, including delivering 1.5 million homes, the 2026 Framework represents a significant restructuring of national planning policy.
- 2.2 The 2026 Framework is organised into thematic chapters, each containing separate plan-making policies and national decision-making policies. The most important changes relevant to this application are summarised below:

Presumption in favour of sustainable development

- 2.3 The presumption in favour of sustainable development is now expressed through Policy S3, with Policy S4 applying to development within settlements and Policy S5 applying to development outside settlements. The relevant test for decision-making has been recast so that development should be approved unless the benefits would be ‘substantially outweighed’ by adverse effects, in place of the ‘significantly and demonstrably’ wording of former paragraph 11(d).

Where it was formerly considered that the presumption in favour of sustainable development at paragraph 11d of the Framework (2024) was engaged in respect of the application, the presumption is now engaged through the conformity of the application proposal to NPPF Policy S5(5) (and Policy GB7).

Green Belt and grey belt

- 2.4 The five Green Belt purposes are now set out in Policy GB2, control of development in Policy GB6, the categories of development that are not inappropriate (including grey belt) in Policy GB7, and the Golden Rules in Policy GB8. The grey belt definition in Annex B continues to refer to purposes (a), (b) and (d). It should be noted that the reference to Footnote 7 has been removed.

Weight to existing plan policies

- 2.5 Former paragraph 232 is replaced by Annex A, paragraph 2, which states that development plan policies (or parts of policies) that are materially inconsistent with the national decision-making policies in the 2026 Framework should be given very limited weight.

Consistency with Local Plan Policies

- 2.6 Previously, a policy weighting table was provided which gave weight to all relevant Local Plan policies in accordance with their consistency with the NPPF (2024). An updated policy weighting table is available at **Appendix A** of this document, which gives weight to all relevant Local Plan policies in accordance with their consistency with the NPPF (2026).
- 2.7 It is considered that the policies within the Local Development Plan which are most important for determining this application, notably policy CS02, remain inconsistent with the Framework (2026), and when applying Annex A (paragraph 2), these policies should be given very limited weight.

3. POLICY ASSESSMENT

- 3.1 It is considered that the key conclusions drawn within the Planning Statement (February 2026) remain unchanged by the newly published Framework. However, for the avoidance of doubt, the planning case is set out below in the context of the revised national policy wording.

Principle of Development

- 3.2 NPPF Policy GB7(1)(g) states that development is **not** inappropriate in the Green Belt, and therefore should not be regarded as harmful to the Green Belt, where all 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.
- 3.3 With regard to point (i), as set out within the Planning Statement, the application Site is considered to meet the definition of grey belt, and it is considered that the proposed development would not undermine the overall purposes of the remaining Green Belt across the area of the Plan.
- 3.4 There is an evidenced unmet need for housing and affordable housing within the Borough, as set out in the Planning Statement, in accordance with part (ii).
- 3.5 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, as described in the Planning Statement and transport assessment submitted with the application.
- 3.6 Furthermore, Policy TR3 states that, in rural areas, opportunities to improve walking, wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed. The proposed development includes a number of measures to enhance the sustainability and connectivity of the Site, including: a number of additional active travel routes within the Site which have been designed to be attractive and safe for all users, including an additional dedicated pedestrian access to Sole Street Station, a dedicated bus route starting and terminating on the Site (at a high-quality public transport hub), upgrades to

the existing bus stop at Sole Street Station, and pedestrianisation of the southern half of Norwood Lane, alongside contributions to cycling infrastructure and PRow.

- 3.7 Additional facilities will also be provided through the proposed development, including a 2-form intake primary school, a local centre, and a range of sports facilities, which can be easily accessed by both future and existing residents through active travel modes.
- 3.8 Policy TR3 also makes reference to the connectivity tool. When reviewed in the context of Gravesham Borough, the majority of the Site falls within categories C and D. Category C represents areas with high-average localized connectivity, and Category D represents areas with mid-average localized connectivity. The guidance is clear that the Tool should be used alongside other relevant evidence in assessing connectivity, and it is considered that the proposed improvements to public transport infrastructure and active travel connections would significantly boost the connectivity score of the Site, alongside the new school, local centre and pedestrian route to Sole Street station.
- 3.9 Overall, it is considered that the proposed development is in accordance with part (iii).
- 3.10 With regard to part (iv), the proposed development complies with the Golden Rules at Policy GB8, as described in detail in the Planning Statement.
- 3.11 Therefore, the proposed development is wholly in accordance with all the relevant criteria at Policy GB7(1)(g) of the NPPF and would not be considered inappropriate development in the Green Belt.
- 3.12 Policy S5(5) states that where development would not be inappropriate within the Green Belt, through the application of Policy GB7, 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.
- 3.13 This is the context in which the application should be determined.

Railway Station Policy – GB7(1)(h)

- 3.14 The new NPPF introduced an additional category of development that would not be considered as inappropriate development in the Green Belt.
- 3.15 Under Part (h), this includes residential or mixed-use development which would:
- i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);
 - ii. Be physically well-related to the station or the settlement within which the station is located;

-
- iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;
 - iv. Not prejudice any proposals for long-term comprehensive development in the same location; and
 - v. In the case of proposals for major development, comply with policy GB8.
- 3.16 The Site is located adjacent to two railway stations, Meopham and Sole Street. It is considered that the proposed development wholly accords with parts ii – v of Policy GB7(1)(h). However, there is some minor dis-accordance with part (i).
- 3.17 Meopham station meets the definition of a “well-connected station” as per Annex B. The station is located a 640m walk from the Site boundary at Norwood Lane, and therefore, some of the proposed parcels of development would fall within the NPPF definition of “reasonable walking distance” from Meopham station.
- 3.18 However, this is limited to the westernmost development parcels only. The walking distance to Meopham station from the furthest parcel is approximately 1400m (or about 15-20 minutes’ walk). Whilst it should be acknowledged that many people would happily walk this distance on a daily basis, this does not meet the NPPF definition of “reasonable walking distance” at Annex B.
- 3.19 The majority of the Site, including the development parcels to the east, is located within a “reasonable walking distance” from Sole Street Railway Station. However, at present, this does not meet the NPPF definition of a “well-connected station” as although it is located within a top 80 Travel to Work Area and is served by two trains per hour in any one direction during peak travel to work hours, it is only served by one train per hour in any one direction during the middle of the day.
- 3.20 Overall, Policy GB7(1)(h) provides additional support for those parts of the proposed development that fall within reasonable walking distance of Meopham station. Furthermore, this is clearly a highly sustainable site with excellent connectivity, and although it does not accord with the precise requirements, it is considered that proposed development aligns with the aims and objectives of the policy as a whole, as it enables high-quality residential development in close proximity to two under-utilised train stations. This should be a material consideration in the planning balance.
- 3.21 However, the principal Green Belt policy case remains Policy GB7(1)(g).
-

Relevant Technical Considerations

Design

- 3.22 The outline proposals accord with Policy DP3 by responding to the site context and incorporating the seven features of well-designed places where relevant, as described within the Design and Access Statement. The submitted parameter plans also provide the framework for maintaining design quality at reserved matters stage, in accordance with Policy DP4.
- 3.23 Policy DP3(3) also states that substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals. The proposed development accords with local design policies, including Local Plan Policy CS19 and the Gravesham Design Code (2024), to ensure that a high-quality proposal can be delivered at the detailed design stage.
- 3.24 Furthermore, in accordance with Policy L3, the proposed development makes an efficient use of land by providing a density of 40dph over the net developable area of the Site, to ensure the Site is optimised for much-needed housing whilst also responding to the rural character of the surrounding area.

Landscape and Visual Impact

- 3.25 Policy N4(4) states that development proposals within the setting of Protected Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the Protected Landscape.
- 3.26 The proposed development has been sensitively located and designed to ensure that there will be no significant adverse impact on the setting of the Protected Landscape (Kent Downs) and in fact, the LVIA concludes that the effects on the Kent Downs Landscape will reduce over time, and following establishment of mitigation vegetation, would result in a negligible beneficial impact. Therefore, the development accords with the NPPF with regard to avoiding and minimising any adverse impacts on Protected Landscapes.

Ecology and Biodiversity

- 3.27 The proposals accord with Policies N2 and N3 through the retention and enhancement of valued trees, hedgerows and woodland; creation of a connected woodland and green-infrastructure network; and delivery of substantial biodiversity net gain.
- 3.28 The development will result in no significant harm to biodiversity and will instead provide species-specific mitigation and habitat enhancements, including a dedicated skylark area, to ensure that biodiversity is supported and enhanced. Specific mitigation measures such as swift bricks and bat boxes can also be incorporated at reserved matters stage/ secured via a suitably worded condition.

Agricultural Land

- 3.29 Policy N2(1)(b) states that development proposals should take into account the quality of agricultural land (including that classified as best and most versatile (BMV) agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible.
- 3.30 It is acknowledged that the proposal will involve the development of c. 42.1 ha of BMV land, however, as per the conclusions set out in the Agricultural Land Report prepared by Kernon Countryside Consultants, 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. Furthermore, development of BMV agricultural land will continue to need to be permitted to meet the increasing housing needs of the Borough.
- 3.31 Therefore, it is considered that the proposed development accords with Policy N2(1)(b).

Transport and Highways

- 3.32 The NPPF (2026) builds upon the previous provisions set out in the Framework, with a focus on supporting sustainable patterns of movement (prioritising walking, wheeling and cycling) and enabling good accessibility for different users, including the needs of disabled people, older people, children, women and girls.
- 3.33 The proposed development lies in a sustainable location adjacent to two railway stations, which would be made more sustainable through the comprehensive package of sustainable transport measures proposed through the scheme, including enhanced pedestrian and cycle connections, improved links towards the railway stations and surrounding settlements, and improvements to public transport provision. These measures would provide future residents with a genuine choice of transport modes and would reduce the need to rely exclusively on the private car, in accordance with Policy TR3. The proposals would also protect and enhance existing public rights of way, in accordance with Policy TR8.
- 3.34 The proposed movement strategy adopts a sustainable and inclusive approach, with walking, wheeling and cycling embedded within the overall design of the scheme, in accordance with Policy TR4. Further details would be secured at reserved matters stage.
- 3.35 Furthermore, the proposed development would not result in a severe adverse impact on the transport network or an unacceptable impact on highway safety, in accordance with Policy TR6(4).
- 3.36 Overall, it is considered that the proposed development wholly accords with Policies TR3, TR4, TR6 and TR8 of the NPPF.

Flood Risk and Drainage

- 3.37 In accordance with Policies CC3, F4, F5, F7 and F8 of the Framework, a site-specific Flood Risk Assessment and Drainage Strategy was submitted with the application which demonstrate that the proposed development would remain safe throughout its lifetime and would not increase flood risk elsewhere.
- 3.38 In accordance with Policy F5(2), a sequential test is not required, as the FRA clearly demonstrates that no built development, access, escape routes, land raising or vulnerable elements would be located in an area at risk, and any surface-water risk is safely addressed by layout and mitigation.

Heritage and Archaeology

- 3.39 The 'less than substantial harm' terminology has been removed from the updated Framework, leaving simply 'harm' to describe these effects. The heritage evidence concludes that the proposed development would result in no harm to designated heritage assets, and therefore the conclusions of the original Planning Statement remain largely unchanged, and the proposed development accords with Policies HE4 – HE6.

Climate Change and Sustainability

- 3.40 The development proposal is at the outline stage and therefore detailed design is subject to future determination, however the proposed development demonstrates a commitment to meeting the requirements of Policies CC2 and CC3 and takes account of the current and potential impacts of climate change over the lifetime of the scheme.
- 3.41 The landscape-led, mixed-use scheme promotes sustainable patterns of movement and incorporates community facilities to reduce the need to travel. It also provides substantial green infrastructure, woodland planting and habitat creation, supporting biodiversity and increasing opportunities for carbon storage. The development is also located within areas at the lowest risk of flooding and will incorporate multifunctional sustainable drainage systems.
- 3.42 Opportunities to incorporate renewable and low-carbon energy technologies will be explored in greater detail at Reserved Matter stage, however, as set out in the Sustainability and Energy Statement, the proposed scheme will seek to provide significant carbon dioxide emission reductions over the local and national standards.

Other Matters

- 3.43 Policy HC4 requires substantial weight to be given to the benefits arising from the provision of new or improved community facilities and public service infrastructure, and to development which makes a demonstrable contribution towards promoting good health, reducing health inequalities or supporting social interaction.

-
- 3.44 The proposed development includes the provision of new community facilities and infrastructure, including a primary school, local centre, sports pitches, clubhouse, play space, allotments and extensive green space. There is also extensive provision of green and blue infrastructure, active travel networks and public open space, which serve to contribute toward positive outcomes for physical health, mental wellbeing, social cohesion and environmental quality
- 3.45 This is supported by the consultee response received from KCC (Growth and Communities) which states that the proposals demonstrate a strong commitment to creating a healthy, active and sustainable community.

4. PLANNING BALANCE

- 4.1 As the proposed development complies with Policy GB7(1)(g) of the NPPF, the policy test at S5(5) is engaged, where proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects.
- 4.2 The benefits and harms of the proposed development, and their respective weightings, remain in general accordance with the Planning Statement (February 2026), with a few exceptions. As per Policy GB8(2), compliance with the Golden Rules should now be given “substantial weight” rather than “significant” weight. Substantial weight should also now be given to the provision of new or improved community facilities and public service infrastructure, and the creation of demonstrable public-health and social-interaction benefits, in accordance with Policy HC4.
- 4.3 For clarity, the scheme benefits and impacts are set out in Table 1 below:

Scheme Benefits	Scheme Impacts
Provision of much-needed housing - 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. This should be afforded substantial weight , in accordance with Policy HO7.	Loss of Agricultural Land – As per the assessment set out in the Planning Statement, the loss of 42.1 ha of BMV agricultural land should be afforded limited weight in this context, where BMV land will need to be released to meet the Borough’s housing needs, and where the economic benefits of the land parcel are limited.
Provision of affordable homes – The provision of up to 363 affordable new homes to meet affordable housing needs in the Borough should be afforded substantial weight in accordance with Policy HO7.	Landscape impact – The open nature of the landscape will be replaced by predominantly built form in the western part of the Site, resulting in a moderate adverse impact in the short term. However, 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. Therefore, it is considered that the temporary adverse impact should be given limited weight .
Provision of a new two-form intake primary school –	Impact on the setting of a Protected Landscape (Kent Downs) -

A new primary school in this location would not only meet local needs identified by KCC Education, it would also reduce travelling distances for families through the promotion of safe walking and cycling routes. This should be afforded substantial weight.	The proposed development is within the setting of a Protected Landscape, however it has been sensitively located and designed to minimise any adverse impacts. Therefore, this should be afforded limited weight.
Provision of a local centre and sports pitches, including a civic and sports hub - The provision of community facilities which would contribute towards promoting good health, reducing health inequalities and supporting social interaction in the local community should be afforded substantial weight, in accordance with Policy HC4.	
23ha of public open space – Including play areas, allotments and community growing areas, a dog park, and outdoor gym. This will help to support the health and well-being of residents and the wider public and should be afforded substantial weight.	
Improvements to active travel connections - Connectivity between Meopham and Sole Street would be enhanced through a network of walking and cycling routes, including a new pedestrian connection to Sole Street station. This should be afforded moderate weight in the planning balance.	
Improvements to public transport infrastructure - This includes funding a dedicated bus route starting and terminating on the Site (at a high-quality public transport hub), alongside upgrades to the existing bus stop at Sole Street Station. This should be afforded moderate weight in the planning balance.	
Significant biodiversity net gains – The scheme will deliver Biodiversity Net Gain in excess of 10% (c. 29%). This should be afforded moderate weight in the planning balance.	

Economic benefits – construction During the 6-year construction phase, around 3,304 construction jobs would be created. This should be afforded moderate weight in the planning balance.	
Economic benefits – operation The Proposed Development is estimated to generate 80 jobs once complete. 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. This should be afforded moderate weight in the planning balance.	
Golden Rules – The scheme is wholly in compliance with the Golden Rules, which should be afforded substantial weight, in accordance with Policy GB8.	

4.4 Overall, the extensive suite of benefits of the proposed development would not be substantially outweighed by its limited adverse effects, when assessed against the national decision-making policies of the NPPF (2026), including key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes.

4.5 Therefore, planning permission should be granted.

Policy GB6

4.6 However, should the decision-taker conclude that the development does not meet the criteria at Policy GB7(1)(g) of the NPPF, the determinative test would instead be Policy GB6. In that case, the determinative question is whether the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations, so as to amount to very special circumstances.

4.7 As set out within the Planning Statement (February 2026), a comprehensive suite of benefits exists which clearly outweigh the harms, including harm to the Green Belt which must be given substantial weight.

-
- 4.8 Therefore, the policy test at GB6 would be met, and very special circumstances would be deemed to exist, meaning that planning permission should be granted.

5. SUMMARY AND CONCLUSIONS

- 5.1 This Planning Statement Addendum sets out the planning case for the proposed development in the context of the updated NPPF (2026). Overall, it is considered that the key conclusions drawn within the Planning Statement (February 2026) remain unchanged.
- 5.2 It is considered that the Local Plan policies most relevant to the determination of this application remain inconsistent with the Framework and should therefore be given very limited weight.
- 5.3 The proposed development meets the relevant criteria at Policy GB7(1)(g) and would therefore not be considered as inappropriate development within the Green Belt. As such, the presumption in favour of sustainable development at Policy S5(5) applies, where 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 the Framework. The proposed development can come forward in this context to deliver a comprehensive suite of public benefits that would clearly outweigh any harms.
- 5.4 In the scenario that a decision taker concludes that the development amounts to inappropriate development in the Green Belt, the Applicant considers that the scheme benefits cumulatively clearly outweigh its harms so as to amount to the very special circumstances required by Policy GB6.
- 5.5 It is therefore requested that planning permission for the proposed development is **granted**.

A1. LOCAL PLAN POLICY CONSISTENCY WITH NPPF (2026)

Review of Gravesham Local Plan Core Strategy (2014) policies against their consistency with NPPF (2026)

Policy	Consistency with the Framework	Comments and Weighting to determine whether the Framework should be relied upon for decision taking
Policy CS01: Sustainable Development	Part-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 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 any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This reflects the aims of Policy S3 of the Framework (presumption in favour of sustainable development), however it is now broken down into development within settlements (S4) and development outside of settlements (S5) with a distinct set of criteria for each. The policy should be given <u>moderate</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>very limited weight</u>.
Policy CS10: Physical and Social Infrastructure	Part-consistent	This policy gives support to proposals that provide additional infrastructure to improve community well-being, in line with Policy HC3 and HC4. However, the Framework now goes further and explicitly gives substantial weight to the provision of public service infrastructure or community facilities. Furthermore, the supporting infrastructure schedule is based primarily on evidence from 2012 and 2013, which should be updated to reflect current needs. The policy should be given <u>moderate weight</u>.
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, by requiring: • vision-led planning from the earliest stage; • use of the Connectivity Tool alongside other evidence; • priority for walking, wheeling and cycling; • a genuine choice of transport modes; • consideration of reasonable future scenarios rather than a single predict-and-provide case; and

		• refusal only where impacts on capacity and congestion are severe or highway-safety impacts are unacceptable after mitigation The policy should be therefore given <u>moderate</u> weight, and the vision-led approach advocated by the Framework (at policies TR3, TR4 and TR6) 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. However, with regard to Protected Landscapes (formerly AONBs) there is a difference in the wording of the policies. Policy CS12 is more restrictive with regard to development in the setting of a Protected Landscape, stating 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”, whereas the NPPF focusses on mitigation and sensitive design, and states that “development proposals within the setting of Protected Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the Protected Landscape.” Overall, the policy should be given <u>moderate</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. 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 as it states that planning applications will be refused should they fail to make efficient use of land (Policy L3(4)). It does not however recognise that higher densities could be possible outside of the primary urban locations where they are well-related to transport infrastructure (as per Policy L3(2)). Policy L3 also provides further detail with regard to minimum densities depending on the location. 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. The policy doesn't account for the Golden Rules of the Framework (Policy GB8) 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 Policy DP3 and DP4 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 Policies HE4 – HE10 of the Framework, giving high priority to the preservation, protection, and enhancement of heritage assets and historic environment. It should be noted that the terminology has been revised under the new Framework to remove “less than substantial harm”, however the overall balancing exercise remains broadly aligned. The policy should be given <u>full</u> weight.