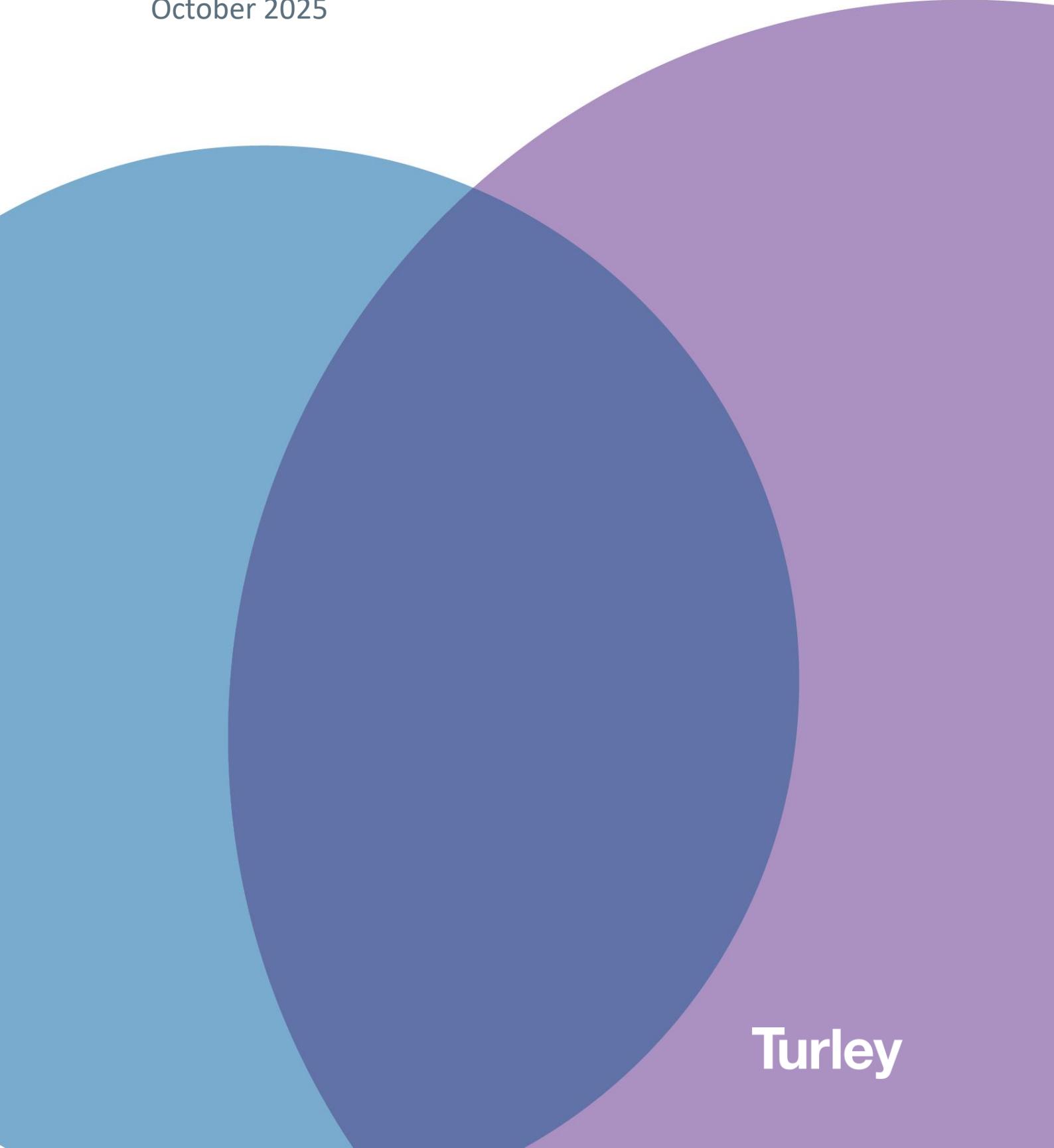


Planning Statement

Land west of Norwood Lane, Meopham

October 2025



Turley

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Client

Taylor Wimpey South East

Our reference

02651

31st October 2025

1. Introduction

1.1 This Planning Statement has been prepared by Turley on behalf of our client, Taylor Wimpey South East (hereafter referred to as the 'Applicant') in support of an outline planning application for residential development at land west of Norwood Lane, Meopham (hereafter referred to as the 'site'). A Site Location Plan is included at **Appendix 1**.

Description of Development

1.2 The submitted application seeks outline planning permission for the following:

"Outline application with all matters reserved (except access) for a development of up to 150 dwellings (Use Class C3), including affordable dwellings, and associated landscaping, public open space and infrastructure works."

1.3 Additional details in relation to, and in support of, the description of the proposed development can be found within the Design and Access Statement, prepared by ECE Architecture, which also accompanies the application submission.

Taylor Wimpey

1.4 Taylor Wimpey builds approximately 15,000 homes each year across the UK. Taylor Wimpey South East builds around 600 homes per year in Kent and East Sussex and has a long and successful track record within these regions. Taylor Wimpey builds sustainable homes and creates high quality places of distinctive character with open spaces and biodiversity improvements. Taylor Wimpey is building in the following locations close to the site:

- 539 homes at 'Waterside', Castle Hill, Ebbsfleet (Ebbsfleet Development Corporation) – 7km/4.5 miles to the north west of the site.
- 763 homes at 'Knights Reach', Watling Street, Stone, Dartford (Dartford Borough Council) – 9.5km/6 miles to the north west of the site.
- 91 homes at 'Capstone Oaks', East Hill, Chatham (Medway Council) – 12.5km/8 miles to the east of the site.
- 261 homes at 'Oakapple Place', Barming, Maidstone (Maidstone Borough Council) – 14km/8.5 miles to the south east of the site.

Accompanying Documentation

1.5 This application is supported by a series of plans and a full suite of technical reports that should be read alongside this Planning Statement. A full list of documents which accompany the application are provided in **Appendix 2**.

Structure of Statement

- 1.6 This Planning Statement describes the proposals, related key material considerations in determining the application, and the economic, social and environmental benefits which will be delivered.
- 1.7 The remainder of this Statement is structured as follows:
 - **Section 2:** Description of the Site and its surroundings, planning designations and relevant planning history;
 - **Section 3:** Provides details of the proposed development;
 - **Section 4:** Sets out the relevant planning policy context of the adopted and emerging Development Plan and the National Planning Policy Framework and other material considerations;
 - **Section 5:** Provides a planning assessment of the proposal against a number of relevant considerations;
 - **Section 6:** Provides details of the Planning Obligations and Affordable Housing Statement
 - **Section 7:** Sets out a summary and conclusions.

2. Site Context and Planning History

Site Description and Surroundings

- 2.1 The site covers approximately 7.41ha on the eastern edge of Hook Green, Meopham. It comprises an irregular shaped agricultural field currently used for arable farming with Churchway Wood on the western boundary, creating a partial planted break in the site. The site falls from the southeast to north, with the lowest point on site in the north western corner.
- 2.2 The site is bounded by Norwood Lane to the east, Camer Road/Green Lane to the south, and the built-up area of Meopham to the west and north. Trees and hedges line Green Lane and Norwood Lane. There is a public right of way traversing the site which connects the corner of Camer Road/Norwood Lane with Tradescant Drive. In close proximity to the site is Camer Park Country Park, located to the south of Camer Road.
- 2.3 Meopham (including Hook Green) is a village inset from the Metropolitan Green Belt identified as a large village in the second tier of the settlement hierarchy, suitable for expansion and accommodating some growth in the Local Plan. The A227 serves as a primary route through Meopham, facilitating vehicular, cycle, and pedestrian movement.
- 2.4 There is good connectivity to the wider Towns, Villages and Cities, with several bus services running through Meopham along the A227. The nearest bus stop to the site is located to the south of the public right of way where it meets the A227, which provides services to Sevenoaks, Rochester, Wrotham, Vigo Village and Wilmington.
- 2.5 Meopham train station is located to the northern most end of Meopham, a 15 minute walk from the site and provides direct connections to London in 30 minutes.
- 2.6 Meopham offers various local facilities, including primary and secondary schools, Leisure Centre, Library, Medical Centre, Village Hall, Recreation Ground, and Country Park. There are two Local Centres within Hook Green (to the north and south) as designated by Policy CS08.

Designations

- 2.7 A review of the adopted Policies Map (see figure 1 below) identifies the site is washed over by the Green Belt (Policy CS02) and adjacent to the settlement boundary i.e. Rural Settlements inset from Green Belt (Policy CS02) for Hook Green, Meopham .
- 2.8 Whilst not within the site, the Kent Downs National Landscape lies to the south eastern boundary (Policy CS12).



Figure 1: Adopted Policies Map (Core Strategy, 2014)

- 2.9 The EA Flood Map for Planning indicates that the site is located totally within Flood Zone 1 (low flood risk from fluvial and tidal sources). The EA's Flood Map for Surface Water indicates that this site is at 'very low' surface water risk which corresponds with an annual probability of flooding that is less than 1%. There is 'low' risk of surface water flooding isolated in the north corner parallel to Tradescant Drive and pooling along Norwood Lane.
- 2.10 There are no statutory or non-statutory nature conservation designations within or immediately adjacent to the site. The nearest ecological designation is Shorne and Ashenbank Woods (SSSI) located approximately 2.7km northeast of the site.
- 2.11 Similarly, whilst there are no heritage assets within the site, there are several listed buildings within the surrounding area. These include the Grade II* Church of St Mildred, the Grade II Northwood Farmhouse, Bailiff's House, Camer House, and the Building Approximately 30 Metres to West of Camer House. The closest listed building (Bailiffs House) lies just over 75m from the Site boundary.
- 2.12 Hook Green Conservation Area is located to the north west of the site, with the existing built up area of Hook Green acting as an intervening feature. The Street, Meopham Conservation Area lies to the south west of the site currently separated by open fields.
- 2.13 There are no TPO trees within or adjacent to the site's boundaries, as confirmed with the Council's Planning Admin team.

Planning History

- 2.14 A review of the Council's planning application search does not identify any planning history for the application site.

2.15 However, the site has been promoted through the emerging Local Plan process whereby the stage 2 Regulation 18 Local Plan document published for consultation in 2020, identified the site as a draft development allocation (ref: GB36) for 150 homes.

Pre-application Engagement

2.16 Prior to formal submission of this application, the Applicant requested preapplication advice from the Council in May 2025. An accompanied site visit took place on the 10th July 2025 with Ethan Bonthron (Senior Planning Officer) and Siân Morley (Senior Planning Policy Officer) in attendance. No formal response has been received.

2.17 Furthermore, separate pre-application engagement with Kent County Council as the Highway Authority has been undertaken by i-Transport. Key matters raised and agreed through the pre-application process were as follows:

- The all mode access position at Green Lane is accepted in principle – there should be a consideration of the extension of a 30mph speed limit (Transport Assessment sets out the length of the extension to the 30mph limit along Norwood Lane and Green Lane);
- KCC supported the proposed vision based approach and proposed scenarios; and
- KCC commented on the proposed emergency access arrangements and active travel routes and these have been refined in light of feedback.

2.18 The proposed development draws on the new vision-based approach set out in the NPPF. A vision-based approach to transport planning is the setting of outcomes for a development which achieves well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (typically on the highway network and highway capacity). KCC has agreed to this approach and the subsequent Transport Assessment prepared by i-Transport details the appropriate vision for the site.

2.19 The Applicant's Landscape consultant sought to engage with the Kent Downs National Landscape, who advised that they do not have capacity to offer a pre-application advice service.

2.20 In addition, the project team delivered a pre-application engagement programme which is summarised in the Statement of Community Engagement ('SCE') submitted as part of this application. An online public consultation ran for two weeks before submission of the application with over 1,600 local households and businesses in Meopham being notified by leaflet. Feedback received during the engagement programme and consultation period is detailed in the submitted SCE and has been taken into account.

2.21 The engagement undertaken has enabled the project team to build a good understanding of the local context and to raise awareness of the proposals.

2.22 In summary, the Applicant has sought to engage with appropriate stakeholders at the appropriate time and has taken on board comments where they have been received.

3. The Proposed Development

3.1 The description of development, as indicated on the application form, is as follows:

“Outline application with all matters reserved (except access) for a development of up to 150 dwellings (Use Class C3), including affordable dwellings, and associated landscaping, public open space and infrastructure works.”

3.2 To summarise, this application seeks outline planning permission to deliver the following:

- Up to 150 new dwellings.
- A mix of market and affordable homes, including provision of 50% affordable homes.
- Vehicular access from Green Lane (with access into the site proposed in detail).
- Over 1.6ha of public open space, including new areas for children to play.
- Retained alignment of existing Public Right of Way, setting it alongside a tree-lined street and connected green spaces;
- Improved footway and crossing on Green Lane towards Camer Park Country Park.
- Enhanced pedestrian connectivity to and through the site, including safe connections through to Norwood Lane to the north.
- Enhancement of existing hedgerows around the site boundary to support existing habitats.
- Planting of new hedgerows and landscaping throughout the site.
- A sustainable drainage system.
- Associated infrastructure.

3.3 The application is submitted in outline, with all matters (apart from access into the site) reserved for future consideration.

3.4 Additional details in relation to, and in support of the proposed development can be found within the Design and Access Statement (prepared by ECE Architecture), which also accompanies the application submission.

4. Planning Policy

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

“Regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

4.2 The relevant Development Plan at the time of submission of the planning application consists of the following:

- Local Plan Core Strategy and Local Plan Policies Map (Adopted September 2014)
- Local Plan First Review (1994) – Saved Policies

4.3 Other material considerations include the following:

- National Planning Policy Framework (NPPF) 2024
- National Planning Practice Guidance (NPPG)
- Residential Layout Guidelines SPG2 – Adopted February 1996 – amended June 2020
- Design for Gravesham – Design Code SPD – Adopted May 2024
- Emerging Local Plan
- Five Year Housing Land Supply

The Development Plan

Local Plan Core Strategy and Local Plan Policies Map (2014)

4.4 The Gravesham Local Plan Core Strategy was adopted in September 2014 and forms the main development plan document guiding development over the period up to 2028.

4.5 The policies of relevance to the proposals are set out below:

- Policy CS01 – Sustainable Development
- Policy CS02 – Scale and Distribution of Development
- Policy CS11 – Transport
- Policy CS12 – Green Infrastructure
- Policy CS13 – Green Space, Sport and Recreation

- Policy CS14 – Housing Type and Size
- Policy CS15 – Housing Density
- Policy CS16 – Affordable Housing
- Policy CS18 – Climate Change
- Policy CS19 – Development and Design Principles
- Policy CS20 – Heritage and the Historic Environment

Gravesham Local Plan First Review (1994)- Saved Policies

4.6 The Gravesham Local Plan First Review was adopted in 1994, where many of its policies have been saved in September 2007. Appendix 1 of the Core Strategy (2014) sets out the saved policies from the First Review.

4.7 The policies of relevance to the proposals are set out below:

- Policy H6 (iii) – Provision to Meet Special Housing Needs
- Policy TC2 – Listed Buildings
- Policy TC7 – Other Archaeological Sites
- Policy LT6 – Additional Open Space in New Housing Development
- Policy T1 – Impact of Development on the Highway Network
- Policy T4 – Development outside the Built-Up Area
- Policy T5 – New Accesses onto Highway Network
- Policy T9 – Housing Estate Layout
- Policy P3 – Vehicle Parking Standards

Material Considerations

National Planning Policy Framework (“NPPF”) (2024)

4.8 The revised National Planning Policy Framework (the ‘Framework’) was published in December 2024. The Framework covers a range of issues to promote sustainable growth and protect the environment. The following paragraphs of the Framework are considered of particular relevance in the determination of this application.

4.9 **Paragraph 7** of the Framework sets out that the purpose of the planning system is to contribute to the achievement of sustainable development.

4.10 At **paragraph 8**, indicates that achieving sustainable development concerns three overarching objectives (economic, social and environmental), which are interdependent and mutually supporting.

4.11 **Paragraph 10** states that at the heart of the framework is a presumption in favour of sustainable development.

4.12 **Paragraph 11** states that *“Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:*

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance 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.”*

4.13 **Paragraph 61** states to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

4.14 **Paragraph 155** sets out 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 below.”*

4.15 **Paragraph 156** notes that *“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.

4.16 **Paragraph 157** goes on to state that *“Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.”*

National Planning Practice Guidance (“NPPG”)

4.17 The National Planning Practice Guidance ('NPPG') was launched by DCLG on 6th March 2014 as a web-based resource to bring together planning practice guidance for England in an accessible and usable way.

4.18 The NPPG sets out guidance on a wide range of topics and due regard has been paid to these as appropriate in the development of the proposals.

Supplementary Planning Documents (“SPD”)

4.19 The following supplementary planning documents and guidance are considered relevant to the proposed development and have been considered as part of the planning application:

- Residential Layout Guidelines SPG2 (June 2020)
- Design for Gravesham- Design Code SPD (May 2024)

4.20 GBC have also adopted the following relevant documents produced by Kent County Council as supplementary planning guidance:

- Kent Design Guide
- SPG1: Landscape Character (July 2006)
- SPG2: Biodiversity Conservation (July 2006)
- Kent County Council Parking Standards (January 2025)

Emerging Planning Policy

4.21 A review of the Gravesham Local Plan commenced some time ago, and the council has recognised that exceptional circumstances exist to justify a review of Green Belt boundaries, in order to meet its identified housing needs.

4.22 A stage 2 Regulation 18 Local Plan document was published for consultation in 2020, which identified the site as a draft development allocation (ref: GB36) for 150 homes. It also reconfirmed that Meopham (including Hook Green) as a large village in the second tier of the settlement hierarchy, suitable for expansion and accommodating some growth.

4.23 Following a review on the Regulation 18 consultation, it is considered that the following policies would be relevant to the application site:

- Policy INF2 – Transport Design Principles
- Policy INF3 – Understanding and Mitigating Transport Impacts
- Policy INF4 – New Accesses and Junctions
- Policy INF7 – Renewable and Low Carbon Energy
- Policy GI2 – Open Space Provision
- Policy GI4 – Trees, Hedgerows and Woodland
- Policy GI5 – Landscape Character
- Policy GI6 – Biodiversity
- Policy FW1 – Managing Water Quality
- Policy FW2 – Managing water supply in new development
- Policy FW3 – Managing Flood Risk
- Policy FW4 – Managing Waste Water Drainage
- Policy FW5 – Managing Surface Water Drainage
- Policy RES1 – Self/Custom Build
- Policy RES2 – Residential Space Standards
- Policy RES6 – Residential Intensification through New Build
- Policy AM1 – Air Quality
- Policy AM2 – Contaminated Land
- Policy AM3 – Light Pollution

- Policy AM4 – Sunlight and Daylight within New Development
- Policy AM5 – Noise and Vibration

4.24 It is understood that the Regulation 19 version of the Local Plan is due to be published in Autumn 2025 following some delay since the latest Local Development Scheme (March 2025) advised the following dates:

- Regulation 19 Consultation – July 2025
- Submission to Secretary of State – December 2025
- Examination – July 2026
- Adoption – December 2026.

4.25 As the Pre-submission consultation has yet to take place, limited weight is attributed to the emerging Local Plan at the time of writing.

Five Year Housing Land Supply

4.26 The Council's latest 5 Year Housing Land Supply Statement was updated in February 2025 to reflect the December 2024 NPPF.

4.27 The Statement confirms that Gravesham is unable to demonstrate a deliverable supply of sites for housing against its housing need over the next five years from 2024 to 2029. At present, the Council can only demonstrate a 3.0 year supply.

4.28 The Statement acknowledges that:

“Where the Council is unable to demonstrate a five-year supply of deliverable housing sites, the presumption in favour of sustainable development, as set out in paragraph 11 of the NPPF, comes into play. This requires the Council to consider planning applications for housing against paragraph 11 (d) of the NPPF and undertake a balancing exercise to ensure that the correct weight is attached to the shortfall in meeting the five-year housing land supply requirement and the provisions within the NPPF.”

4.29 To ensure choice and competition in the market for land, the NPPF requires local planning authorities to add an additional 5% buffer to their housing need figure over the five-year period. For local authorities where there has been significant under-delivery in the last 3 years, this buffer is to be increased to 20% to improve the prospect of achieving the planned supply.

4.30 The latest published Housing Delivery Test¹ for Gravesham shows that against a need of 1,789 dwellings, 1,056 dwellings were delivered in the Borough over the period 2020-2023 which results in a Housing Delivery Test 2023 measurement of 59%. As a

¹ <https://www.gov.uk/government/collections/housing-delivery-test> (Published in December 2024 and provides the Housing Delivery Test measurement for 2023)

result, a 20% buffer needs to be applied to Gravesham's housing need figure, and the presumption in favour of sustainable development is engaged.

- 4.31 Gravesham's five year supply local housing need figure with 20% buffer applied is 4,032 dwellings. There is a supply shortfall of 1,603 dwellings over the next 5 years against Gravesham's local housing need figure with a 20% buffer applied.
- 4.32 This position has been confirmed since in the Council's Statement of Case (dated March 2025) for appeal ref APP/K2230/V/25/3360355 at Northfleet Harbourside - Land Surrounding Ebbsfleet United Football Club for a mixed-use redevelopment including up to 3,500 residential units. In addition, the Council have accepted that in order to maintain the supply of housing, the presumption in favour of sustainable development applies.

5. Planning Assessment

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 This section of the planning statement assesses the proposed development against the adopted development Plan, read as a whole and takes account of relevant material considerations, including the National Planning Policy Framework.

Principle of Development

- 5.3 The Adopted Policies Map illustrates that the site is located within the Green Belt , adjacent to Hook Green, Meopham which is a village inset from the Green Belt. The principle of housing development is generally not supported by the Development Plan; however there are material considerations which indicate otherwise.
- 5.4 Policy CS02 of the Gravesham Local Plan Core Strategy 2014 states that "*The extent of the Green Belt is defined on the Policies Map. A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt.*"
- 5.5 The Core Strategy recognises that, as development opportunities within the existing urban area and settlements inset from the Green Belt become more limited, some development may be required on land in the rural area and Green Belt to meet housing needs.

Housing Land Supply and the Presumption in Favour of Sustainable Development

- 5.6 The Core Strategy makes provision for 6,170 homes over the plan period (2011-2028), equating to 363 dpa. However, as the Core Strategy was adopted in September 2014, and is therefore over five years old, it is considered out of date with regard to local housing need, in accordance with footnote 41 of the NPPF. Therefore, Gravesham Borough Council is obliged to assess its 5 year housing land supply against local housing need calculated using the standard method.
- 5.7 The current minimum housing requirement arising from the standard methodology for Gravesham is 676 dpa, which is significantly higher than the Adopted Core Strategy makes provision for.
- 5.8 Paragraph 78 of the NPPF sets out that local planning authorities should 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.
- 5.9 In February 2025, the Borough Council published a Five-Year Land Supply Statement for the period 2024-2029, using the latest calculation of local housing need which concluded that the council can only demonstrate a housing land supply of c.3 years.

5.10 On the basis of the identified shortfall in the Council's housing land supply, the most important policies for determining the application, should be considered to be out of date (as set out in footnote 8, Paragraph 11 of the NPPF).

5.11 Accordingly, the NPPF's tilted balance applies, with paragraph 11(d) stating that planning permission should 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."*

5.12 Taking the first limb of paragraph 11d; site assessment work has concluded that the site is unaffected by NPPF footnote 7 policies which would provide a strong reason for refusal. This is detailed in the supporting LVIA at Table 8.4. Therefore the proposed development should be considered within the context of criterion (ii) of paragraph 11(d). The presumption in favour of sustainable development requires, the council to weigh the adverse impacts of granting permission against the benefits when assessed against the NPPF taken as a whole.

Sustainable Location

5.13 The proposal site is located on land adjacent to the existing settlement boundary of Hook Green, Meopham, which is identified in the adopted Local Plan as a Second Tier Settlement. Hook Green's position as a Second Tier Settlement, suitable for expansion and accommodating some growth, was also reconfirmed in the stage 2 Regulation 18 Local Plan document, published for consultation in 2020.

5.14 The council has indicated that Meopham's position in the settlement hierarchy is likely to remain in the emerging Local Plan. The Settlement Hierarchy Background Paper (October 2020) consulted on during Regulation 18 Stage 2, noted in respect of that:

*"Meopham Green is a long settlement located immediately to the south of Hook Green. Given the proximity between the two settlements (1200m from the GP surgery in Meopham Green to the local centre at Camer Parade), **the services available in each settlement are accessible to the residents of both settlements; on foot and by cycling for some residents or by bus (frequent service)**. Hook Green offers a good range of retail services, a primary school and a railway station, which provides links to Medway Town and London. These compliment the services found in Meopham Green. **Given their proximity and the range of services available, the two settlements are able to function together to provide the full range of services to meet the day-to-day needs of the residents in both settlements** [our emphasis]".*

5.15 The stage 2 Regulation 18 document identified the site west of Norwood Lane as a draft development allocation (ref. GB36) for 150 homes indicating that the council continues to consider Meopham, and indeed this particular site, a sustainable location to accommodate additional residential development.

5.16 Meopham benefits from a range of services and amenities(see figure 4.4 of the Transport Assessment) including primary and secondary education provision, village hall, library, tennis club, leisure centre, nursery, medical centre, and convenience shop that can be accessed via the existing active travel networks as established in the submitted Transport Assessment.

5.17 Hook Green has two local centres, as identified on the adopted Policies Map, within walking distance of the site. To the west of the site, and along all of the principal connections from the site, including Green Lane, Tradescant Drive, Denesway, and Wrotham Road, footways are provided to one or both sides of the carriageway. Pedestrian crossing points and central refuge crossing points on the A227 Wrotham Road allow connectivity and permeability for pedestrians across Meopham.

5.18 Although there is no designated cycle infrastructure on the immediate road network, local roads are primarily subject to a 30mph speed limit and relatively level gradient which is conducive to on-street cycling – particularly via Norwood Lane, which also has a low traffic flow.

5.19 The A227 serves as a primary route through Meopham, facilitating vehicular, cycle, and pedestrian movement. The nearest bus stop to the site The nearest bus stops to the site are located on A227 Wrotham Road. The Huntingfield Road bus stop is approximately 350m from the proposed access on Green Lane, and the Denesway bus stop is approximately 300m from the site via PRoW 0169/NS250/1. They are recognisable by a flagpole with timetable information and shelters, and are serviced by 11 bus routes, 10 of which are local School Services. An additional service (416) passes along Green Lane and the site, albeit no stops are available on this road in the vicinity of the site. Table 4.1 of the Transport Assessment provides a summary of public service 308 and 416, and figure 4.2 shows routes 308 and 416 in context with the site location, bus stops on Wrotham Road, local rail services and employment/retail areas in Gravesend and Rochester. It demonstrates how the services available offer real opportunities for residents to travel via bus or rail.

5.20 There are two rail station near the site, Meopham and Sole Street, which both have services to key destinations across the southeast and London. While Sole Street is closest to the site, at around 900m from the site it is accessed via rural roads with no pedestrian facilities. Therefore, Meopham station is likely to be the most utilised, accessed along pedestrian footways/residential routes and has a greater number of frequent services and is around 1km from the site. Meopham railway station provides a frequent and sustainable option for residents travelling for both employment and leisure uses. Onward rail links are available from larger stations such as London Victoria and Gillingham.

5.21 As such, the proposed development is well-situated to link to existing pedestrian and cycling networks, and public transport services, and as such presents realistic alternative travel mode choices to the private car for day-to-day trips.

5.22 This application proposes improvements to existing pedestrian and cycle links. This includes an additional connection through the site between Norwood Lane and Green Lane to provide pedestrian/cycle/emergency access , which will also provide for internal routing towards Camer Park Country Park. Similarly, the public right of way

within the site will be retained on its alignment with surface enhancements possible, to increase its usability by all. The development would also deliver improved footpath and crossing provision at Green Lane close to the site access. These all serve to make the site even more accessible and thus improve overall sustainable transport links in Hook Green, Meopham.

5.23 Furthermore, considering this, and within the context of paragraph 11(d), the applicant contends that the proposed development demonstrates sustainable development by virtue of its location and the services and facilities that Hook Green, Meopham, alongside Meopham Green, offers.

The Delivery of Homes to Meet Local Needs

5.24 The development of this site will promote a strong, vibrant and healthy community in Hook Green, Meopham by providing a supply of housing to meet the needs of present and future generations.

5.25 In addition, this development would help to support Hook Green, Meopham as a thriving community. The proposed development at this site will make a positive contribution towards meeting local housing needs, improving the affordability of housing and ensuring that local households can meet their needs within Meopham. The site is not subject to any over-riding constraints that would inhibit the timely delivery of new dwellings at this location.

Affordable Housing Provision

5.26 Adopted policy CS16 (affordable housing) of the Core Strategy requires the provision of 35% in the rural area on sites of 15 dwellings or more. However, the site is located within the Green Belt (discussed in detail further below), and therefore to satisfy the 'Golden Rules' as set out in paragraphs 156-157 of the Framework (2024), the proposed development of up to 150 no. dwellings will provide 50% affordable housing, equivalent to up to 75 dwellings.

5.27 The proposed affordable housing will be integrated into the overall development, and there shall be no difference in external appearance when compared to the market housing proposed.

5.28 The proposal scheme shall provide a mixture of affordable housing tenures and dwelling types including affordable homes to rent and affordable home ownership. The applicant will engage with the Council to ensure the nature of provision is in broad accordance with Local Plan requirements, subject to local market considerations as identified by a registered provider.

Benefits

5.29 The provision of new housing brings significant benefits and particularly so in areas with issues concerning under-delivery. If new development were facilitated, this would also provide wider socio-economic benefits. These include enhancements to the vitality and viability of local services, and by extension the quality of life that existing and future residents will experience. Similarly, the proposals will result in the creation of jobs in the construction industry during the construction period with associated benefits to local facilities with increased patronage.

5.30 The development will deliver 50% affordable housing. This is a significant benefit in general, but the benefits are amplified in an area where affordability pressures are so profound.

5.31 The scheme will also deliver wider benefits, including:

- An embedded landscape-led approach, retaining and enhancing existing landscape features to create a connected network of green spaces;
- Over 1.6ha of public open space, including new areas for children to play, to benefit both new and existing residents;
- Biodiversity enhancements including tree planting, SUDs features, ecology and wildlife corridors, along with delivery of at least 10% net gain; and
- A connected series of footpaths to promote active travel and healthy lifestyles, with easy access to existing and future public transport connections.

5.32 Lastly, a full package of financial contributions will be secured through payment of contributions secured through the Section 106 Agreement where appropriate and subject to meeting the relevant tests.

Green Belt

5.33 The Core Strategy at supporting paragraph 2.4.8 acknowledges that as development opportunities within the existing urban area and settlements inset from the Green Belt become more limited, some development may be required on land in the rural area before the end of the plan period to meet the Borough's housing needs and sustain rural communities. The Green Belt has therefore been identified as a broad location for future growth and its boundaries will be subject to a review.

5.34 Since adoption of the Gravesham Local Plan Core Strategy in 2014, the level of housing need in Gravesham has increased significantly from at least 438 dwellings per year 2024/2025 – 2027/2028 set out in Policy CS02, to 672 dwellings per annum with the new standard figure method in the revised version of the NPPF (December 2024). A review of the Gravesham Local Plan commenced some time ago, and the council has again recognised that exceptional circumstances exist to justify a review of Green Belt boundaries, in order to meet its identified housing needs. Such review resulted in the proposed allocation of the site in the stage 2 Regulation 18 Local Plan document for 150 homes.

5.35 Paragraph 145 of the NPPF makes clear that Green Belt boundaries should only be altered in exceptional circumstances and that strategic policies should establish the need for any changes to the Green Belt boundaries. Exceptional circumstances are defined in paragraph 146 as including where an authority cannot meet its identified need for home through other means.

5.36 Since the site's proposed draft allocation in 2020, the revised NPPF introduced a new sub-type of Green Belt which is referred to as grey belt land and 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 relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'

5.37 Supporting guidance on the methodology and criteria to be used when undertaking Green Belt assessments and identifying grey belt land was provided in a PPG Update on Green Belt Assessment (February 2025).

5.38 A Green and Grey belt appraisal of the site has been undertaken (included in the submitted LVIA report) following the approach and assessment criteria set out in the Planning Practice Guidance on Green Belt Assessment (February 2025). This concluded that the site does not make a strong contribution to Green Belt purposes a, b or d. Furthermore the Site is not subject to any of the policies relating to the areas or assets in footnote 7 of the NPPF, such as Habitats Sites, Local Green Space, AONB, National Park, irreplaceable habitats, designated heritage assets or areas at risk of flooding or coastal change; (other than Green Belt) which would provide a strong reason for refusing or restricting development. The site therefore meets the definition of grey belt land and would satisfy all criteria of paragraph 155 of the NPPF. Firstly, the Site meets criterion a as it should be considered Grey Belt according to the definition included in the NPPF. Furthermore, the appraisal concluded that the development would not affect the strategic functioning of the Green Belt across the Borough due to its small size and its proximity to the existing settlement of Hook Green.

5.39 In regard to criterion b, the Council is currently unable to prove a five-year housing land supply. The latest published Housing Delivery Test² for Gravesham shows that against a need of 1,789 dwellings, 1,056 dwellings were delivered in the Borough which results in a Housing Delivery Test 2023 measurement of 59% (lower than 75%). It can therefore be considered that Gravesham Borough Council has a demonstrable unmet need for housing. The Site is sustainably located (as set out in the 'sustainable location' section of this Planning Statement above), therefore criterion c has been met.

5.40 The proposed development will deliver on the 'Golden Rules' in accordance with paragraphs 156 and 157 of the NPPF (December 2024) for appropriate development in the Green Belt which will include 50% affordable housing and over 1.6ha of publicly accessible green spaces. Local infrastructure improvements such as the extension of the pedestrian footway on the northern side of Green Lane between the existing footway and the site access, new pedestrian crossing point on Green Lane at the site access, improved pedestrian crossing facilities at the A227 Wrotham Road / Green Lane junction and new crossing on the A227 Wrotham Road south of the junction will also be provided with a pedestrian island refuge are also included. In addition, the main vehicular access will provide footways for pedestrian connectivity and the EVA located to the north of the site will serve as a pedestrian and cycle access for residents to make their journeys north via quieter roads For this reason, the proposed development would not be inappropriate development.

² <https://www.gov.uk/government/collections/housing-delivery-test> (Published in December 2024 and provides the Housing Delivery Test measurement for 2023)

5.41 The applicant strongly contends that the site constitutes Grey Belt, however, should the Council conclude that the site is not Grey Belt and the development proposal constitutes ‘inappropriate development’ in the Green Belt, then a judgement for ‘Very Special Circumstances’ may be made as per paragraph 143 of the NPPF.

5.42 The proposed benefits of the scheme, and ‘very special circumstances’ should the proposed development scheme not be found appropriate as set out in paragraph 155 of the NPPF, to justify development at this location have been advanced and discussed in detail in proceeding sections and can be summarised as follows:

- Contribution towards the housing requirements and economic and social needs of the District in light of a significant housing supply shortfall;
- Contributing towards the unmet affordable housing need with Gravesham;
- Contributing towards the provision of a wider housing choice;
- Making an efficient use of existing primary services and accessibility infrastructure at a Second Tier Settlement;
- Providing additional ecological gains.
- Improved connections and link to Camer Country Park

5.43 The harms would include inappropriate development in the Green Belt (should the council determine it is not Grey Belt) and conflict with the Local Plan in relation to the site’s countryside location.

5.44 The benefits set out above, amount to very special circumstances, which in our view clearly outweigh the development harms in accordance with Local Plan policy and paragraph 153 of the NPPF. The proposals therefore accord with national policy.

Technical Considerations

Design

5.45 This outline application has been informed by a range of technical work and while detailed design remains to be considered at reserved matters stage, an illustrative masterplan is submitted in support of the application. Details on the design evolution of the proposals are set out in the accompanying Design and Access Statement (prepared by ECE Architecture). In summary the design concept has been determined by the desire to create a high-quality landscape-led scheme that will create a well-connected, sustainable neighbourhood.

5.46 A Land Use and Access Parameters plan is submitted for approval and the Illustrative Masterplan has been developed as a landscape-led scheme which responds to the opportunities and constraints on the site.

5.47 The existing landscape and green infrastructure have heavily influenced the scheme, and the outcome proposes a sustainable and characterful place. Policy CS13 sets out that provision should be made on site for green space. Saved Local Plan policy LT6 sets

out that new housing development will be expected to make provision for open space and play space appropriate to the scale of development and type of housing proposed, having regard to the provision of and proximity to existing open space in the locality. The proposed development will provide over 1.6 ha of public open space as part of the scheme, including an Local Equipped Area of Play (LEAP), community growing spaces (including an orchard), and areas of amenity grass for informal recreation.

5.48 Key features that have informed the scheme are as follows:

- New primary vehicular access proposed to serve the development efficiently and safely (policy T5);
- 3.7m-wide pedestrian and cycle route also serving as emergency access (policy T5);
- Retained PROW integrated alongside a tree-lined street and connected green spaces (policies CS19, LT6);
- Landscaped area where the PROW exits the site to Tradescant Drive providing a natural transition to the PROW and enhancing the arrival experience (policies CS19, LT6);
- Drainage basins designed to capture surface water and manage flows across the site (policy CS18);
- New structural planting introduced along Norwood Lane to provide screening (policies CS13 and CS19);
- Open space designed around the heart of the site, with development offset from woodland (policies CS13, CS19, LT6);
- Centrally located play space supported by informal recreational areas at site edges (policy LT6);
- Dwellings positioned to front onto green spaces throughout the development (policy CS19);
- Protected view corridor maintained to preserve key long-range views to local landmarks (policy TC2);
- New footpath connecting the site to the existing local footpath network (policy T5);
- Pedestrian link proposed to provide access to Camer Country Park (policy T5).

5.49 In addition to the above, the site has been divided into two character areas as a response to the character analysis carried out. These areas architectural style have been informed by the local context, local vernacular and local heritage, considering key details and characteristics as set out in policy CS19. The Rural Edge follows around the southern and eastern edge of the site to provide a soft transition to the countryside. . The Central Core includes development within the centre of the site and bordering

onto existing development to the western boundary. The area is informed by the density of the surrounding area.

5.50 The application is submitted in outline with all matters reserved except access. Details of appearance, layout, scale and landscaping to be considered at reserved matters stage, however the development will accord with the principles of high-quality design and best practice in accordance with Local Plan Policies CS19 and H6, Residential Layout Guidelines SPG2 (June 2020), Design for Gravesham- Design Code SPD (May 2024), Kent Design Guide, National Design Guide, and the Framework to create a development that is both varied, and yet sympathetic to its environment. Similarly, the detailed mix and density of the proposed development would be secured through future reserved matters stages and in accordance with policies CS14 and CS15 of the Local Plan.

5.51 As demonstrated above, and detailed within the supporting Design and Access Statement, the proposed development will achieve a well-designed place that seeks to positively respond to the surrounding area and the local character. Detailed design will be set out at reserved matters stages.

Landscape and Visual Impacts

5.52 The application is accompanied by a Landscape and Visual Impact and Green Belt Appraisal prepared by Turley Landscape which provides full details of the landscape context and visual analysis.

5.53 The LVIA confirms that the Site is not covered by either a statutory landscape designation nor a local landscape designation. However, part of the southern boundary of the Site adjoins the northern boundary of the Kent Downs National Landscape and the Site is considered to lie within part of its setting.

5.54 The baseline appraisal identified that the Site is located within the Meopham Downs Landscape Character Area, an area of Moderate sensitivity as identified within the Gravesham Borough Council Landscape Character Assessment. Key characteristics of this area include its undulating topography, mixture of arable and pasture farmland, irregular shaped fields and presence of settlements located along the A227 which passes through the centre of the area.

5.55 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.

5.56 The landscape value and sensitivity of the Site and adjoining arable landscape to the north-east and south-west (including the Meopham Downs LCA) was identified as Medium. The area was assessed against criteria to determine if it constitutes a ‘valued landscape’ under NPPF para 187a. This concluded that, whilst the Site demonstrates some positive attributes, these are not present to such an extent as to warrant consideration of the Site as a Valued Landscape. The National Landscape to the south of the Site was identified as an area of High landscape value and High sensitivity.

5.57 There are no formally protected local/strategic views or identified viewpoints covering the Site. However, a key view was identified from Camer Road (at the junction with Camer Park Road) which extends across the Site towards the tower of Nurstead Church. There are also views across the Site from Public footpath 0169/NS250/1 which crosses the Site and intermittent views from Green Lane/Camer Road and Norwood Lane which adjoin the Site public footpath 0169/NS192/8 to the north of the Site.

5.58 The Site lies within the Green Belt and adjoins the settlement of Hook Green which is outside the Green Belt. An assessment of the contribution of the Site to the grey belt was undertaken (in accordance with the approach and criteria set out in the 2025 PPG on Green Belt Assessment). This concluded that the Site meets the definition of grey belt land.

5.59 The landscape and visual analysis has informed the evolution of the design principles and landscape strategy for the Site. 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 is proposed. The existing footpath across the Site would 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 would incorporate substantial planting, which would soften views of the Proposed Development from the approach routes to Hook Green from the east.

5.60 Following the introduction of the Proposed Development, there would be some localised adverse landscape effects on the Site and immediate surrounding landscape (as there would be for any development in areas of undeveloped landscape). This is due to the reduction in open landscape and the extension of the settlement edge to Norwood Lane. Due to the containment provided by the existing surrounding landscape structure, there would be little awareness of change in the more sensitive West Kent Downs character area to the south-east and the Scenic Beauty and Special Qualities of the National Landscape would be preserved. There would also remain clear separation between areas of development within Hook Green and the surrounding settlements of Sole Street and Meopham.

5.61 There would also be some adverse effects experienced by visual receptors in the immediate context to the Site. However, the extent of these adverse effects would again be limited in the wider landscape. The establishment of the proposed Landscape Strategy would provide containment to the Site and screen visibility from the surrounding, more open, countryside, including the National Landscape to the south-east.

5.62 There would be open views of new housing experienced by users of the public right of way which crosses the Site and from private residential properties which overlook the Site. There would also be intermittent views of the development from the surrounding roads (Norwood Lane, Green Land and Camer Road. The Proposed Development would have an urbanising influence on the appearance of these views but over time proposed planting would soften and mitigate these effects. The positioning of the development areas to retain an open view corridor would ensure long views across the Site to the tower of Nurstead church in the north and the National Landscape in the south are preserved.

5.63 In conclusion, the Site is an area with relatively few landscape or visual constraints. It lies within the Green Belt but meets the definition of grey belt land. The Proposed Development would change an intensively farmed piece of open land, into an area of residential development. For reasons described in this appraisal, it is considered that the Site could form a logical extension to the settlement boundary of Hook Green. The Proposed Development would be integrated with its landscape setting and a Landscape Strategy has been developed which incorporates measures to mitigate potential adverse landscape and visual effects and deliver enhancements (including improved access to the National Landscape). Overall, beyond the direct impacts to the Site itself, the landscape and visual impacts of the proposals would be limited and localised and there would be very little change to the character or appearance of the wider surrounding area (including the National Landscape).

5.64 It is considered that the proposed scheme conserves the overall landscape character, especially the setting on the Kent Downs National Landscape and as such it accords with policy CS12 of the Local Plan and the NPPF.

Ecology and Biodiversity

5.65 Policy CS12 of the Local Plan sets out 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. Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

5.66 Submitted with the application is an Ecological Appraisal prepared by Aspect Ecology. The report confirms that 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.

5.67 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. Indeed, 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. Where it has not been practicable to avoid loss of habitats (e.g. circa 15m hedgerow

H2), new habitat creation is proposed to offset losses, in conjunction with the generous landscape proposals.

- 5.68 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.
- 5.69 In conclusion, the proposals have sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, the proposals will not result in significant harm to biodiversity.
- 5.70 A BNG Assessment is also submitted alongside the application prepared by Aspect Ecology. On the basis of the considerations and proposals set out, the Statutory Metric calculator indicates a net habitat biodiversity unit change for the proposals within the site boundary of +2.32 Habitat Units (representing a calculated gain of 10.10%) and +1.94 Hedgerow Units (representing a calculated gain of 59.45%) within the site boundary.
- 5.71 Accordingly, it is clear that (subject to appropriate implementation in line with the measures set out), the proposals will/can achieve calculated gains in excess of 10% in line with mandatory net gain.
- 5.72 As such, it is considered that the proposed scheme accords with policy CS12 of the Local Plan and the NPPF.
- 5.73 At the time of submission, all surveys have been completed albeit bat and dormouse reports will follow on once the application has been submitted given survey data is still being processed.

Arboriculture

- 5.74 The Framework at paragraph 136 acknowledges that trees make an important contribution to urban environments and can also help mitigate and adapt to climate change. The paragraph advises that planning decisions should ensure new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments.
- 5.75 Submitted with the application is a Tree Survey and Impact Assessment prepared by Kean Consultants, which sets out that the proposed development results in the loss of very few trees, all of which are low quality and value. Short sections of hedgerow are indicated for removal but these can be offset by replacement planting.
- 5.76 The application proposals recognise the important contribution trees make to the character and quality of built environments, and the role they play to help mitigate and adapt to climate change. The proposals seek to retain existing trees and integrate new trees in accordance with the requirement of local and national planning policy.
- 5.77 To avoid material harm to the retained tree belt west of the proposed access, the footpath leading west has been segregated from the access and is proposed to pass

through the southern end of the tree belt to join with the existing footway along Green Lane. By segregating the footway, it permits the use of a no-dig form of construction. As the name implies, this enables the hard surface to be constructed without the need for excavation, that would have the potential for root loss. By adopting this method of construction harm to the trees is avoided. The details of this approach can be set out within an Arboricultural Method Statement, secured through a condition appertaining to the consent.

5.78 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 a 15m wide buffer as illustrated on the Land Use and Access Parameter Plan. This provides distance between the residential areas and offers a harmonious landscape setting for the wood.

5.79 It is considered that a suitably worded condition will secure any mitigation measures which may be required to minimise harm and ensure safe, long-term retention to existing and proposed trees on the site.

Transport and Accessibility

5.80 Policy CS11 of the adopted Local Plan sets out how developments should mitigate their impacts on the surrounding networks. Policy T1 and T5 of the Saved Local Plan set out similar in respect of impact on the transport system generated by new development, and ensuring that new accesses onto the network would not give rise to any danger and built to a standard acceptable to the LPA and LHA.

5.81 Submitted with the application is a Transport Assessment and Framework Travel Plan prepared by i-Transport. Pre-application engagement was undertaken with the Highways Authority and details of this can be found within the supporting Transport Assessment.

5.82 The proposed main vehicular access will be located to the south of the site, taking access from Green Lane in the form of a standard priority junction. Visibility splays of up to 58m have been calculated based on current recorded speeds on the road, albeit there is also the intention that the speed limit is reduced to 30mph (where 43m visibility splays would be required). Notwithstanding, suitable visibility for current speeds are achievable and thus the access is sited and designed appropriately. There will be 2.0m wide footways on both sides of the circa 5.0m wide carriageway. The footway will connect into the existing pedestrian footway on Green Lane by a proposed footway extension westwards from the site access. The proposed access on Green Lane is presented in Drawing No. ITL16459-GA-003C.

5.83 Swept path analysis has been undertaken at the proposed access to demonstrate that a refuse vehicle and fire tender vehicle can manoeuvre at the junction appropriately. Swept Path analysis has also been done to show two estate cars passing each other at the junction, the drawings of which are available in the appendices of the Transport Assessment.

5.84 In addition to the main vehicular access which will provide footways for pedestrian connectivity, there will also be an emergency vehicle access located to the north of the site and accessed onto Norwood Lane. This will also serve as a pedestrian and cycle access for residents to make their journeys north via quieter roads.

5.85 There is also the existing PRoW that crosses the site which will be retained and access for residents to Tradescant Drive will be retained for pedestrian access and providing permeability across the site. Drawing No. ITL16459-GA-011 shows the location of these accesses across the site.

5.86 As part of the development proposals, improvements to the pedestrian provision in the vicinity of the site have also been proposed. This includes the extension of the pedestrian footway on the northern side of Green Lane between the existing footway and the site access as referenced previously. There will also be a pedestrian crossing point on Green Lane at the site access. This is shown in Drawing No. ITL16459-GA-003C.

5.87 It is also proposed that the pedestrian crossing facilities at the A227 Wrotham Road / Green Lane junction are improved. This would be in the form of a raised pedestrian crossing on Green Lane with tactile paving. This will help prioritise pedestrian movement across Green Lane. A new crossing on the A227 Wrotham Road just south of the junction will also be provided with a pedestrian island refuge. These are shown on Drawing No. ITL16459-GA-007.

5.88 Finally, there are proposed enhancements to street lighting on Green Lane, with additional limited street lighting to be introduced at the site access, whilst also in keeping with the local limitation of lighting and recognising proximity to the National Landscape and its dark skies.

5.89 Saved Local Plan policy T4 sets out that the Local Planning and Highway Authorities will not normally permit any proposed development outside the confines of the built up area that generates significant vehicular or pedestrian traffic. The transport impact assessment determines the trip generation by all modes on local networks. In terms of active travel and sustainable modes, the existing networks, with the proposed improvements (mitigations) are able to accommodate the proposed increase in trips from the development.

5.90 In terms of highway impact, the proportional impact of the development on key junctions in the vicinity of the site is shown to be low. Capacity assessments are undertaken at each, which demonstrates there to be minimal impact from the development on the operation of these junctions and not a 'severe' one. All junctions continue to operate within capacity.

5.91 The Transport Assessment has demonstrated that the four key tests within paragraph 115 of the NPPF are met, being:

- That "sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location." This is evidenced within Section 4 of the TA and within the Vision of the development.

- That “safe and suitable access to the site can be achieved for all users”. This is demonstrated in Section 5 of the TA as well as the capacity assessment for the site access in Section 7.
- That “the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code”. The application is outline and as such details of the internal layout will be for reserved matters stages. However, the site layout will adhere to current guidance and policy both at national and local level.
- That “any significant impacts from the development on the transport network (in terms of capacity and congestion), or highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach”. The vision-led approach is set out in Section 6 of this TA which determines the number of trips generated by the site. Section 7 sets out the impact of these trips on the highway network showing that proportionally and in terms of capacity, the impact of the proposed development is minimal and can be accommodated adequately within the existing highway network. Section 4.9 also reviews collision data in the area.

5.92 In conclusion, the development is in accordance with transport and highways planning policy at a national, regional and local level. The impact of the development does not result in an unacceptable impact on highway safety nor are the forecast impacts on the road network found to be severe, in all reasonable scenarios. As such, the proposed development is considered to accord with policies CS11, T1, T4, T5 of the adopted Local Plan.

5.93 The internal layout of the proposed development will be delivered by future reserved matters application, which will detail internal routes/street layout, design speed, parking standards in accordance with policies T9 and P3 of the adopted Local Plan. The development of the parameter plan has had regard to this vision and a mix of street types, allowing pedestrian/cyclist permeability across the development.

Flood Risk and Drainage

5.94 Policy CS18 of the adopted Local Plan sets out that the Council will expect new development to take advantage of opportunities to reduce the causes and impacts of flooding from all sources where it is technically and financially feasible. In new development, the Council will require that surface water run-off has, as a minimum, no greater adverse impact than the existing use; and require the use of Sustainable Drainage Systems on all developments where technically and financially feasible.

5.95 Submitted alongside the application is a Flood Risk Assessment and Conceptual Drainage Strategy prepared by RPS, which indicates that the site and its associated access/egress is wholly located within Flood Zone 1. The annual probability of flooding is classified as less than 1 in 1000 year (<0.1%) in the absence of any defences. Due to the site’s location, it is not considered to be at risk of tidal flooding. The risk to site from fluvial flooding is considered to be low.

5.96 Following the Drainage Hierarchy, the potential for storage and infiltration of runoff has been considered. Surface water runoff arising from new impermeable areas of the site will be directed into three enhanced infiltration basins within the site, with flows discharging to ground via infiltration from the sides and base of the basins. The

enhanced infiltration basins have been designed with a maximum 1 in 3 gradient slope and are to be 1.5m deep, including a 0.3m freeboard. A 5m easement from infiltration features to building and road foundations has also been provided to prevent damage to foundations from arising. The enhanced infiltration basins will be underlain by a 300mm deep layer of gravel to further improve the water quality mitigation properties of the infiltration basins. The proposed surface water drainage management will be undertaken in accordance with the latest local and national SuDS policies such that development will not cause an increase in flood risk off site.

- 5.97 The foul water drainage strategy is included within the conceptual drainage strategy, Appendix H, and is subject to detailed design. Foul flows are to drain via gravity to a Southern Water sewer reference MH7301 located to the north of the site in Norwood Lane. This connects to a 150mm diameter pipe in Norwood Lane
- 5.98 The report concludes that the development would be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk would be achieved through the design of the infiltration systems to cater for the 1 in 100 year event including a 40% climate change allowance.
- 5.99 As such, it is considered that the proposed scheme accords with policy CS18 of the Local Plan and the NPPF.

Heritage and Archaeology

- 5.100 Submitted alongside the application is a Cultural Heritage Desk Based Assessment prepared by RPS.
- 5.101 This sets out that, in respect of heritage, the Site does not contain any designated or non-designated built heritage assets nor have any non-designated built heritage assets have been identified as relevant to this assessment.
- 5.102 In terms of relevant designated built heritage assets, the Grade II* Church of St Mildred (NHLE ref.1096351), the Grade II Northwood Farmhouse (NHLE ref.1039912), the Grade II Bailiff's House (NHLE ref.105233), the Grade II Camer House (NHLE ref. 1052357), and the Grade II Building Approximately 30 Metres to West of Camer House (NHLE ref.1350234) are considered relevant to this assessment for their potential to be affected by the proposed development through the alteration of their settings. The Site has a historical relationship to the Grade II Camer House and Grade II Bailiffs House through a mutual owner in the earlier-mid 19th century. This specific past relationship is now legible only through reference to historical documentary sources.
- 5.103 The proposed development is considered to represent an overall low degree of harm to the significance of the Grade II Bailiffs House on the spectrum of less than substantial harm through the erosion of the building's wider rural-agricultural setting with which it has a historical-functional relationship. The proposed development is not considered to affect the significance of the Grade II Camer House or the Grade II building approximately 30m west of Camer House as a result of intervening visual and experiential barriers. The proposed development is considered to represent a low degree of less than substantial harm to the significance of the Grade II* Listed Church of St Mildred through change to a long range viewing corridor from the Site by which

this building can be appreciated as a local landmark of historical origin within a historically rural-agricultural landscape context.

- 5.104 In accordance with paragraph 215 of the NPPF any degree of less than substantial harm should be weighed against the public benefits of the proposed development. The public benefits of the scheme are set out in section 7 of this Planning Statement and are considered to outweigh the less than substantial harm to the identified heritage assets.
- 5.105 In respect of archaeology, no Scheduled Monuments, World Heritage Sites, Registered Battlefields, Registered Parks and Gardens or Historic Wreck sites lie within the Site or its immediate vicinity.
- 5.106 No designated archaeological heritage asset has been identified as relevant to this assessment for the potential of the proposed development to affect its significance through the alteration of its setting. This is a result of intervening distance and visual and other experiential barriers precluding the proposed development from altering the way in which any designated archaeological asset is experienced or understood.
- 5.107 The Site is likely to have been cultivated from the Medieval period onwards. The Site is likely to contain evidence of historic cultivation in the form of plough soils and below ground evidence of land division.
- 5.108 It is considered that the Study Site has high potential for archaeological evidence of agricultural use dating to the Medieval and post-Medieval/Modern periods. A low potential is identified for the presence of all other forms of archaeological evidence relating to all past periods of human activity.
- 5.109 A moderate but widespread below ground impact is identified as arising from the historic and modern agricultural use of the Site. The Site has not previously been subject to built development and is considered to retain its archaeological potential.
- 5.110 Any archaeological evidence present within the Study Site is most likely to be of low (local) significance only. A geophysical survey of the Study Site (Appendix 1) does not indicate the presence of extensive or significant archaeological features.
- 5.111 The Local Planning Authority is anticipated to require further archaeological information in this instance. An archaeological evaluation represents a proportionate response to the archaeological potential identified. Any such archaeological works could follow the granting of planning consent and be secured by an appropriately worded archaeological planning condition.
- 5.112 As such, it is considered that the proposed scheme accords with policies CS20, CS12, TC2 and TC7 of the adopted Local Plan as well as the NPPF.

Energy and Sustainability

- 5.113 Policy CS18 of the adopted Local Plan sets out the approach to water demand management and carbon reduction required in new development.

- 5.114 The proposals will follow a fabric first approach to reduce energy demand, combined with low carbon or renewable energy systems, the proposed development will deliver a level of energy performance and a reduction in CO2 emissions in accordance with the current Building Regulations standards.
- 5.115 Water usage will be reduced using flow restrictors and low use appliances where applicable, in accordance with Part G of Building Regulations.
- 5.116 The proposal will provide electric vehicle charging infrastructure in accordance with Approved Document S (EV charging infrastructure) of The Building Regulations 2010.
- 5.117 The proposals also include measures to address overheating risk and climate resilience, sustainable and responsible materials usage and water consumption of the homes. Provision for internal waste and recycling storage will be provided.
- 5.118 The Government is introducing the 2025 Future Homes Standard. This will set standards for target carbon reduction of 75-80% compared to the 2013 Building Regulations. Homes on the site will meet Future Homes standards.

Contamination

- 5.119 Policy CS19 of the adopted Local Plan sets out that new development will be located, designed and constructed to avoid adverse environmental impacts from pollution and land contamination.
- 5.120 This application is supported by a Combined Phase 1 & 2 Site Assessment prepared by RPS which confirms that the site is considered to pose a low risk to human health and controlled waters, however it may be prudent to undertake confirmatory level ground gas monitoring as part of any future detailed site assessment.
- 5.121 It is considered that the details above can be ensured via inclusion of a suitably worded condition, and as such the development would accord with policy CS19.

Utilities

- 5.122 It is anticipated that the proposed development will make the best use of existing infrastructure located within close proximity to the site, with new supplies and connections taken from the existing local network.

6. Planning Obligations and Affordable Housing Statement

Affordable Housing Statement

- 6.1 The proposed development will provide 50% affordable housing (equivalent to up to 75 affordable homes). The mix and tenure split will be discussed during the application determination period and secured through the S106 Agreement.
- 6.2 The proposed level of affordable housing is in excess of the local policy requirements set out in Policy CS16 (Affordable Housing) which requires 35% affordable housing provision. The provision of 50% affordable housing accords with the 'golden rules' set out in paragraphs 156 and 157 of the NPPF (2024); which require an affordable housing contribution "15% percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%," on planning applications for major development in the Green Belt.

Planning Obligations

- 6.3 Paragraphs 56 to 59 of the Framework (2024) confirm that planning obligations or conditions can be used to make otherwise unacceptable development acceptable in planning terms. Paragraph 56 states "*Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.*"
- 6.4 Paragraph 58 outlines the three tests which planning obligations must meet, these include:
 - a) necessary to make the development acceptable in planning terms*
 - b) directly related to the development*
 - c) fairly and reasonably related in scale and kind to the development.*"
- 6.5 It is a local validation requirement that draft Heads of Terms accompany any application that requires a planning obligation, therefore this section we set out the proposed heads of terms.
- 6.6 Gravesham have adopted the KCC Development Contributions Guide (March 2007) which sets out the requirement for and the calculation of development contributions for KCC provided services. It goes on to note that contributions are also likely to be sought for other non-KCC facilities (including affordable housing, open space, health, police and emergency services etc.).
- 6.7 In view of the relevant planning policy requirement and the findings presented within the technical reports submitted in support of this outline planning application, a list of the proposed planning obligations has been prepared. These are set out below and provide the basis for the draft Heads of Terms (HoTs):

- 50% onsite Affordable Housing;
- Affordable Housing Mix;
- On-site open space provision;
- On-site children's play space provision;
- PROW Enhancements;
- On-site Biodiversity Enhancements and achievement of Biodiversity Net Gain; and

6.8 All planning obligations are to be discussed and agreed with Gravesham Borough Council and relevant third parties and are subject to meeting the relevant tests.

7. Summary and Conclusions

Sustainable Development

- 7.1 The Gravesham Policies Map illustrates that the site is located within the Green Belt, adjacent to the boundary of Hook Green, Meopham, a Rural Settlement inset from Green Belt. The principle of development is not supported by the adopted Development Plan, however there are material considerations which indicate otherwise.
- 7.2 Firstly the Local Plan is out of date by virtue of both its age and the lack of a demonstrable five year housing land supply within the Borough indicates that the policies most important to housing delivery are also considered out of date. As such the presumption in favour of sustainable development at paragraph 11 of the Framework is engaged and the application should be considered against the 'tilted balance' set out at paragraph 11d where planning permission should be granted unless the adverse effects of doing so would significantly and demonstrably outweigh the benefits of the proposals.
- 7.3 The proposal has been considered against the definition of 'inappropriate development' in the Green Belt, as set out in the Framework and it has been concluded that it should not be regarded as 'inappropriate' as it satisfies all criterial (a-d) within paragraph 155.
- 7.4 A Green and Grey Belt appraisal has been undertaken and concludes that the site meets the definition of grey belt by virtue of not making a strong contribution to Green Belt purposes a, b and d and the site not being subject to any of the policies relating to the areas or assets in footnote 7 of the NPPF which would provide a strong reason for refusing or restricting development. The appraisal also concluded that the development would not affect the strategic functioning of the Green Belt across the Borough due to its small size and proximity to the existing village. In this regard the site satisfies part a of paragraph 155.
- 7.5 The council is currently unable to demonstrate a five year supply of deliverable sites and the latest Housing Delivery Test result was 59% representing an extended period of undersupply in the Borough. It can therefore be considered that Gravesham Borough Council has a demonstrable unmet need for housing, in accordance with the definition at footnote 56 of the NPPF. The Site is sustainably located (as set out in the 'sustainable location' section of this Planning Statement above). Accordingly parts b and c of paragraph 155 of the NPPF are engaged.
- 7.6 The proposed development will deliver on the 'Golden Rules' in accordance with paragraphs 156 and 157 of the NPPF (December 2024) for appropriate development in the Green Belt which will include 50% affordable housing and over 1.6ha of publicly accessible green spaces. Local infrastructure improvements such as the extension of the pedestrian footway on the northern side of Green Lane between the existing footway and the site access, new pedestrian crossing point on Green Lane at the site access, improved pedestrian crossing facilities at the A227 Wrotham Road / Green Lane

junction and new crossing on the A227 Wrotham Road south of the junction will also be provided with a pedestrian island refuge are also included. In addition, the main vehicular access will provide footways for pedestrian connectivity and the emergency vehicle access located to the north of the site will serve as a pedestrian and cycle access for residents to make their journeys north via quieter roads.

- 7.7 The proposal meets parts a-d of paragraph 155 and fulfils the golden rules of paragraphs 156-157. For this reason, the proposed development should not be regarded as inappropriate development in the Green Belt.
- 7.8 The proposals represent a sustainable development well related to the existing settlement of Meopham which offers a range of services and facilities. of the proposal contributes to the three objectives of sustainable development, as defined within the NPPF and these benefits are summarised below.

Economic of Development

- 7.9 Housing development is a key component of economic growth and the additional population will support the vitality and viability of services and facilities in Meopham. The proposed development represents an efficient use of a sustainable site and land that is adjacent to the existing settlement of Hook Green, Meopham. Hook Green, Meopham is a sustainable location for development and is a Second Tier Settlement in the Borough. The provision of such housing will contribute positively to the local economy, through the provision of construction jobs in the short-term and providing local employees and additional council tax revenues in the longer-term. The development will also generate income through increased council tax base and S106 contributions which is a positive economic benefit.

Social Benefits of Development

- 7.10 The application proposes up to 150 new homes, 50% of which will be affordable housing that will contribute to Gravesham's five year housing land supply.
- 7.11 The proposal includes 1.6ha of publicly accessible high-quality open space and green infrastructure, which will provide amenity benefits to both existing and future residents.
- 7.12 New footpath links from Green Lane and Norwood Lane will improve pedestrian permeability through the site and accessibility to Camer Park Country Park. New crossing provision at Green Lane will improve the safety of pedestrians in this area. The proposals make effective use of the site, with residential development located and linked to adjacent existing built form, ensuring the development delivers housing in a location that is sustainable and well connected .

Environmental Benefits of Development

- 7.13 The proposals include new green infrastructure and new planting that will contribute towards ecological benefits for local habitats and species. Churchway Wood will be retained and protected by a green buffer. A biodiversity net gain of at least 10% will be achieved.
- 7.14 The site will provide a sustainable drainage system to manage surface water.

7.15 Electric vehicle charging provision will be made for new homes.

7.16 The National Landscape to the south of the site will be respected and a long range viewing corridor between this and St Mildred's Church to the north will be protected through the proposal.

The Planning Balance

7.17 The proposal provides the opportunity to deliver a high quality residential scheme, which will meet a pressing need for market and affordable housing in a sustainable location. The proposal shall facilitate considerable benefits for new and existing residents, and for the settlement as a whole. Overall, the proposals are considered to comprise sustainable development that complies with the policies of the Framework and those parts of the Development Plan which are most relevant.

7.18 The applicant acknowledges that the proposals are situated within the Green Belt and outside of the existing settlement boundary. However the application Site is considered to be a logical location for development as it is well related to the existing settlement boundaries and built-up area of Hook Green, Meopham and the proposals will deliver a sustainable development which will bring a range of benefits.

7.19 Gravesham Borough Council acknowledges that it is currently unable to demonstrate a five year housing land supply as confirmed through their recent Housing Land Supply Update (February 2025). The shortfall is significant with the latest published supply being only 3 years. These proposals could be delivered within the first five years and would help to address this shortfall.

Heritage Balance

7.20 The table below sets out the applicant's position with regard to the benefits and harm that the proposed development would generate.

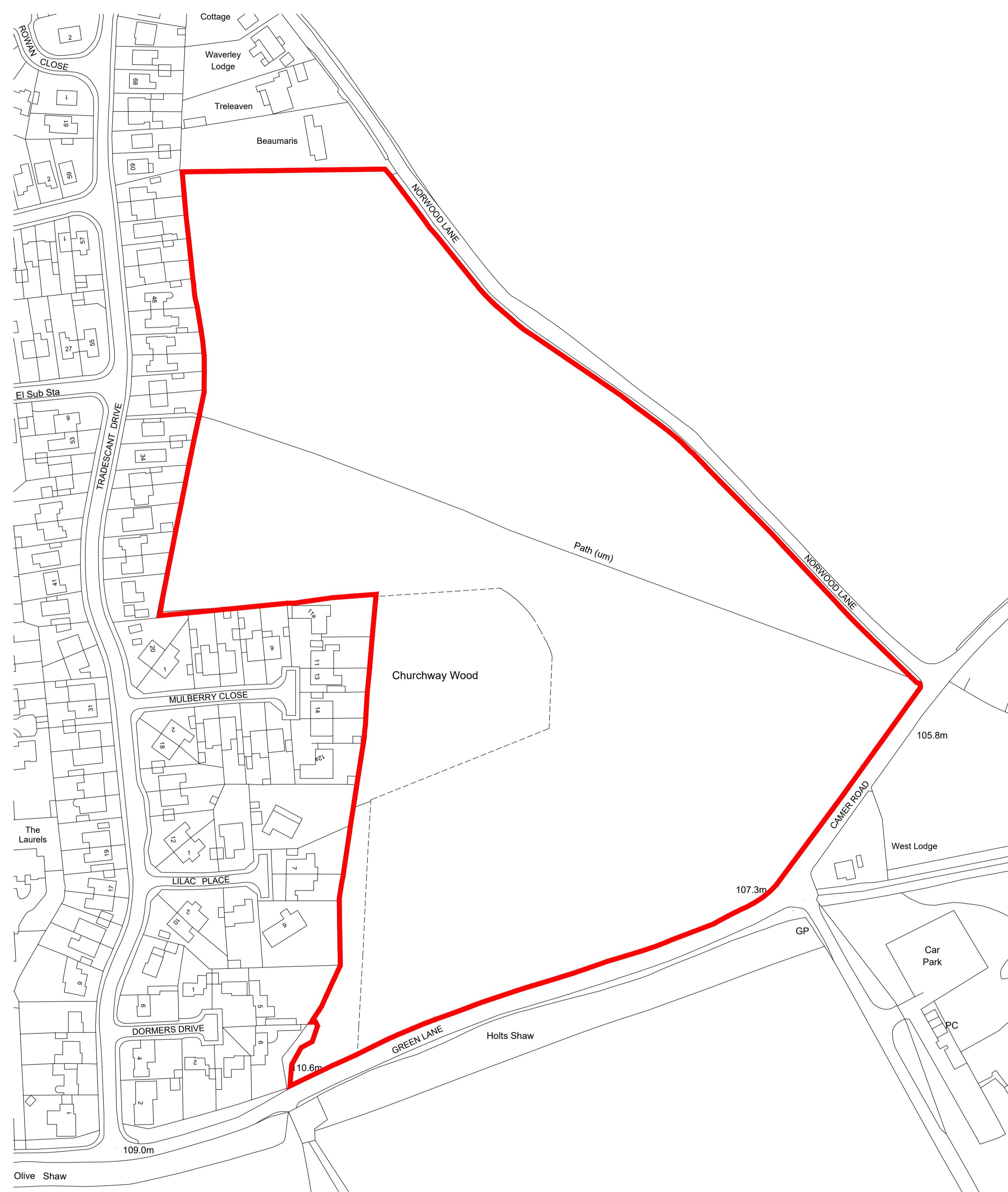
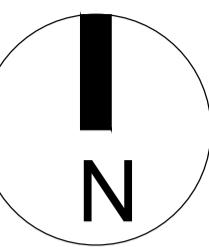
Benefits	Potential Harm
<ul style="list-style-type: none"> Delivery of up to 150 new residential dwellings (including 50% affordable) which will bolster the Council's supply. Contribute towards addressing the significant housing needs of present and future generations. The proposed development will create a neighbourhood in a sustainable location. Delivery of a BNG percentage of at least 10% through a landscape led masterplan that has considered the existing green infrastructure and 	<ul style="list-style-type: none"> Loss of Green Belt (however 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) Loss of low quality trees / hedgerow for access (however significant planting is proposed to mitigate against this). A low degree of less than substantial harm to the significance of the Grade II* Listed Church of St Mildred

<p>proposes enhancements as part of the proposed strategy.</p> <ul style="list-style-type: none"> ● Creation of new pedestrian and cycle links, and designated play space that create social value for the existing and future community. ● Contributions towards the local economy in providing construction jobs in the short term. ● Additional Council tax revenues created longer term. ● Increased patronage of local facilities which will contribute positively towards sustaining and maintaining local businesses and services in Meopham. ● The social and health benefits arising from the inclusion of publicly accessible high-quality open space and green infrastructure will provide amenity benefits to both existing and future residents. ● Provision of over 1.6ha of public open space, including provision of amenity green space, children's play provision, landscaping and footpaths. ● Retention of the existing boundary vegetation and Churchway Woods, strengthened with appropriate new native planting as appropriate. 	<p>through change to a long range viewing corridor from the Site by which this building can be appreciated as a local landmark of historical origin within a historically rural-agricultural landscape context (the submitted parameter plan defines a viewing corridor north to south through the site to allow long range views of the Church and also towards the National Landscape).</p>
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7.21 In respect of the low level of less than substantial harm to the significance of the Grade II* Listed Church of St Mildred, paragraph 215 of the NPPF sets out that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”*.

- 7.22 The Historic Environment PPG sets out that "*public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8)*".
- 7.23 There are significant public economic, social and environmental benefits to the scheme, which are considered to outweigh the low level of less than substantial harm.
- 7.24 It is proposed that a suitable legal agreement will secure the delivery of relevant planning obligations, where these are found to meet the tests described at Section 123 of the Community Infrastructure Regulations (2010).
- 7.25 The Applicant considers that the benefits of the proposal significantly and demonstrably outweigh any adverse impacts and planning permission should be granted.

Appendix 1: Site Location Plan



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Row	Date	Revision Details	Pr	Ch
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Client's Name

Job Title
**Land west of Norwood Lane,
Moorham**

Drawing Title

Location Plan

Scale
1:1250 @ A1 / 1:2500 @ A3

KB KE 11.08.25

Job No Drawing No Rev

7458 PI_01

Status **INFORMATION**

Appendix 2: Submitted Application Documents

Document Name	Document Reference
Application Form and Certificates	PP-14151744
Covering Letter	Prepared by Turley
Planning Statement (incl draft Planning Obligations and Affordable Housing Statement, Sustainability and Utilities Statement)	Prepared by Turley
Location Plan	7458/PL/01
Land Use and Access Parameter Plan	7458/PL/02
Illustrative Masterplan	7458/PL/03B
Design and Access Statement	7458-D05C
Ecology Survey and Report	7007 EcoAp vf2 JW/JB
BNG Matrix	7007 BNG vf4 JW/JB
Flood Risk and Drainage Assessment	794-ENV-HYD-22099 rev 004
Heritage Statement	HER-01359 rev 1
Land Contamination Assessment	Appendix F of FRA - ref. 52731 R01 00
Landscape and Visual Impact Assessment	02651 August 2025
Landscape Strategy	August 2025 Rev B
Transport Assessment	NM/JN/BD/ITL16459-004A
Travel Plan	JN/BD/AL/ITL16459-005a
Tree Survey & Impact Assessment	2426-KC-XX-YTREE-TreeSurvey-and-ImpactAssessment-Rev0
Tree Constraints Plan	2426-KC-XX-YTREE-TCP01RevA
Statement of Community Engagement	Prepared by Turley Strategic Communications

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