



PLANNING STATEMENT

LAND AT ROSE FARM,
ISTEAD RISE

DECEMBER 2025


ESQUIRE
DEVELOPMENTS



ESQUIRE

DEVELOPMENTS

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1.0

INTRODUCTION

1.1 This Planning Statement has been prepared by Esquire Developments Limited (the Applicant) in support of an Outline planning application submitted in respect of 'Land at Rose Farm, Istead Rise' (hereafter referred to as the Site), as shown on the Site Location Plan (Drawing No. 22628B / 01 - **Appendix A**). The Site is located within the administrative area of Gravesham Borough Council (GBC).

1.2 The application seeks Outline planning permission for:

'Outline planning application for the demolition of 64 Downs Road and erection of up to 154No. residential dwellings (including affordable housing), with all matters reserved except for access. Creation of a new access from Downs Road'

i) Preparation and Submission of Supporting Documents

1.3 In order to prepare a comprehensive and thorough assessment to support the planning application, a number of specialist technical advisors and consultants have been appointed.

1.4 The following reports have been prepared (Table 1.1) in support of the application.

Table 1.1 – Planning Application Reports

Report	Consultant
Planning Statement (including SCI)	Esquire Developments
Design and Access Statement	Clague
Archaeological Desk Based Assessment	HCUK
Heritage Impact Assessment	HCUK
Outline Ecological Impact Assessment	EPR
Reptile Survey Report	EPR
Breeding Bird Survey Report	EPR
BNG Metric	EPR
Bat Survey Report	EPR
Habitats, Vegetation and Flora Report	EPR
BNG Validation Statement	EPR
Flood Risk Assessment and Drainage Strategy	Ardent
Transport Assessment	DHA Transport
Interim Travel Plan	DHA Transport
Landscape and Visual Impact Assessment	Stantec
Phase I Preliminary Risk Assessment	IDOM
Arboricultural Impact Assessment	Down to Earth

Report	Consultant
Air Quality Assessment	Ardent
Economic Benefits Statement	Marrons

- 1.5 The Application is supported by a number of plans and drawings which identify the current and proposed use of the Site as detailed in Table 1.2.

Table 1.2 – Application Drawing Schedule

Drawing Title	Drawing No
Site Location Plan	22628B / 01
Existing Block Plan	22628B / 02
Existing Buildings 1 of 5	22628B / 05
Existing Buildings 2 of 5	22628B / 06
Existing Buildings 3 of 5	22628B / 07
Existing Buildings 4 of 5	22628B / 08
Existing Buildings 5 of 5	22628B / 09
Parameter Plan	22628B / 10
Illustrative Masterplan	22628B / 11
Illustrative Landscape Masterplan	333102059 LP-LP-10 Rev C
Proposed Drainage Layout – Sheet 1	2500920-ACE-XX-XX-DR-C-0701 Rev PI
Proposed Drainage Layout – Sheet 2	2500920-ACE-XX-XX-DR-C-0702 Rev PI
Cut and Fill Analysis	2500920-ACE-XX-XX-DR-C Rev PI

- 1.6 Pre-application meetings and advice has been sought from GBC and KCC Highways in respect of the proposed development.

ii) Scope and Purpose of the Planning Statement

- 1.7 The purpose of this Planning Statement is to detail the development proposals, identify the planning merits of the application against adopted and emerging policy guidance and best practice, and to identify any other material considerations in order to undertake the planning balance.

- 1.8 The Planning Statement therefore:

- i)** Describes the Site and the surrounding area, including Planning History;
- ii)** Describes the proposed development;
- iii)** Identifies the relevant Planning Policy Framework by reviewing the relevant National and Local planning policy and guidance;
- iv)** Provides a Statement of Pre-Application Engagement; and
- v)** Provides a planning analysis of matters relating to the Development against the key material considerations.

- 1.9 The Planning Statement concludes that the proposed scheme is considered to be suitable development and will assist in meeting both general and specific housing needs which are currently not being met. There are no adverse impacts that would significantly and demonstrably outweigh the benefits when taken against the policies in the NPPF. The scheme therefore accords with Para 11d(ii) of the NPPF, and planning permission should be granted without delay.

iii) About Esquire Developments

- 1.10 Esquire Developments is a multi-award-winning SME Housebuilder based in Longfield, Kent. Founded in 2011, we have quickly established ourselves through the delivery of high quality bespoke residential developments in Kent.
- 1.11 Esquire Developments have adopted a tailored approach to its developments adapting designs and layouts to reflect local characteristics and respect local community's needs. This is through expert local knowledge and understanding of a place, but also positively engaging with the local community allowing for a focussed approach to planning, design, and greater understanding of the needs of the local community.
- 1.12 Each development is bespoke, and we do not have fixed house types. This allows us to be totally flexible when it comes to choosing the right mix and design of each home. This is reflected in the high-quality architecture and use of materials, but also quality of open spaces and the environment in which each development sits within.
- 1.13 Esquire Developments also delivers commercial buildings such as office space and children's nurseries to complement developments where local demand identifies such a need. This means our developments can meet a local community's needs in a number of ways, whether that is for people to live, work and play.
- 1.14 As an SME Housebuilder building approximately 120-150 dwellings per year, we can expediently deliver a high-quality product that brings variation and choice to the market and complement volume housebuilders.
- 1.15 We have also committed to proactively addressing the Climate Change Emergency through delivering 'all electric' developments and seeking to achieve at least a 50% carbon reduction in our homes based against current Building Regulations. This is achieved through a fabric first approach (thicker insulation and cavity walls and greater efficiency windows etc) as well as the use of Air Source Heat Pumps (i.e. no gas boilers). Electric Vehicle Charging points are fitted as standard on all dwellings.

iv) Small and Medium Enterprise Housebuilders

- I.16 The Ministry of Housing, Communities and Local Government published a Housing Reform Working Paper (28 May 2025) which announces further measures to support SMEs, recognising that the planning system needs to ensure that smaller housebuilders are able play a crucial role in the journey to get Britain building.
- I.17 The applicant, being a local SME, strikes a chord with the Governments direction of seeking to support SMEs and help deliver choice, through high quality developments.
- I.18 The content of the Housing Reform Working Paper is discussed in further detail in Section 4.

SITE LOCATION AND DESCRIPTION

i) The Site

- 2.1 The Site is situated to the southwest of the village of Istead Rise and extends to approximately 9.6ha. The Site comprises a number of fields in agricultural use and consists of intervening boundary vegetation and trees. Part of the Site contains a series of small paddocks that are subdivided by timber posts and electrical wires. A pylon tower is located within the western part of the Site, with the overhead powerline passing through the western part of the Site. A number of structures comprising a series of buildings of varying materiality and scale are located to the centre of the Site. An area of thin woodland outside the site boundary dissects the centre of the Site.
- 2.2 A two-storey residential building lies within the Site in close proximity to the adjoining properties that line Downs Road. To the north of the Site lies existing residential dwellings located on Downs Road, Rosegarth and Long Walk. These dwellings are mainly detached 2-storey properties. To the immediate east of the Site lies Istead Rise Primary School. To the south of the Site lies further agricultural fields and the village of New Barn is located approximately 530m further south from the most southern point of the Site.
- 2.3 The Site is located outside the existing village limits, as defined by the Gravesham Borough Core Strategy, and is wholly within the Green Belt.
- 2.4 The Site is located within walking distance of the village centre of Istead Rise, which consists of a number of services and facilities, namely a number of convenience stores, primary school, nursery, GP practice, dental practice, pharmacy and playing fields, community centre.
- 2.5 The Site is not located within a Conservation Area and there are no statutory or locally listed buildings on the Site. A Grade II listed building, Downs Hall, is located c.60m to the north of the Site. The Site is located within Flood Zone I and therefore is at low risk of flooding. There are no TPOs on or adjacent to the Site.
- 2.6 The Site was previously submitted to the Gravesham Regulation 18 Consultation in July 2018, and Regulation 18b Consultation on the Part I Local Plan Core Strategy Partial Review and Site Allocations Consultation in December 2020.

ii) Relevant Planning History

- 2.7 The relevant planning history for the Site is set out below:

Reference	Description	Decision
20250630	Request for a screening opinion in accordance with The Town and Country Planning Act	EIA Not Required (Fri 25 Jul 2025)

	(Environmental Impact Assessment) Regulations 2017 in respect of the residential development proposal at Rose Farm, Downs Road, Istead Rise.	
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3.0

**PROPOSED
DEVELOPMENT**

3.1 The application description of development is as follows:

‘Outline planning application for the demolition of 64 Downs Road and erection of up to 154No. residential dwellings (including affordable housing), with all matters reserved except for access. Creation of a new access from Downs Road’

3.2 The application proposals have been informed by pre-application engagement with GBC Planning Officers. Full details of community engagement are included within the Statement of Community Involvement section (Section 5).

i) Residential Development

3.3 The proposed development provides for up to 154No. residential dwellings, comprising a range of 1-5 bed properties. The properties will come forward as a mix of apartments, semi-detached and detached properties, all 2-storey in height.

3.4 Whilst the layout is only illustrative in nature it demonstrates how the Site could deliver 154No. dwellings. The density across the site is 16 dwellings per hectare, reflecting the Site’s village characteristics and surrounding uses as well as taking into consideration open spaces, topography, biodiversity net gain and high-quality design.

3.5 The indicative housing mix is as follows:

Table 3.1: Indicative Housing Mix

Dwelling	Number
1 bed	20
2 bed	42
3 bed	54
4 bed	33
5-bed	4
Total	154

3.6 It is proposed that 50% of the dwellings will be Affordable housing in accordance with national guidance relating to Grey Belt schemes and the ‘Golden Rules’.

ii) Access and Parking**a) Vehicular Access**

- 3.7 Primary vehicular access to the Site will be achieved via a new priority junction off Downs Road, with a 5.5m carriageway width. To facilitate the new access arrangement, No.64 will be demolished.
- 3.8 To inform the access design, an Automatic Traffic Count (ATC) survey was undertaken on Downs Road in proximity to the proposed Site access for the seven-day period commencing 8th March 2025. This survey recorded 85th percentile vehicle speeds of 34.6mph northbound and 31.9mph southbound. The recorded 85th percentile vehicle speeds equate to visibility splay requirements of 2.4 x 52.7m northbound and 2.4 x 46.8m southbound of the access.
- 3.9 An emergency access will also be provided off Longwalk. The emergency access will measure 3.7m in width, be installed with a collapsible bollard, and be utilised as a pedestrian / cycle access. This will also be a shared pedestrian / cycle access.

b) Pedestrian Access

- 3.10 Primary pedestrian access to the Site will be achievable via the vehicular access. 2.0m wide footways will be installed on both sides of the access, tying into the existing provision on Downs Road. An uncontrolled pedestrian crossing with a dropped kerb and tactile paving will be provided at the Site access junction to enable pedestrians to cross.
- 3.11 A further 2no. pedestrian accesses are also proposed. A second pedestrian access with a 2m wide footway will connect to Downs Road via the existing track that sits between 30 and 34 Downs Road. A third pedestrian access is proposed to be located at the emergency access onto Longwalk, measuring 3.7m wide and connecting to the existing footways.

c) Parking

- 3.12 As this application is in Outline, final parking numbers will be subject to a future Reserved Matters application. However, the Illustrative Site Layout Parking plan demonstrates that parking can be provided in accordance with the standards currently adopted by GBC; the Kent and Medway Structure Plan: Supplementary Planning Guidance 4 (SPG4) and with reference to the recently adopted KCC Parking Standards 2025.
- 3.13 In total, 332 allocated parking spaces are proposed. Vehicle parking has been provided with reference to the latest KCC standards and in accordance with SPG4, in the form of private driveways and parking courtyards. The one-bedroom dwellings have been provided with one allocated space, the two and three-bedroom dwellings have been provided with two allocated spaces and the four-

bedroom dwellings will be provided with three allocated spaces. Whilst SPG4 doesn't include a requirement for visitor spaces, KCC's updated standards do include visitor standards and as such 29 visitor parking spaces have been indicated, provided at a ratio of just over 0.2 spaces per dwelling.

- 3.14 Cycle parking will be provided at a rate of 1 space per bedroom and each dwelling will be provided with one Electric Vehicle (EV) charging facility, in line with the standards set out within the Building Regulations Part S.

d) Off-Site Enhancements

- 3.15 Following the results of the accessibility audit and pre-application discussions with KCC Highways and Transport team, a number of enhancements are proposed and are set out within the Transport Assessment. In summary, these enhancements include:

- Raised kerbs to be provided at identified bus stops;
- Bus shelter to be provided at Downs Road southbound stop with seating;
- Resurfacing of the existing red surfacing located within the vicinity of the school;
- Installation of uncontrolled pedestrian crossing point on Downs Road in proximity to Site access; and
- Contribution towards the 308 Bus Service.

iii) Design Principles

- 3.16 The Design and Access Statement (DAS) sets out the design principles and concepts that have been applied to the proposed development and the steps taken to appraise the context of the proposed development and how the design of the development has taken that context into account. The DAS also considers the approach to access and how relevant Local Plan policies have been taken into account.
- 3.17 The development proposals are landscape led, demonstrating a cohesive green infrastructure framework responding to the existing context of the Site. The proposals are considered to be in accordance with the principles set out in the Gravesham, Design Code and seeks to deliver a layout and dwelling sizes that reflect the local area.
- 3.18 The illustrative layout is formed around an access from Downs Road with a series of shared surface lanes. The layout implements techniques in wayfinding and placemaking, exploiting key views from and within the Site. Prominent dwellings at key points have been made features throughout with the use of active facades and materials.

- 3.19 Existing vegetation along the Site's boundaries is retained where possible and supplemented with additional planting. Substantial areas of open space (over 3.4ha) are proposed, incorporating walking routes, 2no. children's play area and SuDs.
- 3.20 The southern boundary incorporates a 15m landscape buffer which creates a natural transition to the surrounding landscape, and provides the opportunity for further tree planting.

iv) Drainage

- 3.21 The surface water drainage strategy discharges all surface water across the Site via infiltration (via two infiltration basins and one geocellular crate block) up to and including the 1 in 100 yr +45% climate change event. Two infiltration basins will ensure that significant biodiversity, amenity and surface water treatment is provided.
- 3.22 It is proposed that the foul water from the development will be discharged to the local foul drainage network provided by Southern Water via a number of connections. 2No. connections to the foul network via an onsite diversion in the western half of the Site are proposed, and a further via a connection on Downs Road for the northern portion of the Site.

v) Landscape and Ecology

- 3.23 The proposed development provides for substantial areas of landscaping, open space and ecology.
- 3.24 The Parameter Plan and Illustrative Landscape Masterplan identify that the proposals will retain and strengthen where possible the existing hedgerows, scrub and mature trees along the Site boundaries. The southern part of the Site is being retained and enhanced for landscape and biodiversity purposes. This area will include a children's play area, amenity grassland, walking route and landscape buffers. In addition, 2no. SuDs ponds are located centrally within the Site with amenity grassland and landscaping creating a focal point within the scheme.
- 3.25 The open space areas will be managed in the long-term via a management company and will remain outside of private ownership of the proposed dwellings. There is an opportunity to create log piles and wildlife habitats from tree felled to improve biodiversity on-site.
- 3.26 The Illustrative Landscape Masterplan identifies substantial new native species trees, hedgerow and wildflower rich grassland. A coherent hierarchy of street trees is proposed across the internal road network to support character and enclosure. Species selection will reflect Site conditions and climate resilience, contributing to a green and legible setting throughout the development.

3.27 The reinforcement of the existing perimeter vegetation will reinforce the Site boundaries and enhance visual containment integrating the development with neighbouring residential and wooded area.

3.28 The Landscape approach seeks a number of broad aims, namely:

- To create an attractive setting for the Proposed Development;
- To provide footpaths within an enhanced green infrastructure network to facilitate internal connectivity and access across the Site and into public open space in the southern edge of the Site;
- Create a sensitive open edge along the southern edge of the Site to complement the open character to the immediate south of the Site;
- To integrate newly introduced built forms sympathetically into the landscape and settlement character of Istead Rise;
- Create a multi-functional Green Infrastructure (GI) network, including play areas and accessibility to wetland areas, traditional and community orchards and informal 'play on the way' which provide multifunctional value as stepping stones and promote biodiversity net gain; and
- To enhance and extent the existing landscape framework where this assists with improving the quality and character of the local area, with reference to published landscape character assessments and management plans.

4.0

PLANNING POLICY CONTEXT

i) Introduction

- 4.1 The following section of this Statement identifies the most relevant planning policy and guidance at the National and Local level. Only policies relevant to the consideration of this application are included. The proposals are assessed against the relevant policy and guidance on a topic basis in Section 6.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that the determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 The Development Plan for the Site comprises the following:
- Gravesham Local Plan Core Strategy (2014)
 - Gravesham Local Plan First Review (1994) - saved policies
 - Kent County Council Minerals and Waste Local Plan 2013-30 (2020)
- 4.4 Other material considerations relevant to this application include the following documents:
- National Planning Policy Framework (2024);
 - National Planning Practice Guidance (2016 and as amended);
 - Kent Design Guide
 - KCC Parking Standards
- 4.5 The Gravesham Borough Council (GBC) Core Strategy was adopted in 2014. However, a shortfall of sites against the housing requirement was recognised at the Examination and was only found 'sound' on the basis an early review of housing needs was undertaken. This included a commitment to undertake a review of Green Belt boundaries.
- 4.6 Consultation on the Regulation 18 Local Plan Core Strategy Partial Review was carried out between April and July 2018. The Regulation 18b consultation on the Part I Local Plan Core Strategy Partial Review and Site Allocations Consultation was carried out in between October and December 2020.
- 4.7 Progress on the emerging Local Plan Core Strategy Partial Review has continued to be delayed and the timetable set reported to Cabinet in January 2023 has also slipped. There is currently no indication as to when the Regulation 19 Local Plan Core Strategy Partial Review will be published for consultation.

- 4.8 The NPPF (2024) published changes to the Standard Method Calculation and the five year housing requirement for Gravesham is 3,360 dwellings. This equates to 672 dwellings per annum. GBC cannot currently demonstrate a Five Year Housing Land Supply, with only 3 years' worth of deliverable housing supply as of June 2024, according to the Five-Year Land Supply Statement 2024–2029 (February 2025). This represents a shortfall of 1,603 dwellings over the 5 year period.
- 4.7 The latest confirmed Housing Delivery Test (HDT) confirmed that against a need of 1,789 dwellings only 1,056 were delivered resulting in a HDT measurement of 59% (as confirmed by MHCLG in December 2024). There is persistent under-delivery which has resulted in a significant shortfall of housing within the Borough.
- 4.8 The Local Plan policies relevant to the determination of this application (other than the 'saved' policies) are therefore considered to be out of date and, as a result, the so called 'tilted balance' applies to the determination of this planning application as explained in more detail in the following Section.

ii) National Planning Policy

National Planning Policy Framework (December 2024)

- 4.9 At the national level, the revised version of the National Planning Policy Framework ('NPPF') was published in December 2024. It provides the national planning policy context for the preparation of Development Plans and the determination of planning applications and states that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 4.10 The NPPF sets out the Government's approach for delivering the homes, infrastructure and places that are needed whilst both protecting and enhancing the natural and historic environment.
- 4.11 NPPF paragraph 2 confirms that the NPPF is a material consideration in planning decisions. Planning applications should be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.12 The NPPF directs that Councils should approach decision making in a 'positive way' (NPPF paragraph 39). Councils should therefore work positively with applicants to find solutions and to deliver sustainable developments that secure improvements to the economic, social and environmental conditions of an area.

Achieving Sustainable Development

- 4.13 Paragraph 8 of the NPPF identifies three overarching objectives to be pursued through the planning system in order to achieve sustainable development: an economic, social and environmental objective. The NPPF recognises that these objectives are not criteria against which every decision can or should be judged but planning decisions should guide development towards sustainable solutions whilst taking account of local circumstances, including the character, needs and opportunities of each area.
- 4.14 Paragraph 10 of the NPPF states that *‘so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development’*.
- 4.15 Paragraph 11 sets out how, for plans and decisions, the presumption in favour of sustainable development should be approached. For decision making 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-date⁸, granting permission 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 demonstrable 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 combination⁹.**

Decision Making

- 4.16 Paragraph 39 seeks that Local Planning Authorities should approach decisions on proposed development in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.
- 4.17 Para 40 advises early engagement has significant potential to improve the efficiency and effectiveness of the planning application system.

- 4.18 Paragraphs 48-51 address determining planning applications and that decisions should be made as quickly as possible. Para 48 advises that LPAs may give weight to relevant emerging plans according to their stage of preparation (the more advanced the greater weight), the extent to which there are unresolved objections and the degree of consistency of the relevant policies in the emerging plan to the framework.

Delivering a Sufficient Supply of Homes

- 4.19 Paragraph 61 recognises the Government’s objective of ‘significantly boosting the supply of homes’ considering that 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 planning permission is developed without delay’*.
- 4.20 Paragraph 63 advises the size, type and tenure of housing required for different groups in the community, should be assessed and reflected in planning policy. Paragraph 64 provides that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless:
- a) off site provision or appropriate financial contribution in lieu can be robustly justified; and**
 - b) The agreed approach contributes to the objective of creating mixed and balanced communities.**
- 4.21 Paragraph 63 recognises the important contribution of small and medium sized sites can make to meet the housing requirement of an area, which are often built out relatively quickly. These sites are essential for Small and Medium Enterprise housebuilders to deliver new homes. To promote the development of as good mix of sites, LPAs should undertake a number of actions, including identify at least 10% of their housing requirement on site no larger than 1ha.
- 4.22 Paragraph 78 seeks to ensure that Local Planning authorities identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing. The supply should include a buffer of either 5%, 10% or 20% depending on local circumstances.
- 4.23 Paragraph 79 seeks to maintain supply of housing by seeking to monitor sites that have planning permission. Where housing delivery falls below 95% an Action Plan should be prepared. Footnote 8 confirms that if delivery falls below 75% the presumption in favour of sustainable development as well as a 20% buffer is applied.

- 4.24 Paragraph 81 seeks to support delivery, including that planning permissions are implemented in a timely manner by way of a planning conditions that seeks a start on site within a timescale that is shorter than the relevant default period.

Promoting Healthy and Safe Communities

- 4.25 The NPPF identifies the role planning has in facilitating social interaction and creating healthy, inclusive and safe places. To achieve this, paragraph 96, amongst other matters, seeks to promote development which promote social interaction and enable and support healthy lifestyles.

Promoting Sustainable Transport

- 4.26 Paragraph 110 acknowledges that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making (linked with para 83).
- 4.27 When determining local parking requirements for residential developments, para 112 sets out that Councils should consider the accessibility, type, mix and use of a development, availability of public transport, local car ownership levels and overall need to reduce vehicle emissions.

Making Effective Use of Land

- 4.28 Paragraph 124 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.29 Paragraph 125 states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
- 4.30 Paragraph 129 confirms that development should be supported where it makes efficient use of land taking into account matters include the need for different types of housing and other forms of development, local market conditions and viability, the desirability of maintaining an area's prevailing character and setting and the importance of securing well-designed, attractive and health places.

Achieving Well-Designed Places

4.31 Paragraph 131 states that;

‘The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’

4.32 Paragraph 135 requires developments to function well and add to the quality of an area; establish a strong sense of place; optimise the potential of a Site; respond to local character and history; create a safe and accessible environment; and be visually attractive and include appropriate landscaping

4.33 Paragraph 136 identifies that trees make an important contribution to the character and quality of urban environments and can help mitigate climate change. Paragraph 132 advises that ‘Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests’.

4.34 Para 139 is clear that:

Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- a) **development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or**
- b) **outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings**

Protecting Green Belt Land

4.35 Chapter 13 confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Green Belt series five purposes:

- a) **To check the unrestricted sprawl of large built-up areas;**
- b) **To prevent neighbouring towns merging into one another;**
- c) **To assist in safeguarding the countryside from encroachment;**
- d) **To preserve the setting and special character of historic towns; and**
- e) **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

4.36 Paragraph 145 indicates that once established, Green Belt boundaries should only be altered through the preparation/updating of Local Plans, where exceptional circumstances are fully evidenced and justified.

4.37 Paragraph 153 directs that local planning authorities should ensure substantial weight is given to any harm to the Green Belt, including harm to its openness. Footnote 55 confirms the exception to this is in the case of previously developed or grey belt land, where development is not inappropriate. Paragraph 153 goes on to confirm that:

Inappropriate development, is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

4.38 ‘Grey Belt’ is defined in Annex 2: Glossary (Page 72) as:

Grey belt: For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in 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

- 4.39 Paragraph 154 sets out a number of exceptions where development in the Green Belt will not be considered inappropriate.
- 4.40 Paragraph 155 confirms 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.**
- 4.41 Paragraph 156 sets out the requirements of the ‘Golden Rules’ and confirms major development involving the provision of housing on land released from the Green Belt through plan preparation or review, or on sites in the green Belt subject to a planning application should meet these requirements:
- 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.**
- 4.42 Paragraph 157 confirms that until local plan policies are updated in line with the NPPF an affordable housing contribution of 15 percentage points above the highest existing affordable housing requirements will be required to satisfy the Golden Rules (subject to a cap of 50%). In the absence of an adopted policy requirement 50% will 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 the PPG.

4.43 Paragraph 158 confirms that:

A development which complies with the Golden Rules should be given significant weight in favour of the grant of planning permission.

4.44 Paragraph 159 requires improvements to green spaces required as part of the Golden Rules to contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist. Where no locally specific standards exist, development proposals should meet national standards.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

4.45 Paragraph 161 confirms the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. Amongst other things, it seeks to contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure.

4.46 Paragraph 163 outlines that the need to mitigate and adapt to climate change should be considered in preparing and assessing planning applications, taking in account the full range of potential climate change impacts.

4.47 Paragraph 171 confirms a sequential risk-based approach should be taken to individual applications in areas known to be at risk now or in future from any form of flooding. Paragraph 174 requires the sequential test to steer new development to the areas of lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonable alternative sites available with a lower risk of flooding.

4.48 Paragraph 181 requires Local Planning Authorities to ensure that flood risk is not increased elsewhere and Paragraph 182 outlines the need to incorporate sustainable drainage system to control flow rates and reduce volumes of runoff which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible through facilitating improvements in water quality and biodiversity, as well as benefits for amenity.

Conserving and Enhancing the Natural Environment

4.49 Paragraph 187 confirms that impacts on biodiversity should be minimised, and net gains provided through development. Paragraph 193 indicates that opportunities to improve biodiversity in and around development should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Conserving and Enhancing the Historic Environment

- 4.50 Chapter 16 provides for a positive strategy for the conservation of the historic environment, including heritage assets which should be conserved in a manner appropriate to their significance.

iii) National Planning Practice Guidance

- 4.51 The Planning Practice Guidance (PPG, first published 29 November 2016) builds on the principles within the NPPF and provides further detailed technical guidance, to complement the NPPF, on aspects such as design, flood risk, advertisements among other planning and environmental topic areas. Some relevant sections of the Guidance which relate to the planning application are listed below.

- 4.52 **Design** - Reference ID: 26-001-20191001 outlines that well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process, from policy and plan formulation through to the determination of planning applications and the post approval stage. It refers to the National Design Guide and that good design is set out under the following 10 characteristics:

- context
- identity
- built form
- movement
- nature
- public spaces
- uses
- homes and buildings
- resources
- lifespan

- 4.54 The development proposals fully accord with the above guidance by implementing a design that is sympathetic and in-keeping with the surrounding land uses, therefore respecting the local distinctiveness.

- 4.55 **Housing Supply and Delivery** - Reference ID: 68-001-20241212 identifies the standard method for calculating local housing need provides a minimum number of homes to be planned for. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach.

- 4.56 Reference ID: 68-005-20190722 confirms that where a local plan has not been adopted in the last 5 years or the strategic housing policies have been reviewed and do not require updating, that the 5 year supply will be measures against the areas local housing need using the standard method.
- 4.57 Reference ID: 68-008-20190722 confirms that In decision-taking, if an authority cannot demonstrate a 5 year housing land supply, including any appropriate buffer, the presumption in favour of sustainable development will apply, as set out in paragraph 11d of the National Planning Policy Framework.
- 4.58 Reference ID: 68-022-20190722 confirms that to ensure a realistic prospect of delivery, an appropriate buffer should be applied of either 5%, 10% or 20% in the first 5 years (including any shortfall (i.e. the Sedgfield method). The appropriate buffer is calculated by:
- 5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5-year housing land supply;
 - 10% - the buffer for authorities seeking to 'confirm' 5 year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in paragraph 74 of the National Planning Policy Framework), unless they have to apply a 20% buffer (as below); and
 - 20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results.
- 4.59 Reference ID: 68-036-20190722 sets out the method for calculating the Housing Delivery Test. Reference ID: 68-042-20190722 sets out the requirements and actions based on the results of the Housing Delivery test. Depending on the level of delivery, the following is applied:
- the authority should publish an action plan if housing delivery falls below 95%;
 - a 20% buffer on the local planning authority's 5-year land supply if housing delivery falls below 85%; and
 - application of the presumption in favour of sustainable development if housing delivery falls below 75%, subject to the transitional arrangements set out in paragraph 215 of the Framework.

iv) Green Belt Guidance

- 4.60 In February 2025 the Ministry of Housing, Communities and Local Government (MHCLG) published updated Green Belt guidance, reflecting the revised version of the NPPF (2024).
- 4.61 The guidance provides further detail with regards to assessing the contribution of Green Belt land against the purposes of the Green Belt and whether release would fundamentally undermine the remaining Green Belt in the plan area. It also sets out guidance for considering proposals on

potential grey belt land, identifying sustainable locations when considering the release or development of Green Belt land and the contribution of major housing development to accessible green space. Updated guidance is also provided regarding how to consider the potential impact of development on the openness of the Green Belt.

- 4.62 The guidance confirms that where grey belt land is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or approved for development in all circumstances. Consideration of the Green Belt purposes is one consideration, decisions about Green Belt land should be informed by overall application of the relevant policies in the NPPF.
- 4.63 Reference ID: 64-001-20250225 confirms that authorities are required to identify whether land is grey belt for the purpose of considering planning applications on Green Belt land and states that:

Where land is identified as grey belt land, any proposed development of that land should be considered against paragraph 155 of the NPPF, which sets out the conditions in which development would not be inappropriate on grey belt land.

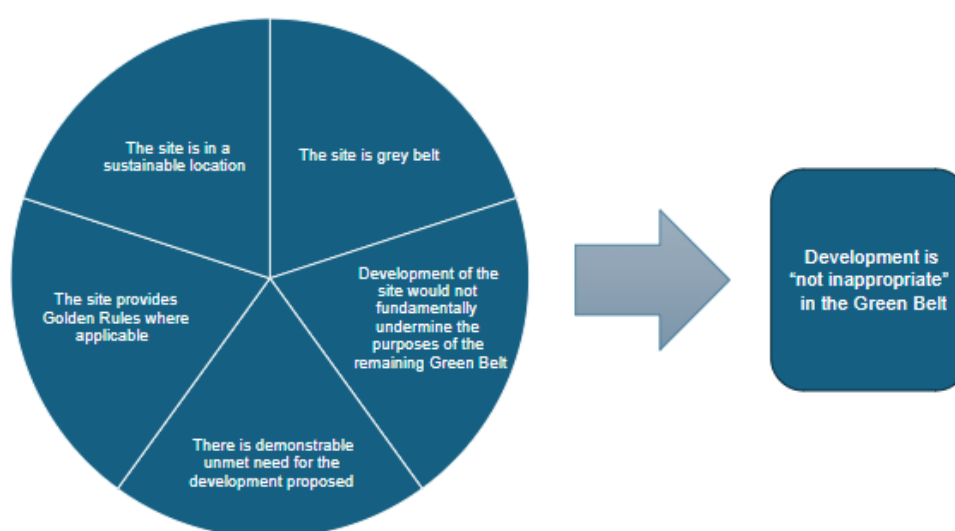
- 4.64 Reference ID: 64-002-20250225 requires authorities to produce a Green Belt Assessment to identify Green Belt land. Reference ID: 64-003-20250225 sets out the steps to be followed by authorities when undertaking this assessment and provides guidance for each step.
- 4.65 Reference ID: 64-005-20250225 confirms how the contribution land makes to the relevant Green Belt purposes should be assessed. It sets out the illustrative features that would be present if a site made a 'strong', 'moderated' or 'weak or none' contribution to Purposes (a), (b) and (c).
- 4.66 With regards to Footnote 7, Reference ID: 64-006-20250225 confirms that in accordance with the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 4.67 Reference ID: 64-007-20250225 confirms that once the above assessment has been undertaken and it is concluded that the assessment area does not strongly contribute to any one of the relevant purposes and the application of policies relating to Footnote 7 areas or assets does not provide a strong reason for refusing or restricting development.
- 4.68 Reference ID: 64-008-20250225 requires Green Belt assessments to consider the extent to which the release or development of Green Belt land would affect the ability of the remaining Green Belt across the plan area from serving all 5 of the Purposes in a meaningful way.
- 4.69 Reference ID: 64-009-20250225 states that an assessment of the Green Belt (alongside other considerations) will inform the determination of planning applications. Where grey belt sites are

not identified in existing plans or Green Belt assessment, it is expected that authorities should consider evidence on:

- **whether the site strongly contributes to the Green Belt purposes a, b or d; and**
- **whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development; and**
- **whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance.**

4.70 Reference ID: 64-010-20250225 confirms that where a site is judged to be grey belt, wider consideration will still be relevant including determining whether the development would not be inappropriate development in the Green Belt, as set out in paragraph 155 of the NPPF. The guidance then goes on to confirm the following:

Where a development is not inappropriate in the Green Belt, this does not itself remove the land from the Green Belt nor require development proposals to be approved. In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, wider policies and considerations apply, including those in the area's adopted Plan, and in the NPPF read as a whole.



4.71 Reference ID: 64-011-20230225 confirms that when making decisions regarding planning applications on grey belt land, authorities should ensure that the development would be in a sustainable location. For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate. Decisions on

sustainability should be determined in light of local context and site or development specific considerations. Opportunities to maximise sustainable transport solutions should be considered in accordance with paragraphs 110 and 115 of the NPPF.

- 4.72 Reference ID: 64-012-20250225 refers to the Golden Rules, specifically with regards to accessible green space and sets out a number of contributions which should be considered.
- 4.73 Reference ID: 64-014-20250225 confirms how harm to the openness of the Green Belt is considered if a development is not inappropriate development in the Green Belt:

Footnote 55 to the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.

- 4.74 The guidance confirms that this is consistent with rulings from the courts, where development (of any kind, now including grey belt or PDL) is not considered to be inappropriate in the Green Belt and the tests of impacts to openness or to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by “very special circumstances”.

v) Viability Guidance

- 4.75 Viability Guidance provided by MHCLG and updated in line with the revised NPPF (2024) provides guidance on the ‘Golden Rules’ for Green Belt development. It confirms that where development takes place on land situated in, or released from, the Green Belt and is subject to the ‘Golden Rules’ set out in paragraph 156 of the National Planning Policy Framework, site specific viability assessment should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing (Reference ID: 10-029-20241212)
- 4.76 The guidance confirms that prior to development plan policies being updated in accordance with paragraph 67 of the NPPF, the affordable housing contributions are subject to an overall cap of 50%. The highest existing affordable housing requirement means the highest requirement an authority can seek in line with its existing policy.

vi) Gravesham Local Plan Core Strategy (September 2014)

- 4.77 The Gravesham Local Plan Core Strategy was adopted over 10 years ago in September 2014.

- 4.78 The policies relevant to the proposed development are as follows:
- 4.79 **Policy CS01: Sustainable Development** – confirms that planning applications that accord with the policies in the development plan will be approved without delay, unless material considerations indicate otherwise. When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy.
- 4.80 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.
- 4.81 **Policy CS02: Scale and Distribution of Development** - Culverstone Green is classified as a Third Tier Settlement within the Settlement Hierarchy. Policy CS02 indicates that the development strategy is to retain and improve the existing stock of housing and suitable employment land and to make provision for the borough's objectively assessed need for at least 6,170 new dwellings.
- 4.82 In the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in the plan.
- 4.83 **Policy CS10: Physical and Social Infrastructure** - Where new development leads to the need for new or improved physical or social infrastructure, developers will be required to provide or contribute towards this subject to viability considerations. Such infrastructure will be put in place in a timely manner to support new development. All new development should make the most efficient use of new and existing infrastructure.
- 4.84 **Policy CS11: Transport** - New developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel.
- 4.85 Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.
- 4.86 The Council will support proposals which improve public transport provision and facilities in the Borough.
- 4.87 **Policy CS12: Green Infrastructure** - A multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained.

- 4.88 There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, recreate and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.
- 4.89 The overall landscape character and valued landscapes will be conserved, restored and enhanced.
- 4.90 **Policy CS13: Green Space, Sport and Recreation** - The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.
- 4.91 **Policy CS14: Housing Type and Size** – new developments will be expected to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.
- 4.92 **Policy CS15: Housing Density** – site will be delivered at a variety of densities, depending on their location and accessibility to public transport. All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. In the rural area new residential development will be expected to achieve a minimum density of 30 dwellings per hectare.
- 4.93 **Policy CA16: Affordable Housing** – on all new developments of 3 dwellings or more or on sites of 0.1 hectares or more in the rural area 35% affordable housing will, be required.
- 4.94 An affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing will be required.
- 4.95 **Policy CS18: Climate Change** - The Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use and require the use of Sustainable Drainage Systems.
- 4.96 The Council will seek to manage the supply of water in the Borough and reduce the impact of new development on the supply of potable water as much as possible. Require all new homes limit water use to 105 litres per person per day.
- 4.97 **Policy CS19: Design and Development Principles** - New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti- crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. A number of criteria are set out within the policy.

vii) Saved Policies in the Gravesham Local Plan First Review 1994

4.98 The relevant policies saved policies contained in the Gravesham Local Plan First Review 1994 are set out below:

- P3 - Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network
- T5 - New Access onto the Highway Network
- TC7 – Other Archaeological Sites
- LT6 – Additional Open Space in New Housing Developments

viii) Supplementary Planning Guidance and Other Documents

4.99 A number of Supplementary Planning Guidance (SPG) documents have been adopted which elaborate on saved policies in the Local Plan First Review and Core Strategy. The following are relevant to this development:

- Design for Gravesham – Design Code SPD
- Residential Layout Guidelines SPG2
- KCC Parking Standards SPG 4
- KCC Guide to Development Contributions and the Provision of Community Infrastructure (2007)

ix) Emerging Local Plan

4.100 The Council is currently in the early stages of preparing the Local Plan Core Strategy Review. The Regulation 18 Part 1 consultation took place in 2018 and The Regulation 18b consultation was published in December 2020 (Part 2).

4.101 A revised Local Development Scheme was published in March 2025. The LDS indicates that consultation on the Regulation 19 Local Plan Core Strategy Partial Review will take place in July 2025, with the Plan submitted for Examination in December 2025. Adoption of the Local Plan Review is expected December 2026. As the target for publication of the Regulation 19 Plan has passed, it can be expected that the remainder of the timetable will be delayed.

4.102 Significant time has passed since the publication of the latest consultation of the Local Plan Core Strategy Review. However, as part of the latest consultation, the Site was identified as a proposed allocation for up to 165 dwellings (site reference: GBS-L) which demonstrates the suitability, availability and deliverability of the Site to deliver this quantum of development.

x) Kent Minerals and Waste Local Plan 2013-30 (as amended by Early Partial Review 2020)

4.103 The Kent Minerals and Waste Local Plan 2013 - 2030 (KMWLP) was adopted in July 2016 and sets out the vision and strategy for waste management and mineral provision up until the year 2030. It also contains a number of development management policies for evaluating minerals and waste planning applications. The KMWLP underwent an Early Partial Review on several policies over 2016 - 2020. In September 2020, the KMWLP as amended was adopted. The site is not identified as an area which is impacted by mineral safeguarding zones therefore this plan is not considered any further.

xi) Support for Small and Medium Housebuilders (SMEs)

4.104 There has been a substantial and conscious recognition from Central Government in respect of seeking to support existing SMEs and in seeking to encourage more SME Housebuilders into the market. The Role of SMEs and the challenges they face has been set out in **Appendix B** of this statement. Appendix B sets out the attempts that Government has made to help diversify the market, recognising the positive role SMEs can play in helping offer choice and delivery in the housing market. Appendix B identifies the declining role SMEs have had in the housing market, how the planning system is skewed against them (in a plan making sense) and how, firstly through the amendments to the NPPF (para. 73) and more recently through the House of Lords Built Environment Committee 'Meeting Housing Demand' report recommendations.

4.105 The Ministry of Housing, Communities and Local Government published a Housing Reform Working Paper (28 May 2025) which announces further measures to support SMEs. The paper intends to amend site thresholds and simplify planning requirements for small housing sites. The paper states that the planning process has become disproportionate for SME housebuilders in bringing forward sites for development and that today's national policy and regulations only differentiate between minor applications (under 10 units), and major applications (10 or more). The paper adds that this creates additional risk and uncertainty for SMEs, alongside upfront costs and delays to the process, which can be harder for smaller housebuilders to absorb.

4.106 The paper states that the planning process has become disproportionate for Small and Medium Enterprise (SME) housebuilders in bringing forward sites for development and that today's national policy and regulations only differentiate between minor applications (under 10 units), and major applications (10 or more). The paper adds that this creates additional risk and uncertainty for SMEs, alongside upfront costs and delays to the process, which can be harder for smaller housebuilders to absorb.

4.107 The announcement by Angela Rayner, deputy prime minister and housing secretary, said:

“Smaller housebuilders must be the bedrock of our Plan for Change to build 1.5 million homes and fix the housing crisis we’ve inherited – and get working people on the housing ladder.”

“For decades the status quo has failed them and it’s time to level the playing field.”

“Today we’re taking urgent action to make the system simpler, fairer and more cost effective, so smaller housebuilders can play a crucial role in our journey to get Britain building.”

4.108 This significant change to the planning system which focuses heavily on support SME Housebuilders who have faced difficulties for decades being disproportionately affected by policy.

4.109 The applicant, being a local SME, strikes a chord with the Governments direction of seeking to support SMEs and help deliver choice, through high quality developments. Whilst it is acknowledged that this application is for major development, it is proposed to be delivered by a local SME Housebuilder, who is passionate about the delivery of high quality, sustainable new homes, making a significant contribution to GBC’s housing supply.

STATEMENT OF COMMUNITY INVOLVEMENT

- 5.1 The Planning and Compulsory Purchase Act 2004 came into force in September 2004. One of the central purposes of the Act was to improve community involvement in the planning process. The Government has made it clear in the guidance accompanying the legislation that developers should be encouraged to undertake public consultation.
- 5.2 Esquire Developments is committed to community consultation which is enshrined within the NPPF (2024) Paras 40-43. Para 40 outlines the importance of public consultation and states that: *“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”*
- 5.3 The Planning Practice Guidance (PPG) offers further guidance in respect of pre-application consultation, with Reference ID: 20-001-20190315 encouraging engagement with the community where it will add value to the process and the outcome of planning applications.
- 5.4 The Council adopted a Statement of Community Involvement in 2019, which Esquire Developments has sought to adhere to. The Statement of Community Involvement seeks to ensure active, meaningful and continued involvement of everyone including local communities and stakeholders in the planning systems. It outlines the Council’s standards for community involvement in the planning system.

i) Pre-Application and Community Engagement

- 5.5 As part of the preparation of the planning application, Esquire Developments has undertaken a programme of pre-application and community engagement. These measures have been used in shaping the final proposals.
- 5.6 The following Section details the pre-application engagement that has taken place including:
- Pre-Application engagement with Gravesham planning department;
 - Pre-application engagement with KCC Highways; and
 - Public Consultation in the form of a Public Exhibition

Pre-Application Engagement with Gravesham Planning Department

- 5.7 A pre-application meeting was held between Esquire Developments and GBC on the 15th April 2025. At the time of writing this planning statement, we are still awaiting a formal written response.

Public Exhibition

- 5.8 A Public Exhibition was held to present the emerging proposals to the local community. An invitation was sent to each property in Istead Rise (approx. 1,600 residences). The leaflet (**Appendix C**) provided details of the exhibition, including how to comment on the proposals.
- 5.9 The public exhibition was held on the 2nd June 2025 (1pm – 7pm) at Istead Rise Scout Hut, Downs Road (located opposite Istead Rise Primary School, and adjacent to the Site).
- 5.10 Approximately 250 individuals attended the exhibition, representing circa 15% turnout of those who received an invite (of the 1,600 leaflets directly canvassed – albeit the event was advertised further afield online also).
- 5.11 A copy of the exhibition boards is available at **Appendix D**. A copy was also made available on the Esquire Consultation website (<https://www.consult-esquire.com/>) with a comment box requesting feedback. A dedicated email address was also set up to receive comments (isteadrise@esquiredevelopments.com). The consultation feedback form was available to fill in on the day of the event with 5 questions. A copy of this form is available at **Appendix E**. The deadline for response was the 20th April 2025, however the website and email address have remained live to date.
- 5.12 A total of 36 responses were received to the consultation representing a 14% response rate of those that attended the exhibition. Of the responses received 29 were collected as paper feedback forms on the day of the exhibition, and 7 via email.
- 5.13 The responses received have been reviewed and analysed and are summarised as follows:

Topic	Summary of Comments	Response
Principle of Development and Housing Mix	<ul style="list-style-type: none"> • Object to the development of this site • Need for housing which must be located somewhere • Other suitable sites • Brownfield sites within Gravesend should be built on first • The proposals look considered and attractive • Positive if technical matters are dealt with • Positive to see a mix of housing sizes 	The proposals include a range of 1-5 bed properties including 50% affordable housing. The mix of dwellings has been market led with the accommodation providing unit types to meet local needs. There are homes that are attractive as starter homes, for downsizers and for larger families.

Topic	Summary of Comments	Response
	<ul style="list-style-type: none"> The houses will not be affordable for local people 	
Highways	<ul style="list-style-type: none"> Highways concerns Lack of public transport Additional cars on Downs Way Impact of additional cars on air quality Lack of parking proposed Access is not safe 	<p>A Transport Statement has been provided with this application that confirms the forecasted trip rates and sets out that the proposed development will have a negligible impact on the surrounding highway network.</p> <p>A Road Safety Audit of the proposed access design has been undertaken. All matters raised have been fully addressed and therefore the access is confirmed to be safe and suitable.</p>
Lack of Infrastructure	<ul style="list-style-type: none"> No capacity at local school No capacity at GPs Public services already stretched 	<p>A S106 Agreement will be entered into to mitigate the impact of the development on local infrastructure.</p> <p>In discussions with the KCC Education team we have sought to understand the impact of any future development on the local primary and secondary schools. On this basis, the development of up to 160 dwellings would result in the requirement for an additional 45 primary school places and 32 secondary school places.</p> <p>There is presently capacity within the primary school provision. However, is expected to be operating over-capacity within the next three years based on forecasted population growth. This position continues to worsen across the next 5 years even without the development coming forward.</p>

Topic	Summary of Comments	Response
		<p>The data indicates that there is currently a shortfall in capacity across the secondary school provision by a substantial amount and far greater than this development. This reflects a wider strategic matter and a position that KCC Education is required to address for both the shorter and longer term.</p> <p>If this proposal was to be granted planning permission, there would be a requirement for a contribution to KCC Education to ensure that the demand generated as part of this development can be accommodated within the local education provision.</p>
Green Belt	<ul style="list-style-type: none"> • Green Belt must be protected. • Site is not considered to be Grey Belt • Proposal contradicts the principles of the Green Belt • Provides a buffer between the villages of Istead Rise and New Barn • Green Belt plays a crucial role in tackling climate change and flooding 	<p>This Planning Statement provides a full assessment of the Site against national Green Belt policy and confirms that the Site is Grey Belt land.</p> <p>The proposed development complies with Paragraph 155 of the NPPF and is therefore not considered inappropriate development in the Green Belt.</p>
Biodiversity	<ul style="list-style-type: none"> • Impact on wildlife • The ecology proposals are well planned 	<p>A full suite of Ecology surveys will be submitted in support of the application.</p> <p>The proposals have sought to minimise impacts on biodiversity and subject to the implementation of</p>

Topic	Summary of Comments	Response
		appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the proposals will result in any significant harm.

**PLANNING
ANALYSIS**

6.1 This section of the statement sets out of an assessment of the proposed development against the relevant planning policy and guidance. A topic-based approach is taken in respect of the prevailing planning considerations, with due regards to the National and Local planning policies detailed in Section 4 of this Statement.

6.2 In compiling this application submission, it has been possible to identify the following over-arching planning considerations:

- i) Principle of Development:
 - a) Green Belt
 - b) Harm to the Green Belt
 - c) Very Special Circumstances
 - d) Suitability and Accessibility of the Site
 - e) Definition of Sustainable Development
- ii) Residential Development:
- iii) Landscape Impact and Open Space:
- iv) Transport and Traffic:
- v) Flooding and Drainage:
- vi) Ecology:
- vii) Arboriculture:
- viii) Archaeology:
- ix) Heritage:
- x) Air Quality:
- xi) Contamination:
- xii) Section 106 Heads of Terms.

i) Principle of Development

6.3 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Paragraph 10 retains the presumption in favour of sustainable development at the heart of the Framework. Paragraph 11d) continues to require that planning permission be granted where there are no relevant development plan policies or the policies most important to determining the application are out of date.

6.4 The GBC Core Strategy was adopted in 2014. However, a shortfall of sites against the housing requirement was recognised at the Examination and the Plan was only found 'sound' on the basis an early review of housing needs was undertaken. This included a commitment to undertake a review of Green Belt boundaries.

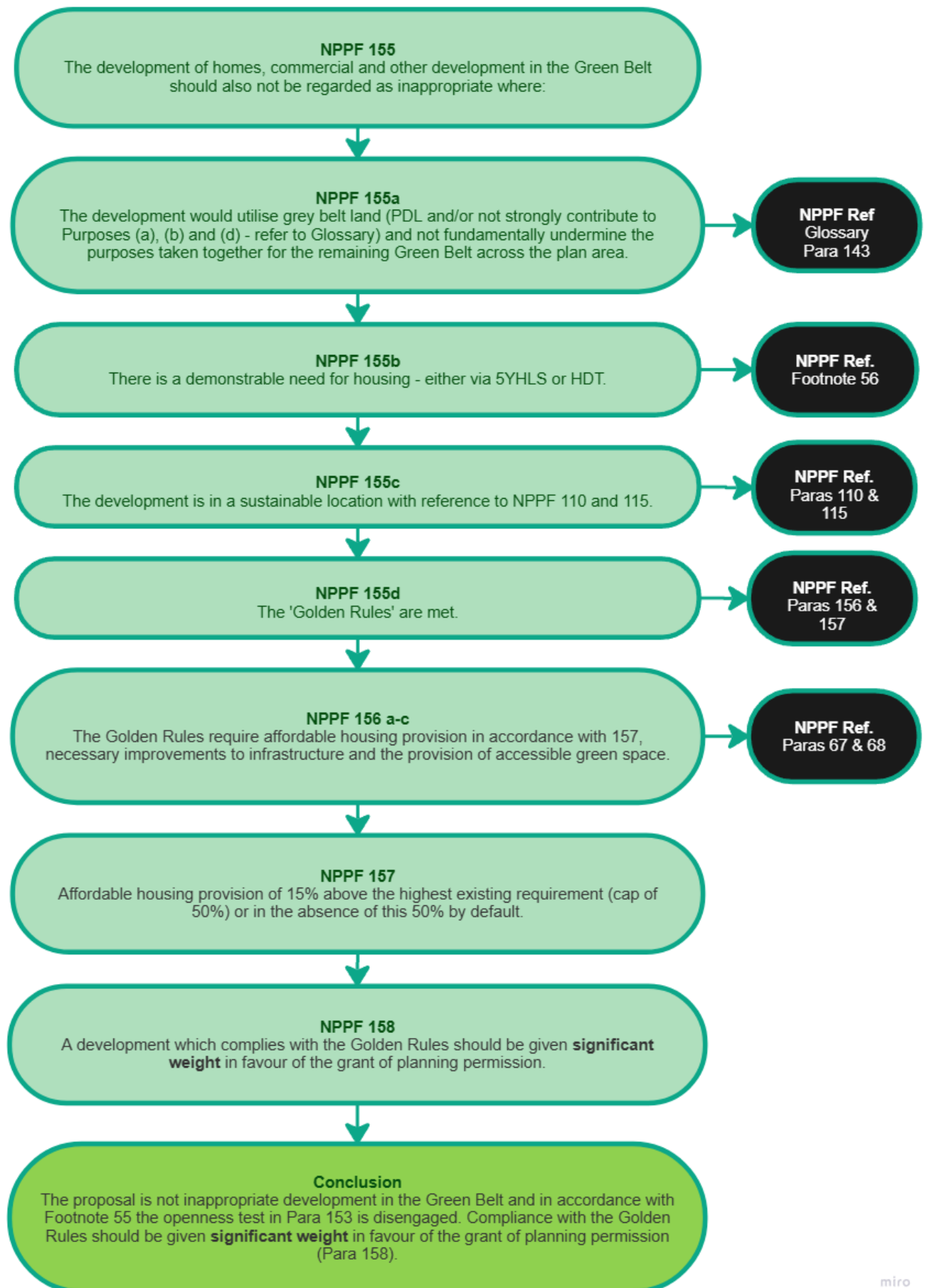
- 6.5 Progress on the emerging Local Plan Core Strategy Partial Review has continued to be delayed. The Local Development Scheme (February 2025) indicates that the Regulation 19 Local Plan will be published for consultation in July 2025, with Examination in July 2026 and adoption in December 2026. The Regulation 19 Plan was not published for consultation in July 2025 and therefore it is likely that the LDS timetable will continue to be delayed as a result.
- 6.6 The NPPF (2024) published changes to the Standard Method Calculation and the five year housing requirement for Gravesham is 3,360 dwellings. This equates to 672 dwellings per annum. GBC cannot currently demonstrate a Five Year Housing Land Supply, with only 3 years' worth of deliverable housing supply according to the Five-Year Land Supply Statement 2024 –2029 (February 2025). This represents a shortfall of 1,603 dwellings over the 5-year period.
- 6.7 The latest confirmed Housing Delivery Test (HDT) confirmed that against a need of 1,789 dwellings only 1,056 were delivered resulting in a HDT measurement of 59% (as confirmed by MHCLG in December 2024). There is persistent under-delivery which has resulted in a significant shortfall of housing within the Borough.
- 6.8 Paragraph 11 of the NPPF (2024) states that planning permission should be granted unless either Limb i) or ii) is triggered. Limb i) directs that if the application of policies in the NPPF that protect areas or assets of particular importance (Footnote 7) provides a “strong” reason for refusing the development, planning permission should not be granted.

a) Green Belt

- 6.9 This Site is located wholly within the Green Belt, as identified on the Local Plan Proposals May (1998). It is therefore necessary to assess whether, in accordance with Paragraph 11(d)(i), the Green Belt “provides a strong reason for refusing the development proposed”.
- 6.10 Paragraph 153 of the NPPF (2024) requires local planning authorities to give substantial weight to harm to the Green Belt, including harm to its openness. Footnote 55 clarifies that this is other than in the case of development on previously development or grey belt land, where development is not inappropriate.
- 6.11 Inappropriate development in the Green Belt is harmful by definition, except in very special circumstances. Paragraph 154 and 155 set out a number of exceptions to this. The proposed development does not meet any of the exceptions listed in Paragraph 154 but does accord with the criteria set out in Paragraph 155.

Appropriate Development

- 6.12 The publication of the revised NPPF in December 2024 introduced the new concept of “Grey Belt” at Paragraph 155. This confirms that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where all of 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.**
- 6.13 The flow chart below illustrates the steps required to determine whether a site is appropriate development in the Green Belt in relation to the relevant paragraphs of the NPPF.



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6.14 Following publication of the NPPF in December 2024, a number of planning applications have been approved either locally or at Appeal on the basis the sites constitute Grey Belt land.

6.15 One of the most proactive authorities in this regard is Basildon Borough Council with 5no. planning applications on Green Belt sites being reported to Planning Committee with a recommendation for approval. All 5no. sites have been concluded by Officer's to be appropriate development on Grey Belt land.

1. **24/00762/OUT** – Land West of Laindon Road, Billericay – Outline planning application for up to 250 homes (Committee 8th January 2025).
2. **23/01551/OUT** - Land to the South of Wash Road, Laindon – Hybrid planning application for up to 400 residential dwellings and a community facility (Committee 12th January 2025).
3. **19/01725/OUT** – Land North of London Road, Billericay – Outline application for up to 480 new homes (Committee 26th February 2025).
4. **24/01098/OUT** – Land West of Castledon Road, Wickford – Outline application for up to 97 new homes (Committee 12th March 2025)
5. **5/2022/2736/LSM** – Land at Round House Farm – Outline application for up to 155 new homes (Committee – 19th March 2025)
6. **24/00980/OUT** – Land South of London Road, Billericay – Outline application for 130 dwellings (Committee – 6th August 2025)
7. **23/01018/OUT** – Land East of Bakers Farm Close, Wickford – Outline application for 250 dwellings (Committee 5th November 2025)

6.16 Each of the Committee Reports provides a detailed assessment of each site and the proposed development against the relevant paragraphs of the NPPF with regards to Grey Belt. All 5no. follow the same structure with regards to the assessment, which follows the steps outlined in the flow chart above. This structure also closely mirrors that of the Inspector for the Land off Chapel Lane Appeal (APP/V4630/W/24/334724 – **Appendix F**), which was granted on the 13th January 2025. It is noted that this decision was issued after the Laindon Road Committee Report was published, however this endorses BBC's interpretation of the revised NPPF, and the steps required to undertake the Grey Belt analysis and appropriateness tests.

6.17 A subsequent Appeal Decision at Land at Former Court Lane Nurseries, Hadlow (APP/H2265/W/24/3346228 (21st February 2025) – **Appendix G**) further cements the position with regards to Grey Belt analysis and the appropriateness test.

Grey Belt Analysis

6.18 Grey Belt is defined in Annex 2 of the NPPF (2024) as:

Grey Belt – For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) in 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.

6.19 To determine whether the development meets the exception set out in Paragraph 155, the first step is to confirm whether the Site constitutes Grey Belt land by assessing the contribution to Purposes (a), (b) and (d) of the Green Belt (Paragraph 143):

- **Purpose (a)** - to check the unrestricted sprawl of large built-up areas;
- **Purpose (b)** - to prevent neighbouring towns merging into one another;
- **Purpose (d)** – to preserve the setting and special character of historic towns

Green Belt Study 2018

6.20 GBC’s Evidence Base includes a Green Belt Study 2018 and located the Site within Parcel 13 which covers approximately 800 hectares of land between Istead Rise and New Barn. The Site is located to the north east of this parcel, adjoining the defined settlement boundary of Istead Rise.

6.21 The Green Belt Study (2018) assesses each parcel against Purposes (a), (b) and (c) of Paragraph 143 of the NPPF. The Parcels are not assessed against Purposes (d) and (e) as all Green Belt land is considered to make an equal contribution to these purposes.

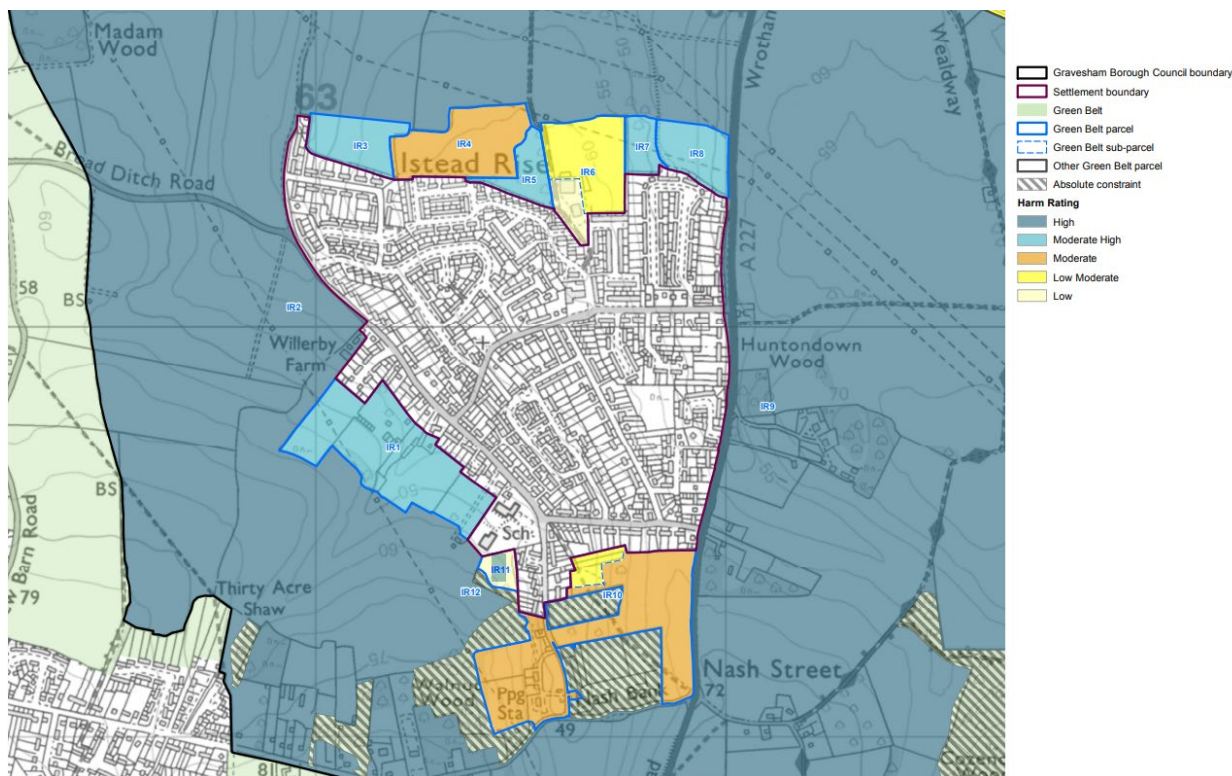
6.22 The assessment of Parcel 13 is outlined in the table below:

Parcel	Purpose (a)	Purpose (b)	Purpose (c)
13 Istead Rise and New Barn Gap	Minimal/no contribution	Minimum/no contribution	Significant Contribution

6.23 As set out in the definition, only Purposes (a), (b) and (d) are relevant when considering Grey Belt land. The table above demonstrates that Parcel 13 makes a ‘minimal/no contribution’ to Purpose (a) and (b) and has not been assessed against Purpose (d) as all Parcels make an equal contribution.

Gravesham Stage 2 Green Belt Study 2020

6.24 The Gravesham Stage 2 Green Belt Study (2020) includes this Site within Parcel 1R1.



- 6.25 The Stage 2 Study further reinforces the conclusion that the Site is Grey Belt, as the assessment of the relevant Purposes for Grey Belt (Purposes (a), (b) and (d)), concludes that the parcel makes 'limited/no contribution' (Purpose C not relevant for the assessment of Grey Belt) to those Purposes.

Green Belt Purpose	Parcel IRI
Purpose (a)	Limited/no contribution
Purpose (b)	Limited/no contribution
Purpose (c)	Relatively significant
Purpose (d)	Limited/no contribution
Purpose (e)	Equal contribution

- 6.26 Accordingly, both the 2018 and 2020 Local Plan Evidence Base accept the parcels within which the Site sits do not make a strong contribution to the relevant purposes of the Green Belt.

Stantec Landscape and Visual Assessment and Green Belt Assessment

- 6.27 A Landscape and Visual Appraisal and Green Belt Assessment (LVGBA, November 2025) has been submitted in support of this planning application. The report includes Stantec's assessment of the Site's contribution to the Green Belt (Chapter 9), which is a focused site-specific review, compared to the Council's Green Belt reviews, which focus on larger Green Belt parcels. A summary of the Site's contribution can be found below, the full assessment can be found at Page 43 (Table 4) of the report.

	Purpose (a) Harm Rating	Purpose (b) Harm Rating	Purpose (d) Harm Rating
Land at Rose Farm, Istead Rise	Weak	None	None

- 6.28 The report then goes onto consider the matter of ‘Grey Belt’ (Chapter 9.1.6). It is concluded that the criteria set out in the NPPF (2024) are met and therefore the Site is considered to comprise ‘Grey Belt’ land. In short, the Site does **not** perform strongly against any of the Green Belt purposes and exhibits at least one of the features listed in the policy (specifically the Site makes no contribution to preventing neighbouring towns from merging and no contribution to preserving the setting and special character of historic towns).

Summary of the Site’s Contribution to the Relevant Green Belt Purposes

➤ Purpose (a) - to check the unrestricted sprawl of large built-up areas

- 6.29 The Green Belt guidance published by MHCLG in February 2025 confirms Purpose (a) “*relates to the sprawl of large built-up area. Villages should not be considered large built-up areas*”. Istead Rise is a village and therefore does not constitute a large built-up area. Purpose (a) specifically relates to the unrestricted sprawl of large built-up areas. Purpose (a) is therefore not applicable.
- 6.30 In addition to the above, the findings of the Council’s Green Belt Study 2018 and Stage 2 Green Belt Report 2020 both conclude that the Green Belt parcels within which the Site lies (Parcels I3 & IRI) make ‘limited/no contribution’ to Purpose (a).
- 6.31 The Stage 2 Green Belt Study 2020 confirms that following in relation to Purpose (a) “*Istead Rise is a settlement which is located close enough to the large built-up area of Gravesend to have some relationship with it, but land on this side of the settlement does not lie in the gap between the two and so does not contribute to this purpose*”.
- 6.32 Stantec agree with these findings. They also conclude that due to the Site’s underlying landform, with the lower-reaches of this valley slope already perceptually forming part of the settlement of Istead Rise. The proposed development will extend the built-up area of Istead Rise in a coherent manner and in any event is contained by the upper slopes and crest of the valley side, thereby confining the built-up area.
- 6.33 In conclusion, this Site makes **no contribution** to Green Belt Purpose (a)

➤ **Purpose (b) - to prevent neighbouring towns merging into one another**

- 6.34 The Green Belt guidance published by MHCLG in February 2025 confirms that Purpose (b) relates to the merging of towns not villages. Istead Rise is a village and therefore this purpose is not applicable.
- 6.35 The findings of the Council's Green Belt Study 2018 and Stage 2 Green Belt Report 2020 both conclude that the Green Belt parcels within which the Site lies (Parcels I3 & IRI) make 'limited/no contribution' to Purpose (b).
- 6.36 The Stage 2 Green Belt Study 2020 confirms that in relation to Purpose (b) *"This land does not lie in a gap between neighbouring towns and does not make any contribution to this purpose."*
- 6.37 The LVIA (Stantec) confirms that fundamentally Istead Rise does not constitute a town, and the Site does not lie in a gap between towns, and accordingly the extent to which the Site can contribute to this Purpose is diminished. The LVIA concludes that the existing built development to the north, and east of the Site provide a sense of physical containment. While there would be a minimal physical reduction in the separation distance between Istead Rise and New Barn, if this area was developed, crucially this developed area would sit below the crest and upper slope of the valley side. As such, there would be no perceived reduction in the separation distance between Istead Rise and New Barn.
- 6.38 In conclusion, this Site makes **no contribution** to Green Belt Purpose (b)

➤ **Purpose (d) - to preserve the setting and special character of historic towns**

- 6.39 The Green Belt guidance published by MHCLG in February 2025 confirms that Purpose (d) relates to historic towns not villages. Istead Rise is a village and therefore this purpose is not applicable.
- 6.40 The findings of the Council's Green Belt Study 2018 and Stage 2 Green Belt Report 2020 both conclude that the Green Belt parcels within which the Site lies (Parcels I3 & IRI) make 'limited/no contribution' to Purpose (d).
- 6.41 The Stage 2 Green Belt Study 2020 confirms that following in relation to Purpose (d) *"Land does not make a significant contribution to the setting of any historic town."*
- 6.42 The LVIA (Stantec) confirms that the Site doesn't contribute to or form the setting or special character of a historic town.
- 6.43 In conclusion, this Site makes **no contribution** to Green Belt Purpose (d).
- 6.44 In light of the above, it is demonstrated that the Site does not strongly contribute to Green Belt Purposes (a), (b), (d) as set out in Paragraph 143 of the NPPF (2024). Additionally, there are no

policies in Footnote 7 (other than Green Belt), which protect areas or assets of particular importance, relevant to this site.

- 6.45 Therefore, the Site constitutes Grey Belt land as defined in Annex 2: Glossary of the NPPF 2024. The next step is to confirm that all the criteria set out in Paragraph 155 are met.

Paragraph 155 Criteria

- 6.46 In order to demonstrate how the Site and the proposed development accords with Paragraph 155, each of these criteria (a-d) is taken in turn.

Paragraph 155 Criteria	Assessment of the Site and Development Proposals
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	<p>This Site does not strongly contribute to Purposes (a), (b) or (d) and therefore constitutes 'Grey Belt'.</p> <p>The Site is perceived to be physically contained by existing built development to the north and east. The built form to the north defines the settlement edge.</p> <p>The physical characteristics of the Site's underlying landform, with the lower-reaches of the valley slope already perceptually forming part of the settlement of Istead Rise. Development will extend the built form of Istead Rise in a coherent manner and would be contained by the upper slopes and crest of the valley side.</p> <p>Redevelopment of the Site with residential development of the scale proposed is unlikely to result in definitional, spatial and perceptual harm to the openness of the Green Belt. Therefore, the proposed development will not undermine the purposes of the Green Belt (taken together) across the area of the plan as a whole.</p> <p>Criterion (a) is met</p>
b) There is a demonstrable unmet need for the type of development proposed	<p>Gravesham does not currently have an up-to-date Local Plan and is unable to demonstrate a 5-year housing land supply (3 years as of February 2025).</p> <p>The latest Housing Delivery Test measurement (published in December 2024) indicates that the Council only delivered 59% of their housing requirement.</p> <p>These factors identify a demonstrable unmet need for both market and affordable housing within the Borough that is unlikely to be met in the short to medium term.</p> <p>Criterion (b) is met</p>

Paragraph 155 Criteria	Assessment of the Site and Development Proposals
<p>c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework</p>	<p>The Site is in a sustainable location located within walking distance of a range of services, facilities and transport nodes, which can be accessed via continuous footway provision along Downs Road. This offers future residents and visitors a genuine choice of sustainable transport modes. This will be further encouraged through the implementation of a Travel Plan and the proposed improvements to surrounding pedestrian infrastructure.</p> <p>The proposed vehicular access has been demonstrated to be safe and suitable for future users. The access has been subject to a Stage 1 Road Safety Audit. All matters raised have been fully addressed and the access has been demonstrated to be safe and suitable.</p> <p>Pedestrian access is provided via the main Site access, the emergency access via Longwalk, and via a dedicated pedestrian/cycle connection between 30 and 34 Downs Road. There is a high level of existing pedestrian infrastructure accessible from the Site. In addition, there are a number of PRow within the vicinity of the Site providing leisure routes to the surrounding rural countryside.</p> <p>The Site is therefore entirely suitable for residential development from a transport and access perspective, having regard to national and local transport planning policy.</p> <p>Criterion (c) is met</p>
<p>d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in Paragraphs 156-157</p>	<p>GBC's adopted Local Plan requires affordable housing provision of 35% in rural areas. The 'Golden Rules' require 15 percentage points above the highest existing affordable housing requirement.</p> <p>The proposed development includes the provision of 50% affordable housing in accordance with the 'Golden Rules'.</p> <p>If required, any necessary improvements to local or national infrastructure will be delivered as part of the development proposals.</p> <p>Substantial areas of public open space are proposed on Site, increasing recreational and play opportunities for new and existing residents.</p> <p>This Site has historically been in private ownership. The proposed development will enable public access to the amenity areas which was previously inaccessible.</p> <p>Areas of play will be provided within the open space which offers recreational opportunities for children from the proposed development and the wider area.</p>

Paragraph 155 Criteria	Assessment of the Site and Development Proposals
	Criterion (d) is met

- 6.47 Paragraph 159 states that improvements to green spaces required as part of the ‘Golden Rules’ to contribute positively to the landscape setting of the development, support nature recovery and meet local, or were non-existent, national standards for green space provision. Whilst only at Outline stage, the Illustrative Landscape Masterplan and Parameter Plan demonstrate how the design will be landscape led and will contribute positively to the landscape setting. In addition, a substantial level of green space is provided across the Site which will provide future residents will access to publicly accessible green space. The delivery of Biodiversity Net Gain (BNG) will support nature recovery by providing an uplift in biodiversity from the baseline position of the Site.
- 6.48 Paragraph 158 states that “A development which complies with the Golden Rules should be given significant weight in favour of the grant of planning permission.”
- 6.49 As demonstrated in the table above the proposed development meets **all** the criteria listed in Paragraph 155 and therefore **is not** regarded as inappropriate development in the Green Belt. As such relevant test for granting planning permission is no longer Paragraph 153 as this applies only to inappropriate development in the Green Belt. Footnote 55 confirms that the requirement as set out in Paragraph 153 to “ensure that substantial weight is given to any harm to Green Belt, including harm to its openness” **does not apply**. The Green Belt guidance published by MHCLG (updated in February 2025) reiterates this point confirming that “Footnote 55 to the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness”.
- 6.50 Therefore, the relevant test for granting planning permission is Paragraph 11(d)(ii), which sets out a presumption in favour of granting planning permission.

b) Harm to the Green Belt

- 6.51 Whilst it is considered that the proposed development would utilise Grey Belt land and the tests set out in Paragraphs 155 and 156-159 are met, it may be that an alternative view is taken, and the proposals are considered against the requirements of Paragraph 153. Whilst substantial weight is given to any harm to the Green Belt, including its openness, it is important to consider the contribution the Site makes to the purpose and function of the Green Belt.
- 6.52 A full assessment of potential harm to the Green Belt and Very Special Circumstances arising from the development has been undertaken.

- 6.53 The table below outlines the conclusions of the Council's Green Belt Study 2018 and Green Belt Study 2020 and the site-specific Green Belt Assessment prepared by Stantec (2025).

Parcel	Purpose (a)	Purpose (b)	Purpose (c)	Purpose (d)	Purpose (e)
Parcel I3 (2018)	Minimal/no contribution	Minimal/no contribution	Significant Contribution	Equal	Equal
Parcel IRI (2020)	Limited/no contribution	Limited/no contribution	Significant	Limited/no contribution	Equal
Stantec LVIA	Weak	None	Moderate	None	n/a

- 6.54 The above demonstrates that the Green Belt parcels the Site sits within, and the Site (when taken in isolation) perform poorly or make an equal contribution to 4 out of the 5no. Green Belt Purposes.
- 6.55 The conclusions of the Stantec's site specific LVIA mirror that of the Council's Green Belt Studies (2018 & 2020) in relation to Purposes (a), (b), (d) and (e). The difference in opinion regarding Purpose (c) is minor, with the Green Belt Study 2018 rating the harm slightly higher, however relates to a far larger parcel of land.
- 6.56 Stantec acknowledge that the Site lies within the countryside and whilst it is not an extensive tract of land it is perceived as countryside. Nonetheless, the Site is considered to be of low landscape value as: the Site is generally not of noteworthy scenic beauty, given its proximity to the existing built development, the Site does not form part of the historic landscape, the Site does not currently afford the opportunity for public recreation, and the Site is not covered by any landscape designations.
- 6.57 The Green Belt Study 2020 concludes that Parcel IRI makes a 'moderate' contribution. The overall contribution appears to have been elevated on the basis of the contribution of the parcels make to Purpose (c), without recognising that the limited contribution the parcels make to the other 4no. Purposes.
- 6.58 In conclusion, the Green Belt parcels within which this Site sits perform poorly overall and the Site itself makes a limited contribution to the Purposes of the Green Belt, the harm resulting from the proposed development is therefore concluded to be **low**.

c) Very Special Circumstances

- 6.59 For the reasons set out above, the Site is considered to be Grey Belt and is therefore not inappropriate development in the Green Belt in accordance with Paragraph 153 and 155 of the NPPF

(2024). However, should a different conclusion be reached, a number of Very Special Circumstances (VSCs) have been identified, which clearly outweigh any perceived harm to the Green Belt.

6.60 The VSCs are detailed below:

I. Delivery of Much Needed Housing

- 6.61 GBC's most recent Five-Year Housing Land Supply Statement (2024 – 2029) confirms that the Borough is unable to demonstrate a 5-Year Housing Land Supply. The Council have calculated a requirement of 3,360 new homes over the 5-year period (new Standard Method), which equates to 672 dwellings per annum. However, GBC can only demonstrate a **3 years'** worth of deliverable housing sites as of February 2025, which represents a shortfall of 1,603 dwellings over the 5-year period.
- 6.62 The latest Housing Delivery Test (HDT) results confirmed that against a need of 1,789 dwellings only 1,056 were delivered resulting in a HDT measurement of 59% (as confirmed by MHCLG in December 2024). This highlights persistent under-delivery which has resulted in a significant shortfall of housing within the Borough.
- 6.63 In addition, the Local Plan is out-of-date having been adopted over 10 years ago. Whilst GBC is in the process of preparing a new Local Plan, this has been in the making since 2018. The Borough is extremely constrained by Green Belt with 78% of the Borough designated as Green Belt and the Council itself recognises that the Borough's development needs cannot be met from the existing urban areas and settlements inset from the Green Belt. As such GBC undertook 2no. Green Belt Studies as part of the Evidence Base and the Regulation 18 Local Plan Partial Review included a number of sites within the Green Belt which could contribute towards meeting the Borough's development requirements.
- 6.64 A number of recent Appeal Decisions have been referred to in order to establish the weight that should be attributed to this matter in the planning balance. In the Appeal at Little Chalfont, Buckinghamshire (Appendix H) both main parties and the Inspector attributed "very substantial" weight to the delivery of market and affordable housing within the Green Belt.
- 6.65 The Inspector for the Appeal at Land off Bullens Green Lane, Colney Heath (Appendix I) attributed 'very substantial weight' to the delivery of market housing stating that *"From the evidence presented in relation to the emerging planning policy position for both authorities, this is not a position on which I would envisage there would be any marked improvement on in the short to medium term. I afford very substantial weight to the provision of market housing which would make a positive contribution to the supply of market housing in both local authority areas."*

- 6.66 Furthermore, in the Secretary of State's (SoS) recent decision at Chiswell Green Lane, St Alban's in Hertfordshire (Appendix J), the delivery of both market and affordable housing in the Green Belt attracted "very substantial" weight. The decision states that *"The Secretary of State agrees with the Inspector that there is a very substantial need for housing in the district which is persistently going unmet, that the Local Plan housing requirement is hopelessly out of date, and that, using the standard method, the Council can demonstrate just a two-year housing land supply at best..., the Secretary of State agrees with the Inspector that in the context of such a great housing need, very substantial weight should be attached to the proposed housing."* (paragraphs 28-29).
- 6.67 Giving due regard to the national policy context and the lack of 5-year housing land supply housing alongside the continuing absence of an up-to-date Local Plan in an area highly constrained by Green Belt, it is clear that the proposed development will make an important contribution to the significant housing need in the Borough. In addition, the Site would be delivered within 5 years and will therefore contribute towards GBC's 5 year housing land supply, delivering market housing in the short term. In accordance with Paragraph 158 of the NPPF (2024) **very substantial weight** is given to this matter.

2. Delivery of Affordable Housing

- 6.68 The Written Ministerial Statement – Building the Homes We Need (30th July 2024) indicates that affordable housing delivery is one the Government's main priorities stating that *"the Government are committed to the biggest growth in social and affordable housebuilding in a generation"*.
- 6.69 The affordable housing need in the Borough is significant. The Housing Development Strategy (2024-2028/29) confirms that Gravesham has some of the highest housing needs in Kent with 870 people on the Council's Housing Register in April 2024 and 230 people in temporary accommodation in January 2024 (the highest in Kent). The Council's website also provides details of new build affordable housing handovers which confirms that since April 2020 only 107 new affordable houses have been delivered. The Housing Development Strategy (2024-2028/29) also confirms that of the total housing delivered in the Borough (circa 250 dwellings per annum) the level of affordable delivered is below 30%, primarily due to viability challenges associated with lower values in the town centre.
- 6.70 The Housing Development Strategy (2024-2028/29) includes an objective *"to identify, secure, contribute and influence the setting up of a robust pipeline to achieve the target of primarily affordable 1,000 homes to be delivered or started on site in the next 5 years."* This is a significant target, especially considering only just over 10% of that figure has been delivered in the Borough over the last 5 years.
- 6.71 This persistent underperformance is driven by consistently low delivery rates with rising numbers of households on the Housing Register and increasing reliance on temporary accommodation. The scale of this shortfall, coupled with the growing backlog of unmet need, highlights a systemic failure to deliver the affordable housing required to support the Borough's residents.

- 6.72 The Appeal decisions at Chiswell Green and Little Chalfont highlighted in the previous section are also relevant to this matter and confirm that ‘*very substantial weight*’ should be attributed to the delivery of affordable housing. In addition, the *Vistry Homes Ltd v Secretary of State for Levelling Up, Housing And Communities & Ors* Judgement, Mr Justice Holgate states:

157. “If a decision-maker were to reduce the weight which he would otherwise give to a 40% provision of affordable housing because the development will provide the level of housing required by the development plan, that would also be objectionable, certainly in the absence of any logical explanation. The decision-maker should be assessing how the developer’s contribution of affordable housing stands in relation to inter alia the justification in the development plan for the level of affordable housing required by the policy. Key considerations could include the level and nature of the need for affordable housing in the district and any shortfall in delivery.”

- 6.73 The proposed development will accord with the ‘Golden Rules’, delivering 50% affordable housing. As confirmed above the Site would be delivered within 5 years and will therefore contribute towards rectifying the persistent shortfall of affordable homes in the short term. Given the poor record of delivery of affordable homes within the Borough, **very significant weight** is given to this matter.

3. Green Belt Performance

- 6.74 As discussed previously, the Site makes a limited contribution to the Purposes of the Green Belt when taken as a whole and the harm resulting from the proposed development is concluded to be **low**.
- 6.75 Additionally, the Site comprises ‘Grey Belt’ land and the ‘Golden Rules’ are met, meaning the proposed development is not inappropriate development in the Green Belt.
- 6.76 When taking into account the Site’s specific Green Belt performance and the Council’s own evidence base **very significant weight** is given to this matter.

4. Economic Benefits

- 6.77 The proposed development will deliver a range of economic benefits during construction phase and once the homes are occupied the new residents will help build a strong and competitive economy. The NPPF seeks to build a strong, competitive economy with Paragraph 85 confirming “*that significant weight should be placed on the need to support economic growth and productivity*”.
- 6.78 The Home Builders Federation (HBF) report ‘The Economic Footprint of Home Building in England and Wales’ (September 2024) states that housebuilding plays an important role in generating economic output. New housebuilding generated £53.3 billion of economic output in Britain’s

economy in 2023, 87% of which was contributed through private sector housing. The housebuilding industry also supports a significant employment base and contributes to public finances through the tax revenues generated. In addition to delivering much needed housing and supporting employment across a range of sectors of the economy, house building also provides a wide range of other economic benefits for local communities through financial and other contributions made through the planning system. The housebuilding industry plays an important role in stimulating further demand and economic activity through its extensive supply chains and networks, which in turn generates additional output, employment, spending and tax contributions.

- 6.79 The proposed development will deliver economic benefits associated with the construction of up to 154 new dwellings. Additional jobs will be created throughout the construction process, with increased investment in tradesmen and suppliers. New housing will also help support local shops and businesses and increase Council Tax receipts for GBC. **Significant positive weight** has been given to this matter.

5. Environmental Benefits

- 6.80 The proposed development will deliver ecological enhancements through the delivery of 10% BNG.
- 6.81 Whilst the NPPF does not set a specific target for BNG, the Environment Act requires 10% net gain in biodiversity, measured using the Biodiversity Metric.
- 6.82 Recent case law confirmed the weight that should be given to BNG. In the case of *Vistry Homes Ltd v Secretary of State for Levelling Up, Housing and Communities & Ors (Rev1)* [2024] The Hon. Mr Justice Holgate, at paragraph 155 and 156 states:

“155. It is difficult to see how logically a decision-maker could give no weight at all to, for example, the provision of 10% BNG because that equated to the 10% requirement in sched. 7A. The fact that such a requirement is imposed by legislation is simply a mechanism for ensuring that a wide range of developments contribute to the collective effort of improving biodiversity in England. It does not alter the nature or purpose of the improvement in biodiversity which is provided, or the underlying justification for the requirement to reverse a national decline in biodiversity over many years.

156. It also follows that where a development would provide BNG of 20%, a decision-maker is not entitled to say that only that part of the BNG which exceeds 10% can qualify as a benefit in deciding whether to grant planning permission.”

- 6.83 As set out previously the proposed development will deliver 10% BNG through habitat creation and enhancement measures on Site and if necessary, purchasing of a small number of biodiversity credits.

- 6.84 As outlined above the fact that the 10% uplift in BNG is required by legislation has no bearing on the weight given to this provision, therefore **significant positive weight** has been given to this matter.

6. Open Space

- 6.85 The proposals incorporate large areas of open space in the western and southern parts of the Site as shown on the Parameter Plan and Illustrative Site Layout. Additional areas of open space are shown on the Illustrative Layout to provide incidental amenity areas within the developed area.
- 6.86 Whilst the Site currently comprises paddocks and agricultural fields, it is not publicly accessible. The proposed development will open these areas of green space up to the public providing new amenity, natural and semi natural green spaces and an area of equipped play for children. The open space proposals area of wider public benefit providing new opportunities for recreation and play within the local area.
- 6.87 The provision of open space aligns with the 'Golden Rules' and **significant positive weight** is given to this matter.

Conclusion on Very Special Circumstances

- 6.88 Notwithstanding that the Site is considered to be on 'Grey Belt' land and therefore not inappropriate development in the Green Belt, the Very Special Circumstances listed above when taken together, significantly and demonstrably outweigh the potential harm to the Green Belt (concluded to be low) in accordance with Paragraph 153 of the NPPF (2024).

d) Suitability and Accessibility of the Site

- 6.89 The Site is considered to be a suitable site for development and located in an accessible location. Technical assessments have been undertaken to support the Site's suitability as evidenced within this planning application.
- 6.90 Given the location of the Site on the edge of Istead Rise village centre, it is afforded a good level of pedestrian accessibility, with direct access into the village centre and shopping parade. There are also a number PRowS located in close proximity to the site. Using the WRAT criteria, all routes achieved in excess of 70%, highlighting the suitability of these routes.
- 6.91 Due to the nature of Istead Rise, on-carriageway cycling is considered appropriate with formal infrastructure located on the A227 Wrotham Road providing direct continuous connection into Gravesend.

- 6.92 Meopham Railway Station is located approximately 2.4km south of the site, accessible in a 4-minute drive or 13-minute bus journey. The station is operated by Southeastern and provides services to destinations including London Victoria, Ramsgate and Dover Priory at a frequency of six trains per hour in all directions. Ebbsfleet Rail Station is located 7.2km from the site, accessible via existing cycle infrastructure in 24 minutes. High-speed services are available every 15 minutes to London St Pancras International via Stratford International. The station is operated by Southeastern and has approximately 5000 parking spaces, and 44 secured cycle parking spaces.
- 6.93 A wider range of services and facilities are available in Gravesend, approximately 6km north of the Site and accessible within a 15-minute bus journey via the 308 service. Services and facilities include but are not limited to: shops, supermarkets, doctors surgeries, schools, employment opportunities and leisure centres.
- 6.94 An accessibility audit has been undertaken by DHA Transport to describe the routes to/from the Site to key destinations such as bus stops, train stations, shops, schools and includes a review of the PRoW in the local area. The audit concludes that there is a direct and easy to navigate route to the existing bus stops with appropriate crossing locations.
- 6.95 The Site enjoys good access to the local highway network and is sustainably located for a rural location, with good connections to existing pedestrian infrastructure and public transport, as well as to everyday facilities and services. A Travel Plan has been submitted as part of the application which promotes sustainable travel behaviours amongst future residents.

e) Definition of Sustainable Development

- 6.96 Para 8 of the NPPF identifies that there are three dimensions to sustainable development, being economic, social and environmental. It is recognised that these roles should not be undertaken in isolation, because they are mutually supportive.
- 6.97 The NPPF and the Council both stress the importance of supporting growth and creating sustainable communities. The proposal will have long lasting economic benefits by providing much needed housing in a sustainable location.
- 6.98 When considering the immediate economic benefits, along with the broader social and environmental benefits resulting from the proposed scheme, it is considered that the development accords fully with the policy objectives of the NPPF:
- 6.99 The main economic benefits of the scheme will generate construction jobs as well as indirect jobs associated with the construction industry. Furthermore, there will be Gross Value Added through the construction phases.

- 6.100 Crucially, as an SME, our supply chain is local, meaning not only do we ourselves employ local people, but our supply chain utilises local companies who in turn, employ local workers.
- 6.101 In respect of new population, the development of 154 dwellings could generate a new population of circa 370 people (assuming 2.4 people per household). This will generate economically active people that will input into the local labour pool as well as additional local expenditure on convenience related goods.
- 6.102 During the construction phase 62 full time local jobs will be created with a further 111 full time regional/UK wide jobs. Local economic output over the construction phase (48 months) will equal £16m, with a total economic output of £28m.
- 6.103 During the operational phase, of the 393 new residents, 19 will be in employment. The local economic output of new residents will generate £4.3m per annum with expenditure on local retail and services equalling £2.5m. Total economic output will total £13m per annum.
- 6.104 In addition, there will be a new homes bonus receipt of £330,000 and Council tax receipts of £353,000 per annum arising from the development.
- 6.105 In respect of a social role, the creation of 154 dwellings including affordable dwellings, will support the creation of strong, vibrant and a healthy community.
- 6.106 In respect of an environmental role the proposed development seeks to deliver areas of open space, landscaping and ecological areas. New tree and shrub planting that is managed will enhance the green infrastructure network and improve biodiversity.
- 6.107 The development will be designed to be resilient to the impact of climate change. Importantly, this includes an 'all electric' development which will help achieve a carbon reduction of approximately 50% over and above current building regulations. This is achieved by a fabric first approach (i.e. greater wall cavity/insulation/specification of windows), combined with the use of Air Source Heat Pumps. In addition, all vehicles will be fitted with rapid electric vehicle charging points creating a development that seeks to accelerate change in behaviour of how energy is consumed.

ii) Residential Development

- 6.108 The proposed development provides for a development of up to 154 new dwellings including 77 affordable units representing 50% provision, in accordance with the 'Golden Rules' set out in Paragraphs 156 and 157 of the NPPF (2024). Paragraph 157 confirms that in cases where the development plan policies for affordable housing haven't been updated in line with paragraph 67-68 of the NPPF, the affordable housing contribution required to satisfy the 'Golden Rules' is 15% above

the highest existing affordable housing requirement which would otherwise apply (subject to a cap of 50%).

- 6.109 The indicative housing mix includes a range of 1-5 bed dwellings. The private/affordable housing mix is to be determined. The Illustrative Site Layout represents a gross density of 16 dwellings per hectare reflecting the Site's characteristics and surrounding uses as well as taking into consideration open spaces and biodiversity net gain, including good design.

iii) Landscape Impact and Open Space

- 6.110 An Illustrative Landscape Masterplan has been prepared by Stantec to demonstrate the landscaping proposals, alongside the scale, massing and articulation of built form that could come forward as part of the detailed Reserved Matters stage.
- 6.111 The aim of the landscape proposals is to create an attractive setting for the new residential development, assimilating the built elements into the surrounding landscape to minimise the impact of the proposed development on the landscape character and visual amenity. It is proposed to enhance and extend the existing landscape framework of the Site, which already provides an extensive and established landscape buffer with the countryside beyond.
- 6.112 The landscape proposals will improve biodiversity across the Site by introducing a variety of ecological habitats to include species-rich hedgerows; native tree planting; grassland; ponds and wetland habitats; street trees; native garden planting; and garden trees.
- 6.113 The landscape strategy for the Site has considered the existing constraints and opportunities, with the focus being on the retention and enhancement of the existing mature vegetation network, within which development would be located. In line with the local landscape character, orchards have been proposed across the Site to reinforce the landscape character within the Site and on a local scale as well as wildflower meadows, shrub planting, trees, hedgerows and wetland areas. This approach will establish more diverse habitats that would enhance the ecological and biodiversity value of the Site.
- 6.114 The delivery of areas of amenity grassland and wildflower grass will provide amenity space and visual interest within the Site, including an area of play for new and existing residents.
- 6.115 The LVIA prepared by Stantec provides an assessment of the landscape and visual effect of the proposed development. From a character perspective at Year 1, the most sensitive receptors are the effects on landscape features such as fields, and orchards. The majority of the site are fields and will be lost as a result of the proposed development. However as part of the landscape strategy and proposed built form, will be set on lower landform and within a high quality residential estate that is situated within areas of existing and proposed planting, leading to a Major Adverse significance of effect. At year 15, given the magnitude of the change, this will remain a Major Adverse effect.

- 6.116 The assessment also considers the effect on the Site and its immediate context. At year 1, the nature of the change would result in a Medium magnitude of effect with a significance of Moderate Adverse. By year 15, the landscape scheme for the proposed development will have matured and provide an enhanced landscape setting that compliments the local landscape and settlement edge. The location of the Site being situated along the edge of Istead Rise has some capacity to accommodate the proposed development with a limited deterioration to the existing landscape. Although agricultural fields will be lost, a significant provision of open space is to be provided on the southern edge. On this basis, the nature of change would result in a Medium magnitude of effect, with the significance reducing to Moderate/Minor Adverse.
- 6.117 Visually, the assessment has considered a number of receptors with all receptors resulting in Very Small to None with Negligible Adverse or Neutral impacts.
- 6.118 Whilst the proposed development will result in adverse effects on a limited number of landscape and visual receptors, these effects are restricted by the combination of the existing landform alongside the existing and proposed vegetation framework and inherent characteristics of the type of development in general. Furthermore, through the iterative LVIA process, the layout of the built form, height and density of built form in combination with a comprehensive landscape mitigation strategy have been guided by a robust understanding and analysis of the Site and its landscape and visual context, with the aim of reducing or where possible avoiding significant or unacceptable adverse landscape and visual effects.
- 6.119 Overall, the Proposed Development results in some adverse landscape and visual effects in the short term, particularly where it replaces open or semi-rural land. However, the long-term design, layout and green infrastructure strategy successfully reduce the scale and prominence of change, supporting a transition to a well-integrated and visually appropriate extension to Istead Rise.
- 6.120 As such, the proposed development accords with the relevant national and local planning policies.

iv) Transport and Traffic

- 6.121 The application is accompanied by a Transport Assessment prepared by DHA Transport, which confirms that a safe and suitable access to the Site can be achieved. Primary vehicular access will be achieved via a new priority junction off Downs Road, which will also provide pedestrian access. An emergency access will also be provided off Longwalk which will be installed with a collapsible bollard and be accessible for pedestrians and cyclists.
- 6.122 To inform the access design, an Automatic Traffic Count (ATC) survey was undertaken on Downs Road in proximity to the proposed Site access for the seven-day period commencing on Saturday 8th March 2025. The recorded 85th percentile vehicle speeds equate to visibility splay requirements of

2.4 x 52.7m northbound and 2.4 x 46.8m southbound of the access, using the Manual for Streets (MfS) calculator. These splays have been demonstrated within the Stage I Site access design.

- 6.123 The Stage I Road Safety Audit recommended five measures are instructed to ensure the access is considered safe. These include: recommendations for double yellow lines to be extended in certain locations, vegetation to be removed within the visibility splays, and staggered barriers to slow cyclists. This will be discussed and agreed with KCC Highways as part of the detailed design phase.
- 6.124 The TA confirms that the vehicular and pedestrian access design has been prepared with reference to the applicable highway standards and has been subject to an independent Stage I Road Safety Audit, all matters raised have been addressed and therefore the proposed vehicular and pedestrian access design and off-site works are considered to be safe and suitable.
- 6.125 The detail of on-site parking provision will be provided within a future Reserved Matters application; and will comply with the adopted parking standards.
- 6.126 Each dwelling will be provided with an 'active' Electric Vehicle (EV) charging point in line with Part S of the building Regulations.
- 6.127 The proposed development has the potential to generate up to 84 vehicle movements in the weekday AM peak hour, 82 vehicle movements in the PM peak hour and a total of 730 two-way vehicle trips across the 12-hour day. This equates to an average one additional vehicle movement every minute on average.
- 6.128 Junction capacity modelling has been undertaken on the Site access junction confirming that the junction will operate well within capacity in all assessed scenarios and the impact of the proposed development is shown to be negligible.
- 3.29 Furthermore, following the results of the accessibility audit and pre-application discussions with KCC Highways and Transport team, a number of enhancements are proposed and are set out within the Transport Assessment. In summary, these enhancements include:
- Raised kerbs to be provided at identified bus stops;
 - Bus shelter to be provided at Downs Road southbound stop with seating;
 - Resurfacing of the existing red surfacing located within the vicinity of the school;
 - Installation of uncontrolled pedestrian crossing point on Downs Road in proximity to Site access; and
 - Contribution towards the 308 Bus Service.
- 6.129 On the basis of the above it is concluded that the proposed development would not have a 'severe' residual impact on the operation of the local highway network with reference to Paragraph 116 of the National Planning Policy Framework.

v) Flooding and Drainage

- 6.130 A Drainage Strategy and Statement has been prepared by Ardent which outlines the surface water and foul drainage for the Site. The report concludes that the Site is located entirely within Flood Zone 1 and is at low risk of flooding from all sources.
- 6.131 The proposed surface water drainage strategy for the Site demonstrates a system of sustainable drainage and attenuation features to provide sufficient attenuation storage within the Site during the 1 in 100-year storm event +45% allowance for climate change.
- 6.132 Foul drainage is achieved via 2 No. connections to the foul network via an on-site diversion in the western half of the site, and via connection on Downs Road for the northern portion of the Site.
- 6.133 In conclusion, this document demonstrates that the proposals are consistent with the aims of the NPPF, the Planning Practice Guidance to the NPPF and local planning guidance. The Site will not be at significant risk of flooding or increase the flood risk potential to others.

vi) Ecology

- 6.134 An Outline Ecological Impact Assessment (OEIA) has been prepared by EPR to identify the potential for protected habitats and species present in relation to the proposed development and to provide a baseline assessment of current site conditions and provide recommendations. The Site was surveyed in March 2025 based on the standard extended Phase 1 methodology. An ecological Constraints and Opportunities Plan was used to inform the emerging designs.
- 6.135 As a result of the findings of the OEIA, further surveys are currently being undertaken for bats, birds, reptiles, and a botanical survey. Full survey results are available within the accompanying reports.
- 6.136 The illustrative design and landscaping proposals for the Site incorporate ecological mitigation and habitat enhancement measures that minimise any significant adverse effect on these features during the construction phase and provide biodiversity net gain.
- 6.137 A Biodiversity Net Gain Assessment has been undertaken and a BNG Design State Report is submitted alongside this application. The requirement to provide a 10% net gain will be achieved through on-site enhancement measures combined with the purchase of off-site credits.
- 6.138 The proposals have sought to minimise impacts on biodiversity and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the

proposals will result in significant harm. Ecological enhancements are proposed to achieve a biodiversity new gain.

vii) Arboriculture

- 6.139 An Arboricultural Impact Assessment has been prepared by Down to Earth and includes a Tree Protection Plan and Arboricultural Method Statement. The report concludes that to facilitate the development it will be necessary to remove 13 individual trees, all of which 4 are Category B and 9 are Category C, and 6 tree groups comprising 150 stems all graded Category C and therefore low-quality specimens and have limited landscape and arboricultural value with a life expectancy of less than 10 years. As such, the removal of the trees will not have a significant impact on the appearance of the local landscape.
- 6.140 Furthermore, a Tree Root Protection Plan will be implemented and maintained during the course of development to ensure the retained trees are incorporated into the final layout.
- 6.141 The Illustrative Layout has sought to retain higher value trees, and incursions into retained RPAs are limited and manageable with standard mitigation measures. The development is therefore considered acceptable from an arboricultural standpoint.

viii) Archaeology

- 6.142 An Archaeological Desk-Based Assessment has been prepared by HCUK and submitted as part of this application.
- 6.143 There are no designated archaeological assets within the Site. Therefore, the proposals will not impact on any designated archaeological assets. Based on the information within the KHER, supplemented by historic mapping, LiDAR and Satellite Imagery and documentary research, the Site is considered to have low to high potential for archaeological remains to be identified within the Site, and varies by period. There is medium-high potential for the Prehistoric period, medium potential for the Roman period, low-medium potential for the Early Medieval and Medieval periods, and high potential for the Post Medieval and Modern periods.
- 6.144 The KHER records show evidence for Prehistoric activity within close proximity to the Site, primarily relating to cropmarks and findspots of Bronze Age and Iron Age date. The Archaeological Notifications Area (ANAs) which cover the Site also highlight potential for Palaeolithic remains within the Site. The Site also lies at the north-eastern end of a paleochannel of probable Prehistoric date, the route of which likely runs through the centre of the Site.

- 6.145 Historic map regression shows the presence of former field boundaries within the Site and various buildings within the Site during the Post Medieval and Modern periods.
- 6.146 On the basis of available evidence, it is considered that the proposed development accords with current legislation and the planning policies contained within the NPPF. Any surviving remains it is considered that the archaeological interest of the Site could be suitably mitigated by undertaking archaeological investigations secured via condition following development consent.

ix) Heritage

- 6.147 A heritage assessment has been prepared by HCUK (November 2025), in accordance with Para 207 on the NPPF to support the proposed development. There are no designated or non-designated heritage assets within the application site. There is one nearby listed building, Downs Hall (Grade II), located c.60m north of the site boundary. This is the only heritage asset considered potentially to be susceptible to effects of the proposals.
- 6.148 The report provides an assessment of the impact of the proposed development on the significance of the heritage asset identified, including the effects on the setting of those assets. The application Site was found to form an important part of the setting of the Grade II listed Downs Hall, and remains a positive aspect of the assets setting which contributed to its understanding as a former farmstead, and as such its significance.
- 6.149 Full considerations has been given to the level of change posed by the proposed development, it is clear that the level of change is sufficient to alter the way in which it is experienced and understood. It should be noted that the proposed housing would only be noticeable in some incidental views, rather than in those key views at close range on Downs Road, from where the architectural and historic interest of the building can be best appreciated.
- 6.150 Therefore, it is concluded that the outline proposals pose a low-medium level of less than substantial harm to the listed building and paragraph 215 of the NPPF is engaged. This is because while the development will affect the views and setting of the building in the wider context, the topography and existing surroundings of the building mean that close range views of it and its immediate grounds would not be affected and the ability to appreciate the building as a former farmhouse would still very much persist.
- 6.151 On this basis, the NPPF requires the decision maker to assess whether the public benefits of the proposal outweigh the low-medium level of less than substantial harm. As set out above within the principle of development section, the benefits of the scheme are significant and as such it is considered that the proposed development is acceptable in heritage terms and as such there are no sound reasons for an objection relating to heritage.

x) Air Quality

- 6.152 An Air Quality Assessment (prepared by Ardent, November 2025) has been submitted in support of this application. The assessment sets out the scope of the assessment, the baseline conditions, predicted impacts, and mitigation measures.
- 6.153 It is anticipated that subject to the implementation of all relevant mitigation measures outlined within the assessment, the residual impacts from dust generating activities are predicted to be not significant, in accordance with the IAQM guidance. Impacts from operation phase road traffic emissions are considered not significant, and future residents at the development site are considered unlikely to be exposed to pollution concentrations above AQALs.
- 6.154 On this basis, the proposed development is fully compliant with national and local planning policy.

xi) Contamination

- 6.155 A Phase I Preliminary Risk Assessment has been prepared by Idom and submitted in support of this application. The purpose of the assessment was to identify any contaminative or geotechnical issues associated with former land use which might impact on the redevelopment of the Site.
- 6.156 The Phase I assessment identified several potential contamination sources on site and as such further investigations are required in the form of drilling boreholes and machine dug trial pits to investigate the presence or absence of potentially contaminated soils and groundwater at the Site. It is also recommended that further intrusive investigations are undertaken to monitor hazardous gas / vapour and groundwater to determine any additional requirements.

xii) Section 106 Heads of Terms

- 6.157 The Council has not adopted a CIL levy and accordingly S106 Contributions will be sought. It is anticipated that Section 106 contributions may include contributions or agreements towards highways improvements, education, healthcare and other community uses.

7.0

PLANNING BALANCE AND CONCLUSION

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of planning applications must be made in accordance with the Development Plan unless material consideration indicates otherwise.
- 7.2 Whilst this application seeks a departure from the Development Plan, it does so on the basis that the corresponding housing policies are ‘out of date’ and preventing the Local Planning Authority to meet its housing need.
- 7.3 The Site is located wholly within the Green Belt, however as demonstrated in Section 6 of this Planning Statement the Site constitutes ‘Grey Belt’ land, as defined in Annex 2 of the NPPF (2024). Development of homes in the Green Belt should not be regarded as inappropriate where it utilises Grey Belt land and meets all the tests set out within Paragraph 155 of the NPPF. This Statement determines that the proposed development meets **all** these tests and is therefore **not inappropriate** development in the Green Belt.
- 7.4 As such relevant test for granting planning permission is no longer Paragraph 153. Footnote 55 confirms that the requirement as set out in Paragraph 153 to “*ensure that substantial weight is given to any harm to Green Belt, including harm to its openness*” **does not apply**.
- 7.5 Therefore, the relevant test for granting planning permission is Paragraph 11(d)(ii), which sets out a presumption in favour of granting planning permission.
- 7.6 This Planning Statement has demonstrated that the housing shortfall across Gravesham Borough is significant and persistent. In such situations, Paragraph 11(d) of the NPPF should be engaged and the application approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 7.7 This Planning Statement has also demonstrated that proposed development is in keeping with the principles of sustainable development and will deliver a wide range of economic, social and environmental benefits.
- 7.8 The sensitive, and thoughtful landscape led design will ensure that the proposed development integrates well into its surroundings. The generous open space provision forms an important part of the masterplan, providing critical green infrastructure in the form of amenity and play provision, landscape buffers and the enhancement of biodiversity.
- 7.9 The proposed development will make a significant and effective contribution towards meeting housing needs, in a Borough that is currently unable to meet its housing requirements. It will also provide much needed affordable homes. The development will create a balanced and vibrant community whereby residents are not solely restricted to using the car.

7.10 The development proposals provide a significant number of benefits which should be weighed in favour of granting permission. These include the following:

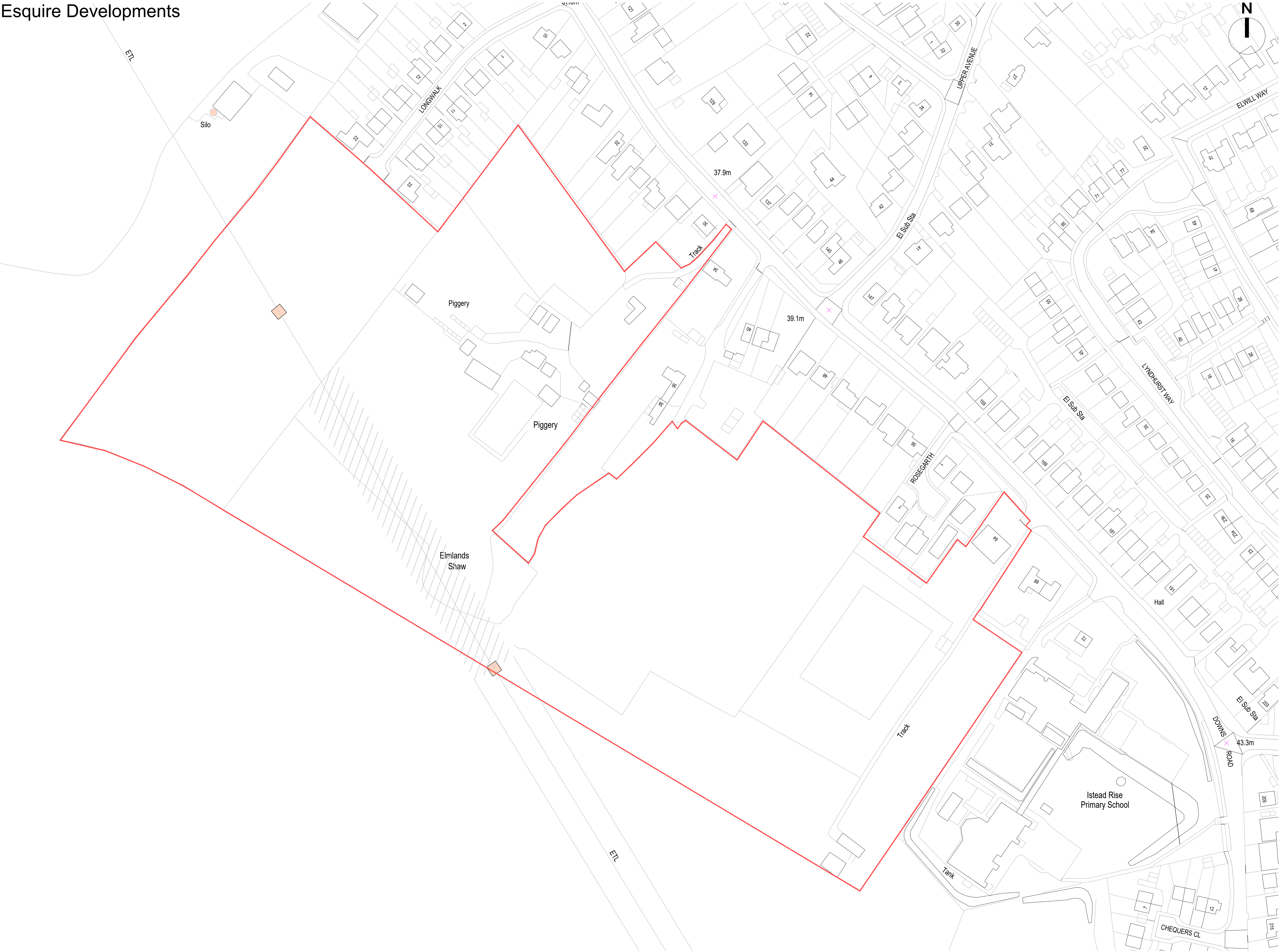
- Provides much needed market and affordable homes for local people in a sustainable location;
- Provides a high-quality scheme of an appropriate scale and nature to the existing environment;
- Will make efficient and effective use of a site;
- Will positively address Climate Change by bringing forward an all-electric development by way of a fabric first approach and Air Source HEAT Pumps (i.e. no gas Boilers). The overall effect will be approximately 50% in carbon reduction over and above current Building Regulations;
- Is being brought forward by a SME;
- Will add choice of housing to the market;
- Will support the growth of the economy;
- Will result in beneficial impact to the landscape features through new and managed planting;
- Will be sensitively designed to respect the local ecology and biodiversity of the Site and protect and enhance the local ecology via enhancements to the natural landscape;
- Would not have a severe impact on existing highways and drainage infrastructure.

7.11 The supporting documents and plans submitted as part of this application have demonstrated that the proposal represents a high-quality sustainable development that accords with the relevant planning policies of the Development Plan and other material considerations including the NPPF and, as such, that the proposal should be supported.

APPENDICES

APPENDIX A

Site Location Plan Drawing



NOTES:

Do Not Scale.

Report all discrepancies, errors and omissions.

Verify all dimensions on site before commencing any work on site or preparing shop drawings.

All materials, components and workmanship are to comply with the relevant British Standards, Codes of Practice, and appropriate manufacturers recommendations that from time to time shall apply.

For all specialist work, see relevant drawings.

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Rev	Date	Description
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Project Title

Proposed Residential Development
Istead Rise

Drawing Description

Site Location Plan

Scale	Drawn by
1:1000@A1	JS
Date	Checked by
August 25	TWM

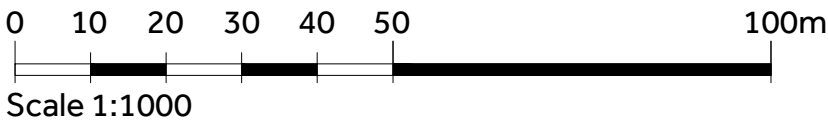
CLAGUE ARCHITECTS

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Drawing Number	Revision
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APPENDIX B

The Role of SMEs



THE ROLE OF SMEs

- 1.1 This statement set out the importance currently being placed by successive Central Governments on the role of Small to Medium Enterprises (SMEs) in the housebuilding Industry and demonstrates the vital role SME Housebuilders, who have been described as being of 'National Importance' and 'the back bone of house building in the UK', will play in complementing volume housebuilders to deliver Local and National housing requirements.

A. The Previous Conservative Government's Position on SME'S

i) Building More Homes – July 2016

- 1.2 The Government has made it clear that it is committed to increase housebuilding to deliver 300,000 homes per year by the mid 2020's. The target figure of 300,000 homes per year comes from a recommendation in the House of Lords Economic Affairs Committee report, 'Building More Homes', published in July 2016¹. The figure takes into account estimated population change but also to address the backlog created by the failure to build enough homes over many years. All the main political parties have accepted the 300,000 dwelling per annum figure.
- 1.3 Statistics monitoring completions across the UK (gov.uk) confirm Housebuilding has not achieved this level of growth since 1977-78 (314,090 dwellings – Live_Table 109) and in 2017-18² only 222,194 dwellings (Live_Table 122) were completed. Whilst this is an increase since 2012-13 (124,722 completed dwellings), this is still well short of the 300,000 dwelling target.

ii) Home Builders Federation – January 2017

- 1.4 In January 2017, the Home Builders Federation prepared a research paper titled 'Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes'³. This document highlighted a number of facts, inter alia:
- In 1988, small builders were responsible for 4 in 10 new build homes (40%). Today it is just 12%.
 - In 1988, 12,000 SMEs were building houses. In 2017, this figure was only 2,500 SMEs.

¹ <https://publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

² 2018-19 data is not yet complete.

³ https://www.hbf.co.uk/documents/6879/HBF_SME_Report_2017_Web.pdf



- The average permissioned housing scheme has increase in size by 17% since 2007, suggesting many allocated sites are out of reach for smaller companies.
- Small sites are consistently efficient in their delivery.
- Delay and risk during the planning stage has influenced lender attitudes to housebuilding meaning terms SMEs borrow on are restricting growth opportunities.
- In 2007-2009, 33% of small companies ceased building homes.
- Returning to 2007 home builder levels could see housing supply boosted by 25,000 dwellings per year.

1.5 The HBF report attributes the reasons for the decline in SMEs has been for two principal reasons:

1. A long-term trend following landmark planning legislation in 1990 which tipped the balance of control significantly further away from entrepreneurial home builders to LPAs; and,
2. The above long-term trend compounded by the Global Financial crisis in the late 2000s when the availability of development finance became a concern.

1.6 The report continues that *'the above effects are further compounded by the availability of suitable housing sites and the constant struggle of securing an implementable planning consent through the planning process beset by delays and bureaucracy. These delays and associated costs have tangible impacts on SMEs and their ability to grow. Whilst larger companies can mitigate risk across a number of sites, small firms encountering delays on one or two sites will be the difference between a year of growth and a year of contraction'*.

iii) White Paper – February 2017

1.7 The release of the Government's White Paper in February 2017 titled 'Fixing our Broken Housing Market'⁴ only reinforced the concerns about the lack of SMEs building Houses. The Report identified 3 main problems and described the housing market as 'broken', blaming the supply shortage, *"for too long, we haven't built enough homes"*. The three problems were identified as:

1. Not enough local authorities planning for the homes they need;
2. House building is simply too slow; and,

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf



3. The construction industry is too reliant on a small number of big players. (our emphasis)

1.8 The white paper outlined the Government's plans to change ('fix') the market. It called for *'a new approach to house building that included: building homes based on need; building homes faster; diversifying the house building market; and by making it more affordable for people to buy homes.'* (our emphasis)

1.9 The White Paper was clear that the Government intends to open the housing market to smaller builders and those who embrace innovative and efficient methods.

iv) House of Lords Debate – January 2018

1.10 On 11 January 2018, the House of Lords debated 'Housebuilding in the UK'⁵ and noted the performance of the UK's major house builders. The debate acknowledged the 2017 HBF report and focussed on the HBF suggestion that part of the practice of local authorities focusing on larger sites with a very high number of units may be counterproductive. The debate acknowledged *'that while it may be efficient in strong market areas, it is inefficient in weaker market areas. While the NPPF has been lauded for increasing the number of planning consents, it is argued that the number of sites permissioned, in areas of need, remains short of where it needs to be.'*

v) Revised NPPF – July 2018

1.11 The manifestation of the above discussions set about the introduction of a new approach within the revised NPPF 2018⁶, which sought to encourage the use of smaller sites and the requirement that 10% of the housing requirement on sites no larger than 1ha should be identified. The 10% target and 1ha was amended from the consultation version suggestion 10% of 'allocations' and only 0.5ha sites. The increase acknowledged the greater variety of sites SMEs are attracted to.

⁵ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/LLN-2018-0001#fullreport>

⁶

<https://webarchive.nationalarchives.gov.uk/20181206183454/https://www.gov.uk/government/publications/national-planning-policy-framework--2>



vi) **Letwin Independent Review of Housing Build Out Rates – October 2018**

- 1.12 In October 2018, Sir Oliver Letwin issued his final ‘Independent Review of Build Out’⁷ report and recommendations on how to close the significant gap between the number of housing completions and the amount of land allocated or permissioned on large sites in areas of high housing demand.
- 1.13 Whilst the main body of the report focussed on the perceived issue of land banking, Sir Oliver Letwin identified that the *‘build out rate’ on small sites is intrinsically likely to be quicker than on large sites; (to take the limiting case, a site with just one house will take only as long as required to build one unit).’*

vii) **Homes England Strategic Plan 2018-2023 – October 2018**

- 1.14 In October 2018, Homes England released its 5-yr ‘Strategic Plan 2018-2023’⁸ plan to detail how it will improve housing affordability, helping more people access better homes in areas where they are needed most. The plan outlines their ambitious new mission and the steps that they will take, in partnership with all parts of the housing industry sector, to respond to the long-term housing challenges facing the country.
- 1.15 The Strategic Plan goes to some lengths identifying the decline in SME housebuilders and the result being the house building market is increasingly made up of a small number of house builders, meaning there is insufficient diversity, competition and capacity. The report continues:

There are a number of barriers preventing smaller builders from delivering a greater number of homes including: a lack of development finance; a land market weighted in favour of larger builders; and a complex planning system.

This is why we’ll create a more resilient and competitive market by supporting smaller builders and new entrants. In addition, Homes England

7

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf

⁸ <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>

will work with house builders to promote better design and higher quality homes.

- 1.16 Driving Market Resilience has therefore been identified as a key priority for homes England. This includes access to finance but crucially where HE own sites which are too large to be developed by smaller builders, they will look for opportunities to create smaller parcels which better suit their capacity. They will achieve this improving opportunities for smaller builders to access land, and introduce simpler tender and legal documents on smaller sites to make the bidding process easier.
- 1.17 Furthermore, the strategic report looks beyond the immediate 5-yr plan and identifies a longer term priority to explore opportunities for, inter alia, removing the planning burdens faced by smaller builders on more complex sites.

viii) House of Commons Briefing Paper – December 2018

- 1.18 On 12 December 2018, a House of Commons Briefing Paper titled *‘Tackling the Under-Supply of Housing in England’*⁹ was released. The report addressed all facets of factors influencing the delivery of new homes and addressed in detail ‘Support for SME Developers’.
- 1.19 The Briefing paper recognised the barriers to delivery and the impact that competition for land has on SMEs. The report states that *‘While there is sufficient land to build on, land is scarce in economic terms as its supply is inherently limited and fixed. This leads, it is argued, to developers having to undergo ‘fierce’ competition for land “while remaining uncertain as to what planning permission they will be able to secure.” The price of land is certainly viewed as a barrier to housebuilding. The gain in value that planning permission offers is said to encourage strategic land trading, rather than development, resulting in the most profitable beneficiaries of residential development being the landowner, not the developer. High land prices can, in turn, force down the quality and size of new homes and present difficulties for small and medium sized enterprises (SMEs) when seeking to compete for sites to develop.’* (our emphasis)
- 1.20 The Briefing Paper further acknowledged the over reliance on a small number of developers and considered that *‘This concentration of market power is felt to inhibit competition and can exacerbate the impact of market shocks when all the large firms simultaneously reduce output’.*

⁹ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7671#fullreport>



- 1.21 The briefing paper recognised that housebuilding requires considerable up-front investment, meaning that *‘in most cases, new housing developers need access to finance. For the housebuilding industry, a particular concern is access to finance for SME developers. The Aldermore Group, a bank specialising in finance to small businesses, have stated: ...smaller developers continue to struggle with access to finance, with a recent industry survey showing that more than 50,000 construction and real estate firms have begun the year in ‘significant’ financial distress...unless more is done by lenders to increase funding to smaller regional developers, the potential for the industry to reach... [the Government’s house building target]...will be less likely.’*
- 1.22 Problems accessing finance can have an impact on house builders’ ability to produce high quality housing, as well as on the overall capacity of the house building industry. As far back as the Budget 2014 a commitment was made to support SME access to finance with the government creating a £500 million Builders Finance Fund to provide loans to developers to unlock 15,000 housing units stalled due to difficulty in accessing finance. In July 2015, the then Housing Minister announced that the Fund would be extended. The Spending Review and Autumn Statement 2015 further extended the £1 billion Fund to 2020/22. In October 2016 the launch of a £3 billion Home Building Fund under which builders, including SME builders, can obtain loan finance to assist with development costs and infrastructure work was established.
- 1.23 The Autumn Budget 2017 announced a further £1.5 billion for this Fund “providing loans specifically targeted at supporting SMEs who cannot access the finance they need to build. The 2017 Budget also said: “The government will explore options with industry to create £8 billion worth of new guarantees to support housebuilding, including SMEs and purpose built rented housing.
- 1.24 The briefing continues that SME developers are less able to withstand market shocks. This is illustrated by the fact that their share of total housing starts declined after each of the last two house price crashes (as quantified in the 2017 HBF report). A factor that would reduce risk and improve confidence in the development process is house price stability.

ix) Revised NPPF - February 2019

- 1.25 In February 2019, the latest version of the NPPF¹⁰ was released. This continues the March 2018 version in respect of the desire to encourage smaller sites to come forward in the planned system. Paragraph 68 of the NPPF 2019 states:

68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
 - b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
 - c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
 - d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

- 1.26 The NPPF makes it clear that that small and medium sized sites can make an important contribution to meeting housing requirements in an area. To this end and to encourage small and medium sites, para 68 (a) seeks that 10% of small sites no larger than 1ha should be identified.
- 1.27 WDC needs to respond to this guidance in a proactive way. As detailed above, due to the competition for SMEs to enter the market it is likely that sites being promoted by SMEs will fall into Rural Service Centres or smaller villages away from the main urban areas or areas perceived as having the greatest accessibility. In this respect, paragraphs 77 and 78 (Rural Housing) of the NPPF complement paragraph 68 insofar that they recognise that planning policies need to be responsive to local circumstances and support housing development that reflects local needs. Para 77 continues that to support opportunities for affordable housing,

¹⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf



some market housing should be considered to facilitate this. Para 78 further supports that housing should be located where it will enhance or maintain the vitality of rural communities. Policies should identify opportunities for villages to grow and thrive.

- 1.28 Small and Medium sized sites can make a valuable contribution to these locations principally because the approach of SMEs is more flexible than a volume housebuilder and therefore can at a scale and quality that reflect the characteristics of village locations.

x) Speech by Minister of State for Housing, Esther McVey – September 2019

- 1.29 Most recently, in September 2019, the Minister of State for Housing, Esther McVey gave a speech¹¹ at the convention for the residential property sector. Alongside reaffirming the commitment to 300,000 homes per annum, reference was made to improving the quality of housing and posed the following point *‘and what about the jobs and the careers to build all these homes, we need to think about that. We need to be opening up this house building to SME’s, bringing them onboard, bringing it to communities, bringing it to the self-build and bringing in modern methods of construction.’*

xi) Statement of Minister of State for Levelling Up, Housing and Communities – July 2023

- 1.30 In July 2024, the SoS spoke to the long-term plan for housing. Within this statement, the SoS committed to a new era of regeneration, inner-city densification and housing delivery across England, with transformational plans to supply beautiful, safe decent homes in places with high-growth potential in partnership with local authorities.
- 1.31 In addition to targeted action in a few high-potential areas, the government’s plan delivers a package of reforms to unleash building on underused sites in high-demand regions. As part of the package of reforms, the SoS states that development should proceed on sites that are adopted in a Local Plan with full input from the local community, unless there are strong reasons why it cannot. Local Councils should be pragmatic in agreeing changed to developments where conditions mean that the original plan may no longer be viable, rather than losing the development wholesale or seeing development mothballed.

¹¹ <https://www.gov.uk/government/speeches/resi-convention-2019>



- 1.32 Furthermore, the SoS encouraged the better use of small pockets of brownfield land by being more permission, so more homes can be built more quickly, where and how it makes sense, giving more confidence and certainty to SME builders.

xii) Revised NPPF – December 2023

- 1.33 In December 2023, the NPPF was further revised¹². This continued the previous iterations of the NPPF in respect of the vision to encourage smaller sites to come forward through the plan-making system. The updated para 70 continues to make clear that small and medium sized sites can make an important contribution to meeting housing needs in an area. Para 70 goes on to seek that 10% of small sites are no larger than 1ha should be identified. The revised NPPF adds another requirement for:

“e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”

- 1.34 It is recognised that the delivery of smaller sites can address the immediate housing crisis in the short term. It is understood that smaller sites can come forward quickly, developed by local SMEs with a vested interest in delivering the site within a short timeframe. The larger strategic sites take significant time to be promoted through the Plan-making stage, as well as through the application stage, ensuring the infrastructure requirements to support large scale developments are fully considered before development can commence.

vi) Revised NPPF – December 2024

- 1.35 In December 2024, the NPPF was revised by the recently elected Labour Government¹³. The revised NPPF was introduced following the wide range of changes proposed by the Labour Party throughout their election campaign. This includes but is not limited to, a requirement for all Council's to meet their housing requirement, as calculated via the amended Standard Method unless 'hard constraints' such as flood risk demonstrate that it is not possible. As a result of the amended methodology for calculating housing need, the yearly housing target across the Country has increased to 370,000 homes per annum.

¹² https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

¹³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



- 1.36 A significant change as part of the 2024 revised NPPF is the removal of the amendments published within the 2023 revised NPPF. This includes the removal of 4-year housing land supply.
- 1.37 Furthermore, in an attempt to meet their housing need, the Government have introduced the concept of Grey Belt, whereby poorly performing Green Belt is deemed appropriate for development, where it meets the identified 'golden rules' of the NPPF, i.e. 50% affordable housing.
- 1.38 There is a clear drive from Government to increase house building across the country, improve affordability through the building of 370,000 homes per annum, with a particular focus on delivering affordable homes.

B. Pace of Delivery of an SME

- 1.39 SME's help diversify the market and deliver choice and quality, but they can also deliver at a quicker pace than larger sites. This means that by supporting SME's into the housing market, LPAs can strengthen its Housing Delivery and ensure a steady supply of deliverable sites.
- 1.40 Typically, Esquire Developments aim to take no more than 6 months from receipt of detailed consent to start on site.
- 1.41 The SME business model is usually set up differently to volume housebuilders. SME's are more flexible in matters such as design and landowner negotiations. In addition, SME's also try to limit their financial risk/exposure. As a result, there are a number of factors that affect an SME's approach to delivering a site. This includes:

1. Cash Flow

- SMEs tend not to land bank as a return on their financial exposure/risk is critical to maintaining a profitable business. In this respect Cash Flow is critical and due to the time lag involved in the return of funds from a development (i.e. once homes begin to be sold), it is essential SMEs seek to reduce the time taken from the point of receiving a planning permission to the point of the sale of a house. This means once an implementable planning consent is secured, SMEs commence as quickly as possible to start on site. Larger PLCs can better carry this risk through multiple sites



and numerous pipeline of completions - whereas SME's will have fewer outlets and therefore less regular returns in this respect.

2. Infrastructure Requirements

- Infrastructure requirements on small to medium sized sites are less onerous. This means discussions/contracts with utility providers are less complicated and time taken to implement the required infrastructure is less allowing this element of the build to be quicker.

3. Land Negotiations

- Often small and medium sized sites have fewer legal complications. This includes fewer land registry titles and fewer landowners and as a result fewer negotiations/legal complications that larger sites or larger PLC companies require. This often makes the 'land deal' more straightforward and thus quicker.

4. Flexibility in Product and Process

- Due to an SME's flexible approach to design quality and that standard house types tend not to be adopted, SME's have the ability to be more flexible when it comes to product choices. This not only allows the SME to offer a variety of product or specifically address local characteristics/design requirements, but it also means the SME can respond quickly to any delays or changes to the supply. This is mainly due to the decision makers being involved in the process and being 'hands-on'. As a result, there is a less hierarchal structure and decisions can be made quickly and efficiently – again reducing time.

5. Working relationships

- SMEs tend to work with a close number of trusted consultants and suppliers who also tend to be SMEs. This not only ensures quality of service and product but allows for open communication when it comes to availability of supplies and delivery of products. This means any potential delays are anticipated and the ability to successfully work through solutions. In addition, the sale of the dwellings tends to be on a more bespoke basis meaning the dialogue and communication between SME and Buyer is also on an open and communicative basis.

6. Sales Rates

- Once construction has commenced, completion rates, which follows sales rates matches the market demand and therefore an SME can build out at the same pace as larger volume housebuilders who adopt the same approach.

1.42 Whilst there is little literature addressing the delivery of small sites, there is a significant amount relating to the delivery of large-scale sites. Nathaniel Litchfield & Partners (NLP) produced a research paper titled ‘Start to Finish – How quickly do large-scale housing sites deliver? (November 2016)’¹⁴. The report recognised that *‘Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period..... But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes’*.

1.43 The report continues that *‘past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result’*. NLP suggest that if authorities’ Local Plans and five-year land assessments are placing reliance on large-scale developments, including Garden Towns and Villages, to meet housing need, then *“the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.”*

vii) Revised NPPF – July 2021

1.44 The NPPF was revised in July 2021¹⁵ to accommodate a number of changes. This included a change in emphasis to good design and how good design was fundamental to what the planning and development process should achieve. Furthermore more, it confirmed development that is not well designed, should be refused and conversely, significant weight should be given to developments which reflect local design policies and/or promote high levels of sustainability or help raise the standard of design more generally in an area. SME’s as well placed in this regard to meet these challenges successfully.

1.45 The updated NPPF also amended the numbering of paragraph 68 to paragraph 69, but made no text changes to the 2019 version.

¹⁴ <https://lichfields.uk/media/1728/start-to-finish.pdf>

¹⁵ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

viii) The Bacon Review (August 2021)

- 1.46 In August 2021, the Prime Ministers Independent Review into scaling up self build and custom housebuilding was published¹⁶. Led by Richard Bacon MP. Whilst primarily dealing with recommendations to government on how to support growth in all parts of the custom and self build market, helping to boost capacity and overall housing supply in our housing market, the review touched on the plight of smaller building firms.
- 1.47 The report outlined how smaller firms now account for only 12% of new housing stock and *'have been largely squeezed out by very big companies who can afford the time and cost involved in negotiating a path through the complex thickets of the planning system'*.
- 1.48 The review continues that *the SME sector has nearly been destroyed as a direct consequence of a regulatory environment which is both exceptionally complex and fraught with risk, so that the gaining of planning consents requires both very deep pockets and the ability to bear significant risks over very long periods of time.*

ix) Meeting Housing Demand, House of Lords Select Committee (January 2022)

- 1.49 In January 2022, the House of Lords Select Committee released its report 'Meeting Housing Demand'¹⁷. A series of recommendations to Government about addressing housing demand. This included recommendations on the planning system as well as the role of SMEs (Chapter 4). The report confirmed:

'In this report, we call on the Government to take action and remove the administrative and other blockers which, at present, make increasing the number of homes built much more difficult. We recognise that these challenges play out differently across the country as a whole. London and the South East face different challenges to other regions, as do those at different ends of the affordability scale.'

Small and Medium-sized Enterprises (SMEs)

The role of SMEs in the housebuilding industry has collapsed: in 1988, SME housebuilders built 39% of new homes; now they build just 10%. If housing

¹⁶ <https://www.gov.uk/government/publications/independent-review-into-scaling-up-self-build-and-custom-housebuilding-report>

¹⁷ <https://committees.parliament.uk/work/1328/meeting-the-uks-housing-demand/publications/reports-responses/>

demand is to be met, SMEs should be supported through reduced planning risk, making more small sites available, and increased access to finance. We also provide options for a fast-track planning process for SMEs to reduce delays and planning risk.

1.50 In terms of summary of conditions, in respect of SME's the report made the following:

SMEs

12. The role of SMEs in the housebuilding industry has seen a sharp decline: in 1988, SME housebuilders built 39% of new homes, by 2020 this had dropped to 10%. The Government should encourage SME housebuilders in order to diversify the market and maintain competition. (Paragraph 103)

13. Local authorities should support SME housebuilders to navigate the planning process. One focus of the Government's planning reforms should be to reduce planning risk by making decisions more predictable and reducing delays, which will benefit SMEs. The Government should work with local planning authorities to create a fast-track planning process for SMEs. (Paragraph 104)

14. Wider adoption of the 'master developer' model, where larger sites are built out by a number of different housebuilders, would help SME housebuilders bid for more secure developments. The Government should require local planning authorities and Homes England to increase the percentage of homes on larger sites each year which are built by SME housebuilders. (Paragraph 108)

15. Access to finance is one of the key barriers for SME housebuilders. The Government should work with lenders to encourage them to provide more support to SME housebuilders on commercial terms. (Paragraph 112)

1.51 In March 2022, the Government published its response to the report¹⁸. In response to matters relating to SME's, the Government responded in the following ways:

'We agree with the Committee that there remain some specific barriers to increasing housing supply. To alleviate these, we are continuing to drive up the supply of good quality new homes that people need and want, including by diversifying the market and supporting SMEs through the Government's Levelling Up Home Building Fund'

¹⁸ <https://committees.parliament.uk/publications/9234/documents/159940/default/>



The Government wants to increase competition in the housebuilding market, supporting SME housebuilders to deliver the choice of housing consumers need and want in this country. We agree with the Committee's report that SMEs have a vital role in making the housing market more diverse, competitive and resilient, and we are committed to ensuring the right support is in place. SMEs have a vital role in training and retaining their workforce, including delivering apprenticeships.

As stated in the Committee's report (p. 43), Government is aware that historically the three main barriers SMEs identify as facing are planning, land and finance. We have put in place a package of measures, including financial initiatives to help SMEs grow and develop, such as the Home Building Fund and the ENABLE Build Guarantee scheme. The Home Building Fund will see up to £3 billion of funding or short-term development loans provided to SMEs, custom builders and developers using modern methods of construction. It has supported many new sector entrants, with two thirds of the SMEs who have utilised funding existing for less than three years. We have committed 91% of the initial £2.5 billion development finance allocated to the Home Building Fund, and 94% of contracted transactions are with SMEs, two-thirds of which had existed for less than three years when accessing the fund. Home Building Fund development finance is now expected to support close to 70,000 homes once fully committed.

Funding has contributed to interventions like the Housing Accelerator Fund, a lending alliance between Homes England and United Trust Bank which provides SMEs with development finance at up to 70% Loan to Gross Development Value, and the Housing Delivery Fund, set up with Barclays, which provides £1 billion of loan finance to help support small and medium sized developers, speeding up the delivery of thousands of new homes across England.

To build on the success of the Home Building Fund, we have now launched a £1.5 billion Levelling Up Home Building Fund. This will provide loans to small and medium sized builders and developers to deliver 42,000 homes, with the vast majority going outside London and the South East.



We welcome the Committee's suggestions on planning and land. The Government is considering how to best take forward proposals around changes to the planning system, including how they align with and support our wider mission to level-up the country and regenerate left-behind places. Within this, we are exploring further options to support prompt and faster build-out of sites as part of our proposed changes. These changes will support diversification by providing small builders with more speed and certainty in the planning process.

x) Levelling Up and Regeneration Bill: Reforms to National Planning Policy (Dec 2022) Consultation

1.52 In December 2022, the Government consulted on the 'Levelling-up and Regeneration Bill: reforms to national planning policy'¹⁹. This proposed a suite of amendments to the NPPF. Specifically, in relation to SME'S, the consultation made the following statement:

More small sites for small builders

10. Small sites play an important role in delivering gentle density in urban areas, creating much needed affordable housing, and supporting small and medium size (SME) builders. Paragraph 69 of the existing National Planning Policy Framework sets out that local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. The Framework also asks local planning authorities to use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; and to support the development of windfall sites through their policies and decisions. Local planning authorities are asked to work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

11. We have heard views that these existing policies are not effective enough in supporting the government's housing objectives, and that they should be strengthened to support development on small sites, especially those that will

¹⁹ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy#chapter-4--planning-for-housing>



deliver high levels of affordable housing. The government is therefore inviting comments on whether paragraph 69 of the existing Framework could be strengthened to encourage greater use of small sites, particularly in urban areas, to speed up the delivery of housing (including affordable housing), give greater confidence and certainty to SME builders and diversify the house building market. We are seeking initial views, ahead of consultation as part of a fuller review of national planning policy next year. Alongside this, the government has developed a package of existing support available for SME builders, including the Levelling Up Home Building Fund which provides development finance and Homes England's Dynamic Purchasing System which disposes of parcels of land.

- 1.53 Two important questions were asked as part of the consultation:

Q.24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Q.25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

- 1.54 Notwithstanding the above, in December 2023 a revised NPPF was released that made no change to the position of SME Housebuilders. Shortly thereafter, a General Election was called and in July 2024, Labour won the majority of Parliament.

The New Labour Governments Position on SME House builders

- 1.55 A key component of Labours manifesto and pledge was that it would deliver 1.5 million new homes in the 5 year term and radically seek to overhaul the planning system. Labour recognises the important role housebuilding plays in the countries economic success and wants to get 'Britain Building again and deliver economic growth'. Alongside the planning and infrastructure bill a revised NPPF was consulted on and released in December 2024.
- 1.56 The consultation version was consulted on in September 2024. It provided positive steps towards improving the planning system and seeking to ensure homes were delivered. This included simplifying the plan making process. The consultation acknowledge the issue



surrounding SME Developers, but suggested that no immediate amendments to the NPPF were identified to be implemented at that time.

Revised NPPF – December 2024

1.57 The December 2024 NPPF did indeed make radical changes to the planning system. It introduced the concept of Grey-Belt, amended the standard methodology for calculating housing need and made those figures mandatory and sought to place greater emphasis on delivery of infrastructure, affordable homes and Local Plans.

1.58 As anticipated, the SME component was left unchanged.

1.59 However, in May 2025, a planning reform working paper relating to Site Thresholds was released. This consultation acknowledges the need to support SME's recognised the strength of feeling that current policy around smaller developments is not working for local planning authorities or SME developers. It further states:

The paper primarily explores the simplification of planning requirements for the smallest of sites and the introduction of a medium-sized site threshold within the planning system – in recognition of the particular needs of this scale of development. These changes aim to provide certainty to the sector, ensure the planning system is more targeted and proportionate across different scales of development, and help small and medium builders (SMEs) deliver the homes our communities need.

1.60 The introduction continues:

SME builders play a crucial role in driving up housebuilding rates – by bringing diversity and competition to the market and supporting faster build out rates. SMEs build out the majority of small sites, which supports the efficient use of land, maximises opportunities for gentle densification, and responds to local housing needs. They also contribute to thriving, successful places through the provision of associated infrastructure which supports new development. That is why supporting SMEs forms a key pillar of the upcoming Long-Term Housing Strategy.

However, this part of the sector has faced significant challenges in recent years – a third of SME developers have ceased operating over the last two decades, and the largest developers have become increasingly dominant – accounting for roughly 90% of volume growth. Recent analysis from the Federation of Master Builders (FMB) highlights ongoing



challenges, with the proportion of planning permissions granted on sites with 1 to 9 units having steadily declined over the past 13 years, falling from 21% in 2010-11 to 9.3% in 2023-24 – a marked reduction from previous contributions by SMEs. Addressing this trend, reducing risks and costs, and removing barriers to entry is key to supporting the government’s ambitions for a reformed housebuilding system, with SMEs playing a leading role.

- 1.61 Whilst the final outcome of the consultation is not yet known, there are a number of proposals which would seek to support the SME sector, including minor, small and medium size sites. The recognition of simplifying the process, reducing burden and costs is welcomed and long overdue. These reforms do represent a major step change in support of SMEs and if SMEs are to be the backbone of the housebuilding industry, need to be implemented and delivered.

C. Conclusion

- 1.62 The role of SMEs has been fully recognised by successive Central Governments (both in the House of Commons and House of Lords) and the wider Industry (HBF, NLP) in how important their role is to helping deliver the now 1.5m homes in the next term target. Constraints to SMEs have been identified, including that the plan-led system is orientated away from encouraging SMEs into the market and access to finance.
- 1.63 The 2024 NPPF has some provision within it to specifically address this issue with a clear direction to Local Planning Authorities that 10% of all its housing requirements should be on sites that are 1ha or less i.e. approx. 35 dwellings and under per site. This is aimed at SME developers who deliver at or around this scale.
- 1.64 Most recently the Government's consultation to reform small and medium size sites is welcomed and acknowledges the commitment to supporting SMEs and recognising their role in meeting housing demand.

The Kent SME Developers Network

June 2025

APPENDIX C

Public Exhibition Leaflet

Land South of Downs Road, Istead Rise

Public Consultation Event

ESQUIRE
DEVELOPMENTS



Esquire Developments are hosting a public consultation for a residential development of up to 160 residential dwellings at the site known as Land South of Downs Road, Istead Rise.

We would like to invite you to view the proposals, where we will present and explain our vision.

You are welcome to come and discuss any matters you have with Esquire Developments and their consultant team. Any feedback received will be taken into account and help shape the emerging designs.

If you are unable to attend the exhibition, the material will go live on our consultation website (on the day of the exhibition) where you will be able to view the material and provide feedback online at:

www.consult-esquire.com

The Event will be held at:

**1st Istead Rise
Scout Group Hall
191 Downs Road
Istead Rise
DA13 9HF**

**Monday 2nd June
from 1pm to 7pm.**

APPENDIX D

Public Exhibition Boards



Introduction



Welcome to our exhibition for the emerging development proposals for land located to the south of Downs Road, Istead Rise.

This exhibition is an opportunity for us to present and explain our vision, which currently consists of an Outline application for up to 160 dwellings of which half will be affordable housing.

We have a number of representatives from Esquire Developments and our consultant team to discuss any issues or concerns you may have and to address your individual questions. We are keen to hear your feedback to help shape our proposals as we move forward. Comments can be submitted to us today via a paper form or sent to us by post or email: isteadrise@esquiredevelopments.com by Friday 20th June 2025.

The material on display today is also available to download on our website: www.consult-esquire.com where comments can also be submitted online.

