

NICHOLSONS

Green Belt Assessment

Client: M Scott Properties Ltd

Site: Higham, Gravesham

Date: 22nd January 2026

Revision: **V2**



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Rev	Description of Change	Date	Initial
D1	Original Draft	17.11.2025	AB
QC	Quality Check	09.12.2025	ID
V1	Final Version	11.12.2025	AB
V2	Minor amendments following client comments	21.01.2026	AB

1. Introduction

- 1.1 Nicholsons has been instructed by M Scott Properties Ltd to undertake a Green Belt Assessment in respect of an outline planning application for up to 50 dwellings on land to the west of School Lane, Higham, Kent.

Scope

- 1.2 This assessment will evaluate the contribution, if any, the Site makes to the Green Belt purposes contained within the National Planning Policy Framework (NPPF).
- 1.3 It will also consider in particular purposes a), b) and d), whilst also considering whether the areas and assets within footnote 7 of the NPPF (other than Green Belt) would provide a strong reason to refuse or restrict development of the Site.

- 1.4 This will then allow an assessment to be made as to whether the Site can be identified as Grey Belt land, and if development of the Site would fundamentally undermine the overall 5 purposes of the remaining Green Belt beyond the Site boundaries.

- 1.5 Finally, the assessment will also consider the potential impact of development on the openness of the Green Belt, in both spatial and visual terms.

Site Location

- 1.6 The land in question is comprised of a single, small arable field located along the northern edge of the village of Higham, Kent.
- 1.7 The Site occupies an approximate area of 2.80 hectares and the Site central grid reference is TQ 71179, 71822.

- 1.8 The settlement of Higham is a nucleated settlement focused around Villa Road and Forge Lane, however extends north along School Lane with pockets of development, including Higham Primary School and Preschool, finally adjoining the smaller settlement of Lower Higham to the north.



Figure 1: The Site

2. Existing Background Information

Policy Background

National Planning Policy Framework (NPPF)

- 2.1 The latest version of the NPPF was published in December 2024, replacing a previous version of this document. It sets out the Government's planning policies for England, and how these should be applied, as well as setting out a framework for the production of locally prepared housing and development plans.
- 2.2 National Green Belt Policy is set out within paragraphs 142- 160 of the National Planning Policy Framework. In particular, paragraph 142 states that the essential characteristics of the Green Belts are their openness and permanence, whilst paragraph 143 sets out the five purposes to be served by the Green Belt, as follows:
- Purpose a): To check the unrestricted sprawl of large built-up areas;
 - Purpose b): To prevent neighbouring towns merging into one another;
 - Purpose c): To assist in safeguarding the countryside from encroachment;
 - Purpose d): To preserve the setting and special character of historic towns; and
 - Purpose e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.3 Paragraphs 145-147 set out the framework for Local Authorities to alter Green Belt boundaries as part of the plan-making process.
- 2.4 Paragraphs 153-160 discuss considerations for proposals affecting the Green Belt. This section notes that any harm to the Green Belt should be given substantial weight, and inappropriate development

should not be approved unless very special circumstances exist.

- 2.5 Paragraph 155 states that development in the Green Belt would not be considered inappropriate if it utilises Grey Belt land, contributes to an unmet need, is sustainably located, and complies with the 'Golden Rules'. This assessment will focus solely on the Green Belt and Grey Belt.

- 2.6 **Grey Belt** land within the glossary section of the NPPF is described as follows:

"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes a), b) or d) in paragraph 143. 'Grey belt' excludes land areas or assets in footnote 7 (other than Green Belt) that would provide a strong reason for refusing or restricting development."

Planning Practice Guidance (PPG)

- 2.7 The latest PPG with regards to Green Belt was published in February 2025, and sets out guidance and advice on the role of the Green Belt in the planning system.
- 2.8 The PPG sets out guidance on how to assess Green Belt land in order to identify Grey Belt land and how to deal with development proposals upon Grey Belt land.
- 2.9 This Green Belt Assessment will follow the guidance contained within the revised PPG.

Existing Evidence Base: Adopted Local Plan

Local Plan - Gravesham Local Plan Core Strategy (2014)

- 2.10 Within the Gravesham Local Plan Core Strategy, it is noted that a Green Belt boundary review will be undertaken.
- 2.11 Policy CS02 (Scale and Distribution of Development) states that:
- "A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt."*
- "The Green Belt boundary review will identify land that is unnecessary to keep permanently open, to provide land for development. It will also identify land for safeguarding to meet development needs beyond the plan period. The national and local purposes of including land in the Green Belt, the potential for adding land to and removing land from the Green Belt and consideration of wider sustainability principles will all be taken into account in the review process. Any changes to the Green Belt boundary will be included in the Site Allocations and Development Management Policies DPD and shown on the Policies Map."*
- 2.12 It is acknowledged that this policy is now over 10 years old, and precedes the recent changes made to both the NPPF and PPG with regards to Green Belt policy.
- 2.13 The latest NPPF and PPG policies and guidance on Green Belt and the potential to identify land as grey belt, now supersedes these local policies, and will form the main part of this Green Belt Assessment.

Gravesham Stage 1 Green Belt Study (2018)

- 2.14 The Gravesham Green Belt Study provides a high level assessment of the Green Belt in Gravesham district in terms of its contribution to the five purposes of the Green Belt.
- 2.15 The Green Belt area is subdivided into parcels, with the Site and the settlement of Higham located within Green Belt Parcel 3, however lying adjacent to Green Belt Parcel 5 to the immediate east.

Gravesham Stage 2 Green Belt Study (2020)

- 2.16 The Gravesham Stage 2 Green Belt Study in combination with the Stage 1 study, forms part of a wider body of work intended to inform the production of the Council's Site Allocations and Development management Policies and the partial review of the Local Plan Core Strategy.
- 2.17 The Stage 2 study provides a more specific spatial assessment of harm to the purposes of the Green Belt focused on land around the urban areas and rural settlements inset from the Green Belt, identifying these areas as Green Belt sub-parcels.
- 2.18 Whilst it is considered that this assessment is now largely superseded by the NPPF and PPG updates, these local Green Belt Assessments will be considered with regards to the Green belt sub-parcel within which the Site is located.



Figure 2: Aerial Photo

3. Gravesham Borough Council Green Belt Study Analysis

Gravesham Green Belt Study Stage 1

- 3.1 The Gravesham Green Belt Study Stage 1 assesses the whole of the Green Belt in Gravesham in terms of its contribution to the five purposes of the Green Belt.
- 3.2 The Gravesham Green Belt Study Stage 1 was published in 2018 on behalf of Gravesham Borough Council to inform the production of the Council's Site Allocations and Development Management Policies and the partial review of the Local Plan Core Strategy.
- 3.3 Within Stage 1 of the Gravesham Green Belt Study, the identified Green Belt parcels were assessed against the original purposes of the NPPF, namely Purpose 1 (Check the unrestricted sprawl of large built-up areas), Purpose 2 (Prevent neighbouring towns merging), Purpose 2a (an additional purpose to consider the contribution each parcel plays in preventing settlements inset from the Green Belt from merging with each other), and Purpose 3 (Safeguarding the countryside from encroachment).
- 3.4 Purposes 4 and 5 have not been assessed within the Gravesham Green Belt Study Stage 1.
- 3.5 Each Green Belt parcel was assessed against the purposes noted above using a traffic light system of: Significant contribution, Contribution or Minimal/No contribution.
- 3.6 The Stage 1 assessment places the Site within Green Belt parcel 3, lying adjacent to Green Belt parcel 5 to the immediate east.
- 3.7 With regards to Green Belt Purpose 1, the study identifies that Parcel 3 has Minimal/No contribution to this purpose in its ability to check the unrestricted sprawl of large built up areas. This is because the Green

Belt parcel does not abut a large built up area, namely Gravesend and Strood/Rochester, and therefore has no contribution to Purpose 1.

- 3.8 With regards to Purpose 2, the study identifies that Parcel 3 makes a Significant contribution to this purpose in its ability to prevent neighbouring towns merging.
- 3.9 The study notes that,
'this parcel, in combination with other parcels, plays a significant role in preventing Gravesend merging with Strood and maintaining the break in built development between them.'
- 3.10 Both Gravesend and Strood/Rochester are located between 2-3km away from the Site. Given the very small scale of the Site, it is judged that its influence upon the much larger Green Belt parcel is likely to be very limited.
- 3.11 The Site is considered to be contained against the settlement edge, with road infrastructure and some residential development along the Sites' western and eastern boundaries, along with some residential development to the immediate north-east of the Site.
- 3.12 Any proposed development would be contained against the settlement edge. The retention and enhancement of boundary vegetation will ensure that the Site continues to have a landscape and visual relationship with the existing settlement edge, and remain largely separated from the wider open countryside.
- 3.13 With regards to Purpose 2a, this is an additional purpose within the Stage 1 Green Belt Assessment which considers the contribution each parcel plays in preventing settlements inset from the Green Belt from merging with each other, and it is therefore not a valid Purpose for the consideration of NPPF policy.

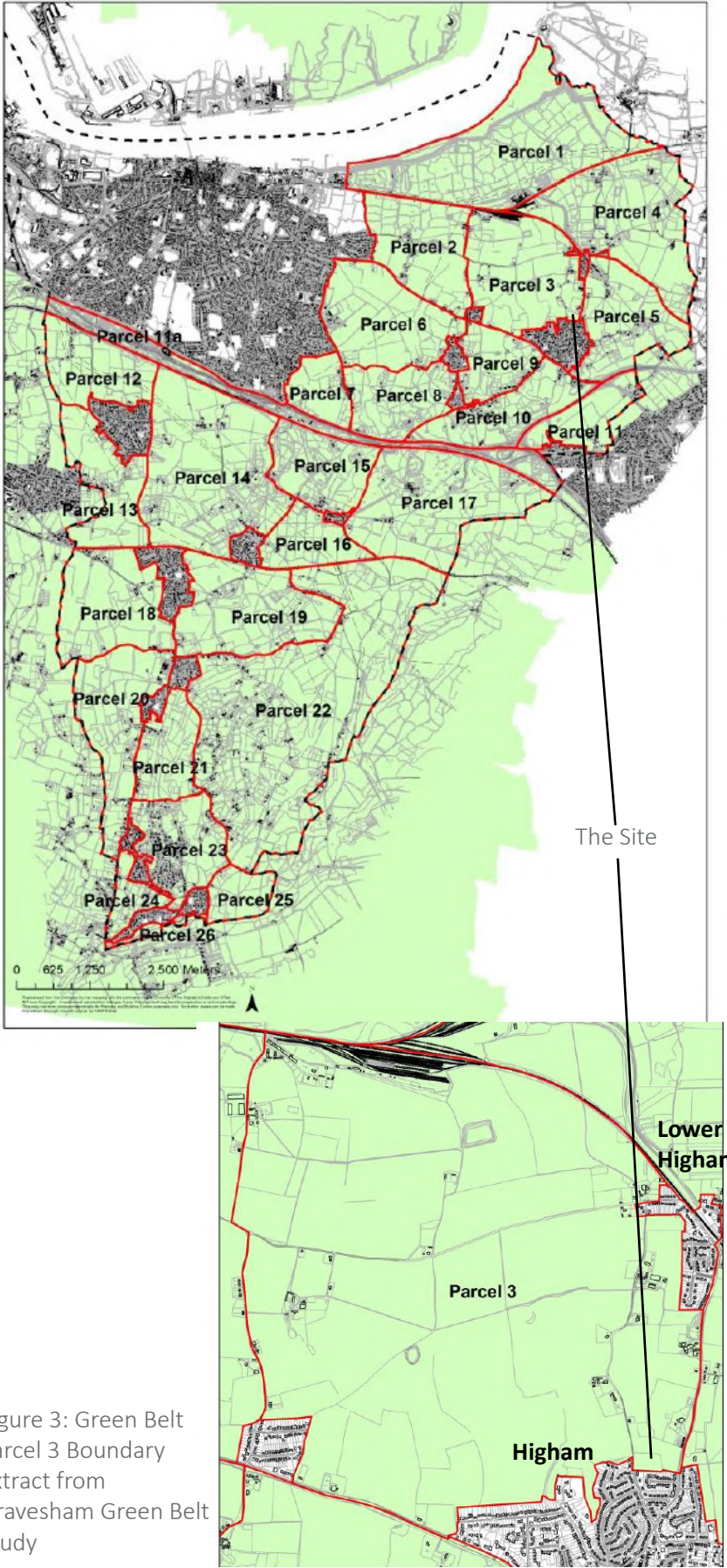


Figure 3: Green Belt Parcel 3 Boundary extract from Gravesham Green Belt Study

3.14 Green Belt parcel 3 is judged within the study to make a Significant contribution to this purpose. The study notes that,

‘The gaps between Higham and Lower Shorne and Higham and Lower Higham are narrow. In the latter case there is already a significant amount of development in the gap between the two settlements, both within the parcel to the west of School Lane and in parcel 5 to the east of School Lane. This development includes Higham Primary School, the Knowle restaurant and Vicarage Row, a terrace of dwellings. The presence of this development makes this part of the parcel particularly important in preventing any further merging of the settlements. Overall, it is considered that this parcel plays a significant contribution in preventing settlements from merging with each other.’

3.15 It is acknowledged that Vicarage Row, comprised of a number of terraced dwellings, lies at the north-eastern corner of the Site.

3.16 However, it is judged that the Site already feels connected to the settlement of Higham, along with the existing residential development to the east of the Site along School Lane, and Vicarage Row which is visible from the settlement edge of Higham.

3.17 It is also judged that the remaining Green Belt parcel to the north of the Site remains largely open, with two arable fields separating the Knowle Country House from Higham Primary School, which itself lies separated by two small fields from the settlement of Lower Higham.

3.18 The Site abuts the settlement of Higham and feels connected to it, and its development would not extend development any further north or west than currently exists, with a small number of dwellings lying to the west of Taylor’s Lane along the Site’s western boundary.

3.19 With regards to Purpose 3, safeguarding the countryside from encroachment, the study identifies that Green Belt parcel 3 makes a Significant contribution to this purpose. The study notes that,

‘The open nature of the parcel and its rising topography make it visible from roads in the vicinity. This landscape character, together with its primarily agricultural use, means that it plays a significant contribution towards safeguarding the countryside from encroachment and preserving the openness of the Green Belt.’

3.20 As a result of the existing settlement edge to the south, as well as some built form and road infrastructure to the west, east and north-east, it is considered that encroachment into the countryside through the development of the Site is unlikely given the existing man-made and natural boundaries.

3.21 The presence of mature vegetation along much of the Site’s northern boundary effectively isolates the Site from Knowle Country House and parkland to the north, which itself feels more open.

3.22 Whilst the north-western edge of the Site feels more open and shares some connection to the wider open countryside, it is proposed to retain more of an open edge along this boundary, with development focused more within the centre of the Site and adjacent to the existing settlement edges.

3.23 The western boundary of the Site is proposed to contain an area for grassland and shrub planting, in order to create a green buffer between the wider open countryside to the north-west and the proposed development, whilst retaining open views.

Gravesham Green Belt Study Stage 2

3.24 The Gravesham Green Belt Study Stage 2 considers the extent of the harm to the purposes of the Green Belt of releasing land around the urban areas and rural settlements inset from the Green Belt within the

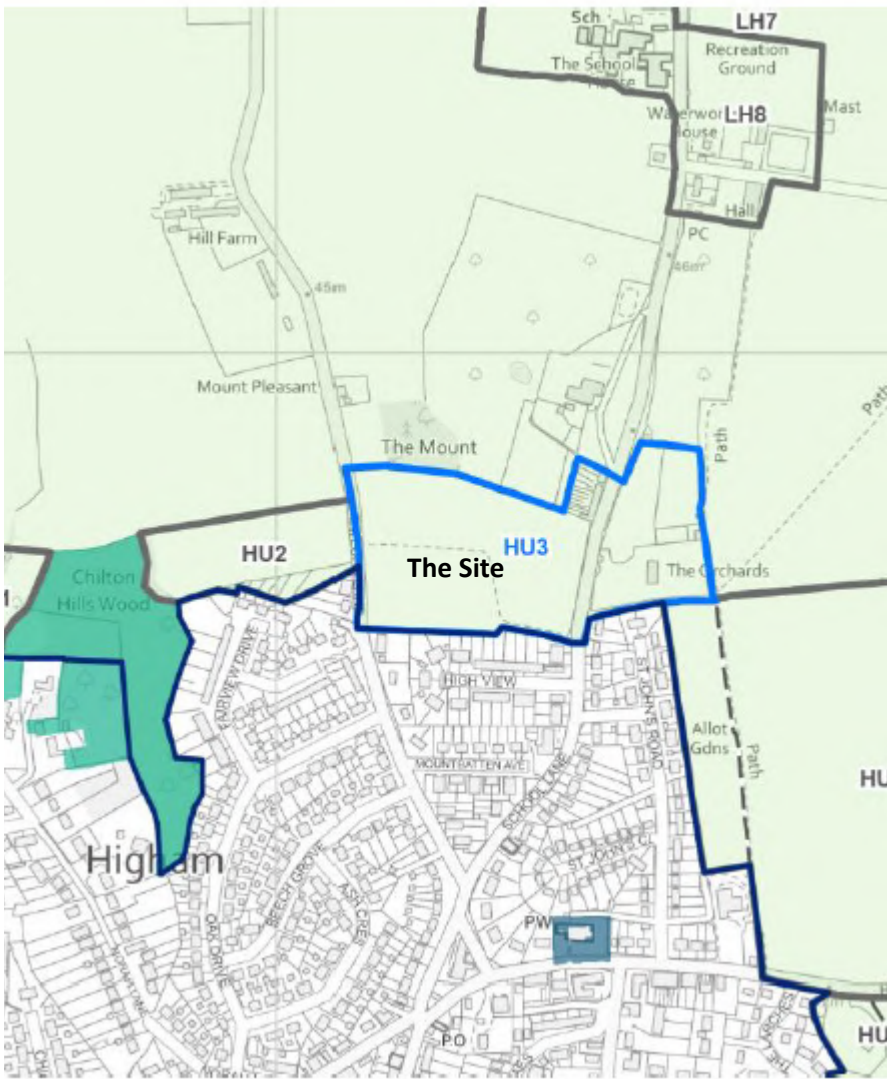


Figure 4: Extract from Gravesham Green Belt Study Stage 2

Borough.

3.25 The Site is entirely encompassed within Green Belt parcel HU3 which also extends east beyond School Lane, with numerous other Green Belt parcels identified along various sections of the settlement edge of Higham.

3.26 The study describes parcel HU3 as follows:

"Area of slightly elevated arable farmland adjacent to the northern edge of Higham, between Taylors Lane

and School Lane, together with a terrace of dwellings fronting School Lane and a residential dwelling and associated land to the east of School Lane. The arable field contains no urbanising development to diminish openness, but there is a limited degree of containment from washed-over development along School Lane, which has a minor urbanising influence, and residential garden boundaries provide minimal distinction from the inset urban area. The parcel's northern boundary is defined by a hedgerow, strengthened at its western end by a woodland block. The dwelling and associated paddocks to the east of School Lane blurs the distinction between settlement and countryside here, and has an impact on openness within its immediate surrounds."

- 3.27 With regards to the NPPF Green Belt Purposes 1 , 2 and 4, the study identifies Limited/No contribution to these purposes, as a result of the distance of the parcel from larger settlements namely Strood/ Rochester and Gravesend, and the intervening built form and vegetation. The parcel is described as having *'insufficient association with the wider countryside'*.
- 3.28 With regards to Purpose 3, the study identifies this parcel to make a Moderate contribution to assisting in safeguarding the countryside from encroachment. The parcel is judged to be perceived as countryside, however the study also suggest that there is a lack of significant distinction from the urban edge of Higham, along with the presence of washed-over development along School Lane, which further enhances its relationship with the urban edge.
- 3.29 With regards to the impact of releasing the parcel from the Green Belt in terms of the contribution of adjacent land to the Green Belt purposes, the study suggests that it would have a Minor impact on the farmland to the west of the Site, suggesting that the mature vegetation along the Site's northern edge would create a stronger boundary than the current

inset settlement edge.

- 3.30 Finally, the overall harm to the Green Belt purposes that would result from its release are judged within the study to be Moderate. It is suggested that the release of the parcel from the Green Belt would constitute moderate encroachment on the countryside and a minor weakening of the integrity of the adjacent Green Belt land.

4. Contribution of the Site to the NPPF Green Belt purposes

Introduction

4.1 This section will present our assessment of the contribution of the Site itself to the initial 4 purposes of the Green Belt as set out in Paragraph 143 of the NPPF. It is considered that the 5th purpose is largely intended to ensure that urban brownfield land is the primary consideration for development, and is therefore not relevant to this context.

Purpose a) To check the unrestricted sprawl of large built-up areas

- 4.2 The settlement of Higham is a small village, and therefore as a result it is not considered that it forms a large built up area, and therefore does not in our opinion contribute to Purpose a). However, an assessment of the Site against Purpose a) will still be undertaken.
- 4.3 The village of Higham is surrounded by open countryside, with the nearest large built up area located approximately 2km away to the south-east at Rochester. This settlement is also separated from the Site by the A289.
- 4.4 To the south of the Site, the existing settlement of Higham is visually dominant through views of residential dwellings and rear gardens along the immediate southern boundary, as well as views of the wider settlement located on the rising land to the south.
- 4.5 The presence of some residential dwellings at the Site's north-eastern corner, and along part of its western and eastern boundaries, serve to contain the Site and contribute to its settlement edge character.
- 4.6 It is judged that the proposed residential development

will extend a small distance to the north, and will lie within the context of the existing residential development to the north of the Site, in the form of a row of houses along School Lane, as well as Higham Primary and Pre-Schools lying further north along School Lane, creating the impression of ribbon development along this road.

- 4.7 The presence of built form to the north, south and east creates a robust and defensible boundary and serves to contain the Site against the existing village.
- 4.8 The potential for urban sprawl of large built up areas as a result of the proposed development is therefore considered unlikely, as a result of the physical barriers and distance that separate it from adjacent large built up areas.
- 4.9 Therefore, it is considered that the Site does not make a contribution to Purpose a), and that the proposed development would not lead to the unrestricted sprawl of large built up areas, as a result of its location adjacent to a small village and not a large built up area, and the natural and man-made containment afforded to the Site by the existing settlement and mature vegetation within the immediate setting.

Purpose (b): To prevent neighbouring towns merging into one another

- 4.10 The settlement of Higham is a small village, however PPG (2025) is clear that Purpose b) relates to towns, which we do not consider Higham to be.
- 4.11 The village is bound to the south by the A289, which serves to create a hard boundary separating Higham from the larger town of Rochester located over 2km to the south-east.
- 4.12 The small villages of Shorne and Lower Higham are located to the west and north of the Site respectively, however are separated from the village by open

countryside, over 700m away. These settlements are small villages and are not considered to be towns.

- 4.13 The next nearest large town is that of Gravesend, located over 3km to the west.
- 4.14 Given the distance from these large built up areas and other smaller settlements, and the presence of road infrastructure and existing built form creating a barrier between the Site and settlements, it is considered that the Site does not make a contribution to Purpose b) of the Green Belt, and that the proposed development would not lead to neighbouring towns merging into one another.
- 4.15 It is worth noting that as part of the Site Allocations: Issues and Options document, a Broad Location Options plan for residential development, highlights the settlement of Higham for potential expansion as well as the potential to merge with Lower Higham.

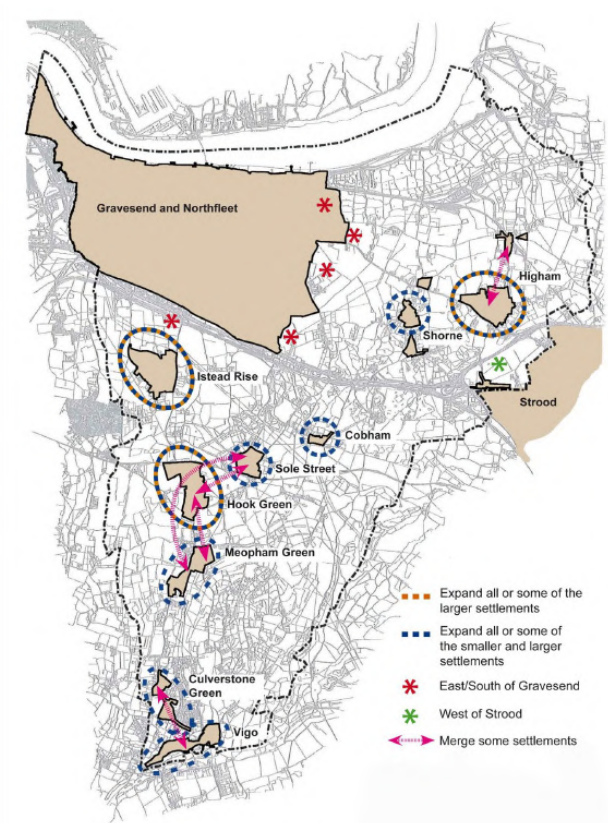


Figure 5: Extract from Site Allocations: Issues and Options

Purpose (c): To assist in safeguarding the countryside from encroachment

4.16 As a result of the existing settlement edge to the south, as well as some built form and road infrastructure to the west, east and north-east, it is considered that encroachment into the countryside through the development of the Site is unlikely given the existing man-made and natural boundaries.

4.17 The presence of mature vegetation along much of the Site’s northern boundary effectively isolates the Site from the Knowle Country House and parkland to the north, which itself feels more open.

4.18 Whilst the north-western edge of the Site feels more open and shares some connection to the wider open countryside, it is proposed to retain more of an open edge along this boundary, with development focused more within the centre of the Site and adjacent to the existing settlement edges.

4.19 The western section of the Site is proposed to remain open with areas for water attenuation, landscape planting and open space, in order create a green buffer between the wider open countryside to the north-west and the proposed development.

4.20 Therefore, it is considered that the Site will not encroach into the wider open countryside, and will be well contained against the existing settlement edge, thereby assisting in safeguarding the countryside from encroachment.

Purpose (d): To preserve the setting and special character of historic towns

4.21 Purpose d of the Green Belt purposes is specifically related to historic towns, of which Higham is not specifically designated as, with modern development located throughout the village. The village is not designated as a Conservation Area, with the nearest

Conservation Area located at Lower Higham to the north of the Medway Canal.

4.22 It is therefore judged that purpose d does not apply to the Site.

4.23 In conclusion, it is judged that the Site does not make a contribution to purposes a), b), c) or d) of the Green Belt.

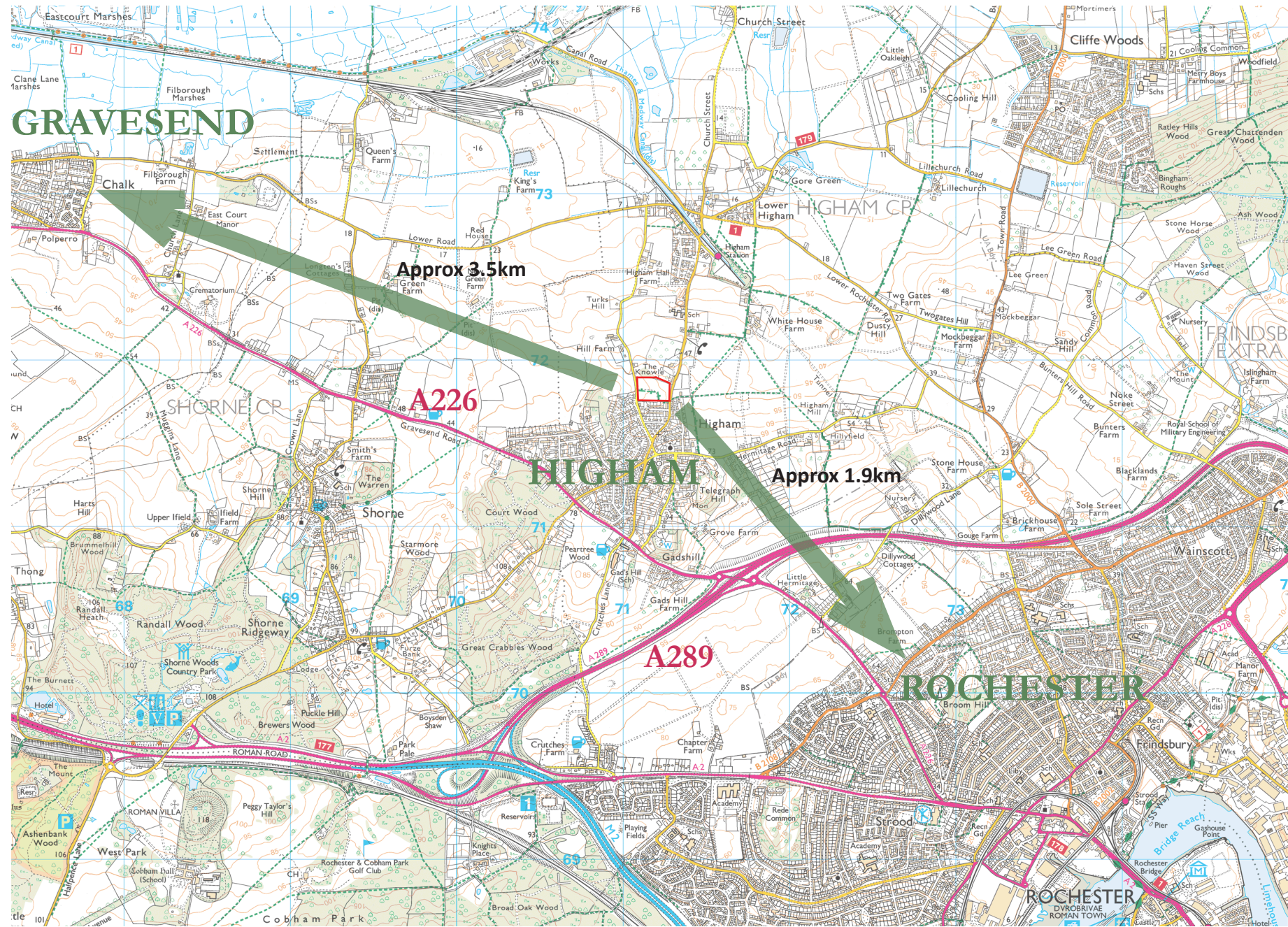


Figure 6: Distances to nearest large built up areas

5. Grey Belt Assessment (PPG)

5.1 This section will assess the Site in particular against Purposes a), b) and d) of the NPPF, as noted within the PPG, as well as taking into consideration footnote 7, to make an assessment as to whether the Site can be identified as Grey Belt land.

5.2 PPG Paragraph 005 Reference ID: 64-005-20250225 states that,

“When making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d.”

Purpose A – to check the unrestricted sprawl of large built up areas	
This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.	
Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Extract from Paragraph: 005 Reference ID: 64-005-20250225

5.3 PPG Paragraph 005 sets out a series of considerations to inform judgements, as noted below. This assessment will consider each of these judgments with regards to the Site and the proposals.

Purpose A - to check the unrestricted sprawl of large built up areas

5.4 It is noted that Purpose A relates to large built up areas, and the PPG considerations identify that villages should not be considered large built up areas. Whilst Higham is identified to be a village and cannot therefore contribute to Purpose A, an assessment of the Site will still be undertaken against Purpose A in order to present a robust assessment.

5.5 It is considered that the Site does not contribute strongly or moderately to Purpose A in that it does not lie adjacent to or near to a large built up area. The nearest large built up area is located nearly 2km to the south-east at the settlement of Strood/Rochester and is physically separated from the village and the Site by the A289 (Hasted Road).

5.6 Whilst the small village of Lower Higham lies within 1km of the Site at approximately 0.6km to the north, this cannot be considered to be a large built up area.

5.7 It is also judged that development of the Site would not result in an incongruous pattern of development, but would represent a logical extension for the residential dwellings in terms of settlement pattern. The proposed development would extend north and terminate at the boundary of Knowle Country House and associated parkland, separated from it by mature boundary vegetation.

5.8 The presence of some residential dwellings along part of the Site’s western, eastern and northern boundaries means that the Site feels partially enclosed by the settlement edge. Given the presence of residential dwellings at the Site’s north-eastern corner, it is judged

that the proposed development would not extend the settlement of Higham any further north, west or east than it currently exists.

5.9 Therefore it is our opinion that the Site’s contribution to Purpose A is None.

Purpose B – to prevent neighbouring towns merging into one another	
This purpose relates to the merging of towns, not villages.	
Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Extract from Paragraph: 005 Reference ID: 64-005-20250225

Purpose B - to prevent neighbouring towns merging into one another

5.10 As with Purpose A, Purpose B is concerned with towns and not villages. Whilst Higham is identified to be a village and cannot therefore contribute to purpose B, an assessment of the Site will still be undertaken against Purpose B in order to present a robust assessment.

- 5.11 It is considered that the Site does not contribute strongly or moderately to Purpose B in that it does not form a substantial gap between towns. As previously mentioned, Higham is not itself a town, and is separated from the nearest town (Strood/Rochester) by the A289, almost 2km away to the south-east.
- 5.12 The next nearest large town is located over 3km away to the west at Gravesend. All other settlements within 1-2km of the Site are considered to be villages.
- 5.13 Given the distance between the larger towns and the small size of the Site, it is considered that development

Purpose D – to preserve the setting and special character of historic towns	
This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.	
Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town

Extract from Paragraph: 005 Reference ID: 64-005-20250225

of the Site would not result in the loss of the visual separation of these towns.

- 5.14 It is also judged that as a result of the settlement of Higham being categorised as a village and not a town, it cannot contribute to the weakening or loss of a gap between towns. Therefore, it is our opinion that the Site’s contribution to Purpose B is None.

Purpose D - to preserve the setting and special character of historic towns

- 5.15 The settlement of Higham is a village and not a town, and cannot therefore contribute to Purpose D.
- 5.16 It is also noted that Higham is not designated as an historic town, and there are none lying within the setting of the Site. Therefore it is considered that the Site does not form a part of the setting of a historic town and in our opinion its contribution to Purpose D is None.
- 5.17 With regards to making an assessment of whether land is grey belt, PPG states that,

“After consideration of the above criteria, any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.”

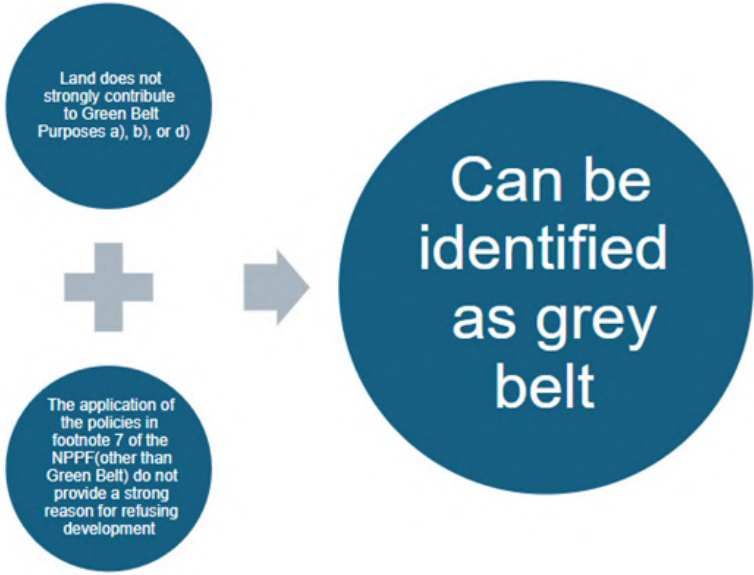
[Paragraph: 007 Reference ID: 64-007-20250225]

- 5.18 It has been judged above that whilst the settlement of Higham and the Site is a village, and therefore cannot contribute to Purposes a), b) or d), our assessment of the three purposes against the Site as a standalone area also shows that it does not contribute strongly or moderately to any of these three purposes.

- 5.19 Footnote 7 of the NPPF relates to,

“habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”

- 5.20 The Site and its setting are not designated, other than Green Belt land, under any of the designations listed within Footnote 7 of the NPPF.
- 5.21 Therefore it is our opinion that the Site can be identified as grey belt.



6. Consideration of the impact upon the remaining Green Belt

Assessment upon the openness of the Green Belt

- 6.1 This Green Belt Assessment has identified that the proposed development would not extend the settlement edge any further west or east than it currently exists, and would be contained against the existing settlement edge to the south.
- 6.2 It is judged that the Site represents a small field immediately adjacent to the existing settlement edge, and represents a natural 'rounding off' of this part of the settlement boundary.
- 6.3 Open countryside of parkland and small pasture and arable fields continue to separate the settlements of Lower Higham and Higham beyond the Site boundary to the north.
- 6.4 The Site feels contained by significant built form to the south, with some built form also present along a section of the Site's western and eastern boundaries, as well as at its north-eastern corner, thereby creating a transitional sub-urban character across the Site. Mature vegetation along the Site's northern boundary further contains the Site from the wider open countryside to the north.
- 6.5 It is judged that the proposed development of the Site will not prevent the remaining parcel to the north from preventing the merging of Higham and Lower Higham.
- 6.6 As a result, this open countryside to the north of the Site will remain open, with views of the proposed development either restricted by existing built form and mature vegetation within the immediate setting, or viewed within the context of the existing settlement edge.
- 6.7 It is judged that the wider Green Belt parcel 3 within the Gravesham Green Belt Study Stage 1, is a relatively small Green Belt parcel that covers an area of land between the settlements of Higham, Lower Higham and a small group of dwellings to the east of Green Farm Lane.
- 6.8 In terms of spatial openness, it is acknowledged that the Site is comprised of a single arable field, and therefore there would inevitably be a loss of spatial openness as a result of the proposed residential development.
- 6.9 With regards to visual openness, whilst the perception of openness is apparent, particularly to the north and west of the settlement of Higham, it is considered that the Site itself is largely contained along the northern settlement boundary of Higham, with mature vegetation lying to the north of the Site.
- 6.10 Views within the wider parcel are generally expansive, stretching to the north and west, however topographic undulations do restrict some views in places.
- 6.11 It is judged that the existing and proposed vegetation within and surrounding the proposed development will serve to reduce any potential intervisibility between the Site and the wider Green Belt parcel.
- 6.12 It is therefore judged that the proposed development of the Site would not cause harm to the visual openness of the wider Green Belt parcel 3.
- 6.13 With regards to the impact upon the remaining Green Belt parcel, should development within the Site be approved, it is judged that the Site forms only a very small part of Green Belt parcel 3, and lies within a settlement edge context.
- 6.14 With regards to purpose 1, it is judged that the proposed development within the Site would not prevent the remaining parcel from checking the unrestricted sprawl of large built up areas, given that Higham is a village and cannot be considered a built up area, and any nearby large built up areas are located 2-3km away, separated from the Site by road infrastructure and built form.
- 6.15 With regards to Purpose 2, it is judged that the proposed development of the Site would not prevent the remaining Green Belt parcel from preventing the merging of neighbouring towns. The village of Higham cannot be considered a town, and the nearest towns are located 2-3km away from the Site.
- 6.16 With regards to Purpose 3, it is judged that the proposed development of the Site would not prevent the remaining Green Belt parcel from safeguarding the countryside from encroachment, given its small size in relation to the overall parcel, and its settlement edge location.
- 6.17 Therefore, based upon our own assessment, it is judged that the proposed development of the Site would not prevent the wider Green Belt parcel 3 from serving the 5 Green Belt purposes, as well as an additional purpose as noted within Gravesham Green Belt Study Stage 1.
- 6.18 The Green Belt Study Stage 2 suggested that moderate harm could arise in the release of the local HU3 parcel from the Green Belt, however acknowledges that the Site is well contained by the settlement edge to the south and mature vegetation to the north, and is closely associated with the urbanising features both along the settlement edge and along School Lane.

7. Illustrative Landscape Strategy

7.1 In order to ensure that the proposals can be successfully integrated into this setting, a number of potential design principles have been identified. These include:

- Wide landscape buffer within north-western and north-eastern corners of the Site, to enable habitat creation, green infrastructure, facilitate drainage and recreation, as well as to retain key views to the north-west.
- Much of the existing boundary vegetation will be retained and enhanced, with the exception of a small amount of removal along the eastern boundary to facilitate vehicular access.
- Retention of existing Public Right of Way within its original position.
- Street tree planting, as well as shrub beds where space allows, to create areas of shade, green infrastructure, biodiversity net gain and visual interest.
- Use of locally native species where appropriate, to ensure that the proposals are in keeping with and positively respond to the character of the Site, its setting and the wider landscape context.

7.2 The illustrative design strategy outlined above seeks to ensure that the proposals relate positively to the character of the Site and its setting, and do not appear incongruous when viewed from the wider landscape setting.



Figure 7: Illustrative Landscape Design Strategy

8. Conclusions

- 8.1 It is the conclusion of this Green Belt Assessment that the Site does not contribute to Purposes (a), (b) or (d), because it is located adjacent to the village of Higham, which itself is not a town or large built up area, and the Site cannot be considered to be covered by, nor would it affect designations (other than Green Belt) within footnote 7 of the NPPF.
- 8.2 The development of the Site was also found not to undermine all five of the Green Belt purposes taken together over the Local Plan area, and therefore taking all of these factors into consideration, we believe that the Site fully meets the definition of Grey Belt, as highlighted within Para 009 of the PPG (2025), and as a result, development of the Site would not be considered inappropriate according to paragraph 155 of the NPPF.
- 8.3 Gravesham Borough Council's own Stage 1 Green Belt Study found that Green Belt Parcel 3 made no contribution to purpose 1, and a significant contribution to purposes 2 and 3. However, given the very small scale of the Site in relation to the overall Green Belt parcel, and its location within a settlement edge setting, it is judged that the Site's influence upon the wider Green Belt parcel is likely to be very limited.
- 8.4 Gravesham Borough Council's Stage 2 Green Belt Study found that Green Belt Parcel HU3 made a limited/no contribution to purposes 1, 2 and 4, with a moderate contribution to purpose 3. However the study also suggested that *'there is a lack of significant distinction from the urban edge of Higham'*, contributing to the transitional sub-urban character of the Site.
- 8.5 It is judged that given the small size of the Site in relation to the wider Green Belt parcels within which it lies, as well as the lack of large built up areas and towns within the immediate setting of the Site, the proposed development of the Site would also not in our opinion, prevent the wider Green Belt from serving the five purposes of the Green Belt.
- 8.6 The Site exhibits a transitional sub-urban character as a result of its close association with the existing settlement edge.
- 8.7 The Site is considered to be a natural progression of the settlement to the south, and as a result of some built form to the west, east and north-east, could be considered to be 'rounding off'.
- 8.8 New areas of informal open space and areas for play will be created within the northern sections of the development, along with areas of tree and shrub planting, and street tree planting, creating attractive areas of green space with opportunities for public access, recreation and Biodiversity Net Gains.
- 8.9 In terms of the effect upon the openness of the Green Belt, whilst spatial harm is inevitable as a result of construction within the countryside to address unmet housing need, the containment of the Site within a vegetated context and its close association with the existing settlement edge is such that it is considered that there would be no harm to the visual openness of the wider Green Belt.

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