
Landscape and Visual Appraisal and Green Belt Assessment

Land at GAD'S HILL SCHOOL

For Gad's Hill School

August 2025

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1.0 INTRODUCTION

- 1.1 EDLA were appointed by Gad's Hill School to undertake a Landscape and Visual Appraisal and Green Belt Assessment, (LVA) in respect of the following 'Proposed Development':

"Retention of the Hewlett Pavilion and ancillary buildings on a permanent basis with associated external alterations."

- 1.2 With reference to **Figure L01: Site Context Plan**, the existing buildings within the Site are located in the north-east part of Gad's Hill School and in proximity to Gad's Hill Place, the former home of Charles Dickens, an internationally renowned author. The building were granted temporary planning permission, with the buildings completed in 2004.
- 1.3 The Site is not covered by any landscape related designations, nor does it contain any rare or distinctive landscape features due to the utilitarian character of the buildings. The Site is within a part of the landscape assessed by the Gravesham Landscape Sensitivity and Capacity Study as having a low capacity for single storey buildings, including primary schools, such that they would likely give rise to significant adverse landscape and visual effects.
- 1.4 **Figure L01: Site Context Plan** also demonstrates that the Site is within the Green Belt, for which there are spatial and visual matters associated with the concept of 'openness'. The National Planning Policy Framework also introduces 'Grey Belt', for previously developed land, or land that does not strongly contribute to the Green Belt purposes.
- 1.5 The LVA therefore identifies the 'present day' landscape and visual character of the Site and surrounding area, via desk-based reviews of relevant evidence based studies and fieldwork. The LVA then sets out the likely landscape and visual effects of the temporary (existing) buildings within the Site and the Proposed Development and whether they are significant or not in relation to the Gravesham Landscape Sensitivity and Capacity Study. The LVA concludes with a Green Belt assessment of the Site, the likely impact to the openness and whether the Site is Grey Belt or not.
- 1.6 The LVA has been undertaken by Chartered Landscape Architects with extensive experience of educational schemes and Green Belt assessments. The LVA is undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA 3) and should be read in combination with the drawings for determination and supporting Architectural, Heritage Statement, Design and Access and Planning documents. Whilst the LVA considers the cultural heritage value of the Site and Gad's Hill Place, all assessments relating to heritage are within the Heritage Statement.

2.0 THE SITE AND ITS IMMEDIATE SETTING

The Site

- 2.1 With reference to **Figure L01: Site Context Plan**, and the following extract of the Architectural Location Plan, the Site ('red line boundary'), covers the Hewlett Pavilion and ancillary buildings within the north-east part of Gad's Hill School and in proximity to Gad's Hill Place, the former home of Charles Dickens.

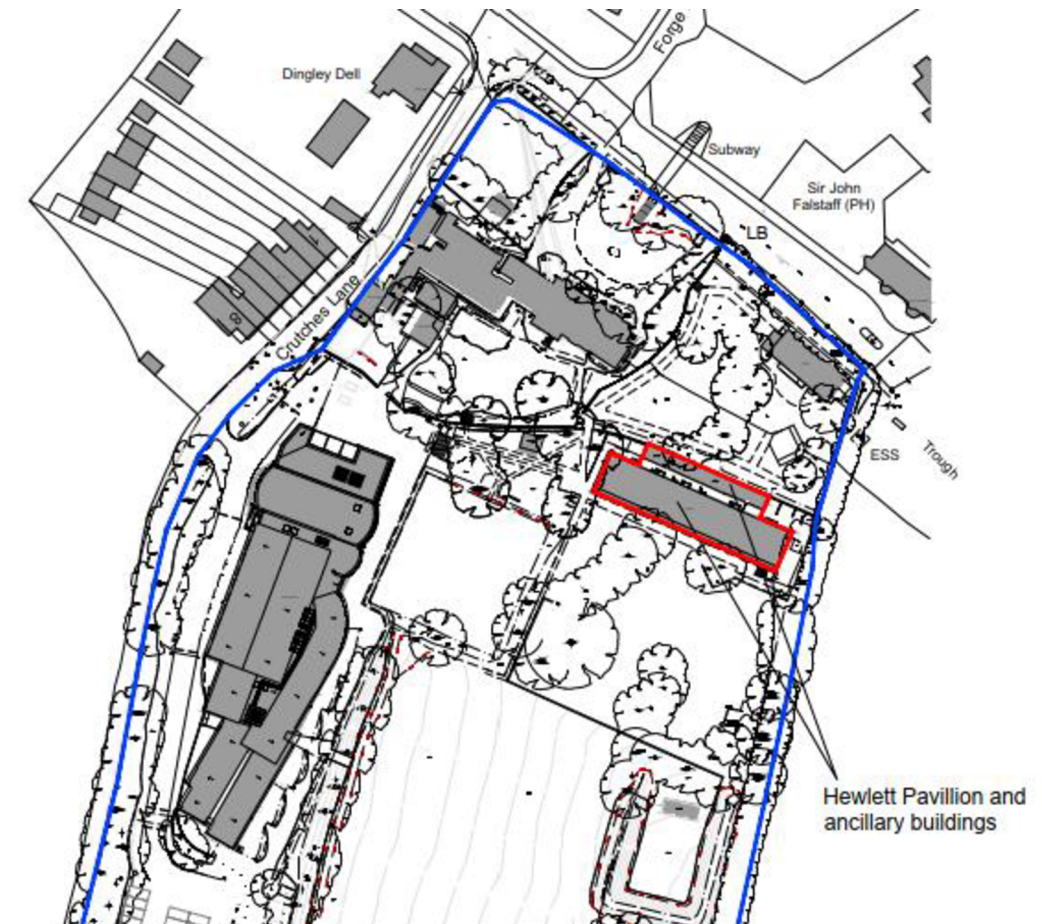


Image 2-1: Extract of the Architectural Location Plan.

- 2.2 With reference to the Planning Statement, the existing buildings within the Site provide essential teaching spaces, as in integral part of the wider education facilities, which include classrooms in Gad's Hill Place.
- 2.3 The Hewlett Pavilion is rectangular in form, extending for 48m in length along the its northern and southern elevations. The building is a black timber clad building with a terracotta composite metal roof (red in colour), except for at the eastern end of the building, where there is a flat roof extension. There are timber steps along the northern façade and a timber veranda along the southern façade.
- 2.4 The ancillary building to the immediate north of the Hewlett Pavilion consists of sheds with flat roofs, built into the retaining wall of the former kitchen garden, in a similar rectangular form.

- 2.5

The Site is situated around 72 metres (m) Above Ordnance Datum (AOD), forming a very localised area of engineered landform to enable the footprint of the existing buildings.
- 2.6

The Site does not consists of any vegetation due to the existing buildings and their external hardstanding.
- 2.7

The Site is not covered by any landscape related designations, nor is it within or adjacent to a Conservation Area. The Site is not crossed by any Public Rights of Way.
- 2.8

The existing buildings are considered to be utilitarian in style, without any architectural merit, nor articulation. The proximity to existing vegetation provides a high degree of physical enclosure to the existing buildings.
- 2.9

The Site is of low landscape value.

The Site’s Immediate Setting

- 2.10

The Site is bound by:
 - Vegetation and the walled garden to the north;
 - Established vegetation forming the eastern edge of the school to the east of the Site;
 - Individual mature oak and horse chestnut trees and the jungle gym to the south; and
 - Buildings within the school, including Gad’s Hill Place to the west and north-west.
- 2.11

With reference to **Figure L02: Topography Plan**, the surrounding landform is at a similar elevation as the Site, varying between 70m Above AOD and 75m AOD.
- 2.12

With reference to **Figure L01: Site Context Plan**, the existing arrangement of buildings across Gad’s Hill School is concentrated to the west and north-west of the Site. The playing fields and outdoor spaces are to the south of the Site, such that the Site is in a more ‘developed’ part of the school.
- 2.13

With reference to the Heritage Statement, Gad’s Hill Place is a Grade I¹ listed buildings, which was owned and occupied by Charles Dickens, with the surrounding wider landscape a stated inspiration for many of his novels. Key views from the upper storeys of the eastern part of the building, include from Dicken’s bedroom (Image 2-1) and the conservatory, from which there are views of the Site. The Heritage Statement sets out that the existing buildings in the Site result in a level of harm to Gad’s Hill Place.

¹ Historic England, List UID: 1049037, <https://historicengland.org.uk/listing/the-list/list-entry/1049037?section=official-list-entry>

3.0 SITE CONTEXT

LVA Study Area

- 3.1

With reference GLVIA 3, the purpose of the LVA study area is to identify the geographic area propionate to the Site and the Proposed Development in respect of likely landscape and visual effects from the Proposed Development.
- 3.2

The study area has been determined through fieldwork, reviews of aerial mapping and published landscape character assessments, as set out an in the following sections. With reference to the **Site Context Plan**, the study area extends to:
 - Residential land uses across Higham, 100m to the north of the Site;
 - The A289 and rural land uses, 1.4 kilometres (km) to the east of the Site;
 - Rural and residential land uses at Three Crutches, 1km to the south of the Site; and
 - Rural land uses and residential land uses at Shorne Ridgeway, 1.5km to the west of the Site.
- 3.3

The following section sets out the key landscape features across the study area.
- Landform and Hydrology**
- 3.4

With reference to **Figure L02: Topography Plan**, there are no notable watercourses within the study area. The landform rises very gradually to the north of the Site, across Higham, due to the convergence of Gad’s Hill and Telegraph Hill. The landform culminates in a ridgeline at approximately 95m AOD, 200m to the north-east of the Site.
- 3.5

To the east of the Site, the landform falls across Gad’s Hill to the valley floor, situated between 35m AOD and 40m AOD and broadly demarcated by the alignment of the A289. From the valley floor, the landform rises to the western edge of Rochester, and residential land uses adjacent to Gravesend Road, at around 70m AOD.
- 3.6

The landform also falls to the south of the Site and the valley floor, situated around 55m AOD and similarly demarcated by the alignment of the A289. From the valley floor, the landform rises to Three Crutches and Old Watling Street, with residential land uses situated at around 83m AOD, 1km to the south of the Site.
- 3.7

To the west of the Site, the landform rises to form a plateau of land at around 80m AOD, before rising to form a ridgeline along the alignment of Peartree Lane, around 105m AOD, which extends across to Shorne Ridgeway.

3.8 The Site is therefore situated across the upper parts of Gad’s Hill, which along with Telegraph Hill and elevated land adjacent to Peartree Lane, forms the northern aspect of a localised valley system. The landform falls to the east and south of the Site, across Gad’s Hill, to form the southern side of the valley, which culminates at a ridgeline across Old Watling Street.

Settlement Pattern

3.9 With reference to **Figure L01: Site Context Plan**, the settlement pattern is mainly concentrated to either the upper parts of the valley or the valley floor, such that the valley sides are mainly characterised by agricultural land uses.

3.10 Higham is the largest settlement pattern within the study area, extending to the north of the A226, in a clustered arrangement of dense residential streets, with numerous cul-de-sacs and avenues. Properties across the southern part of Higham are a range of bungalows, two storey semi-detached and terraced properties. Buildings materials are predominantly red brick with dark red roof tiles. There is also a consistent arrangement of off-street parking.

3.11 In addition to residential land uses to the north of the Site, there are also properties in Charles Dickens Avenue, 100m to the east of the Site and like the Site, beyond the defined settlement boundary of Higham. Charles Dickens Avenue is characterised by large scale, two storey detached properties, set within well vegetated gardens. Building materials are predominantly red brick across the ground level and mock Tudor upper storeys, consisting of white render and black stained timber. Detailing to the facades includes brick chimney or crenelated roof lines. There is also a small commercial area within the eastern part of these properties, consisting of several single storey brick buildings and agricultural sheds as part of Gad’s Hill Farm.

3.12 In closer proximity to the Site, properties adjacent to Crutches Lane consist of a terraced row of two storey properties, set back from Crutches Lane by small gardens bordered by a low timber fence. The properties have consistent light brown brick facades with red brick detailing around white windows. The exception is one property which is pebble dashed. All properties have dormer windows within the roof line and porches above the doorways. There is a detached property at the junction of Crutches Lane and the A226, which is also two storeys in height, with light brown brick, low stone walls and a veranda across the northern façade.

3.13 Residential land uses at Three Crutches, in the southern part of the study area are a mix of bungalows and two storey detached brick properties on the southern side of Crutches Lane. The properties have off-street parking and generally open boundary treatments. Towards Old Watling Street, two storey detached brick properties extend to both sides of Crutches Lane.

3.14 Shorne Ridgeway is a ribbon settlement, 1.5km to the west of the Site, extending adjacent to Pear Tree Lane and Tanyard Hill.

3.15 Beyond these residential areas, agricultural land uses are characterised by medium to large scale fields which are open in character.

3.16 The main road network is the A289, which extends along the valley floor, to converge with the M2, 1.3km to the south-west of the Site. The A289 converges with the A226 via a roundabout, 600m to the east of the Site. From the roundabout, the A226 extends west towards the Site and east towards Rochester. Crutches Lane is the only road between the A226 and Rochester across the southern part of the study area.

Vegetation Patterns

3.17 With reference to **Figure L01: Site Context Plan**, the main areas of woodland within the study area are to the west of the Site, extending between the A226 and the A289 via Court Wood and Great Crabbles Wood; both of which are ancient woodlands.

3.18 There is also woodland to the east of the Site, across the upper parts of Gad’s Hill and Telegraph Hill. Other notable tracts of vegetation are adjacent to the A289, with narrow belts of woodland along the upper parts of the road embankment. Crutches Lane is also well vegetated, between the A289 and A226, with tall hedgerows, but the extent of vegetation bordering the lane is substantially reduced to the south of the A289.

3.19 The agricultural land use results in an open character to the fields across the study area, with narrow hedgerows often dividing the individual fields.

Public Rights of Way (PRoW) and Access

3.20 With reference to on-line mapping², the PRoW in the surrounding landscape are:

- The Charles Dickens Literary Walk (Charles Dickens and Higham), along Forge Lane and Telegraph Hill Road, via part of the A226, to the immediate north of the Site;
- PRoW (footpath) 0123/NS150/1, across Telegraph Hill, 400m to the east of the Site;
- PRoW (footpath) 0123/NS117/1, across the lower lying parts of Gad’s Hill, 400m to the south of the Site. Although the on-line mapping illustrates this PRoW terminating at the A226, the route connects with Crutches Lane;
- PRoW 0229/NS321/1 (footpath), extending through Great Crabbles Wood, 450m to the west of the Site.

² Kent County Council, <https://webapps.kent.gov.uk/countrysideaccesscams/standardmap.aspx>

3.21 There is also public access to Great Crabbles Wood park, 625m to the south-west of the Site.

Designations

3.22 With reference to **Figure L01: Site Context Plan**, the Kent Downs National Landscape is 1.3km to the south-west of the Site, extending around Shore Ridgeway and to the south of the M2.

3.23 There are no Conservation Area in proximity to the Site.

3.24 The Sir John Falstaff Public House³ (Grade II) is 20m to the north-east of the Site. With reference to the on-line listing, the relevance is with regards to the architectural details, rather than any relationship to the Site.

4.0 PUBLISHED LANDSCAPE CHARACTER ASSESSMENTS AND RELATED STUDIES

4.1 The Site and study area are covered by several published landscape character assessment, which support the planning policy evidence base and provide guidance on the management of future change. The relevant extracts are included in **Appendix II** and summarised below.

National Level

4.2 The Site is covered by Natural England’s National Character Area (NCA) 113: North Kent Plain⁴ (NCA 113) which is an extensive area, extending between Bromley and Ramsgate. The published study describes NCA 113 as:

“The area is open, low and gently undulating. It is a very productive agricultural area with predominantly high-quality, fertile loam soils characterised by arable use. Traditional orchards, soft fruits and other horticultural crops exist in central and eastern areas giving rise to the use of the title ‘Garden of England’.”

4.3 Stated key characteristics relevant to the Site and study area are:

- *“An open, low and gently undulating landscape, characterised by high quality, fertile, loamy soils dominated by agricultural land uses;*
- *Large arable/horticultural fields with regular patterns and rectangular shapes predominating, and a sparse hedgerow pattern; and*
- *Large settlements and urban infrastructure (including lines of pylons) are often visually dominant in the landscape, with significant development around Greater London and the Medway Towns, as well as around towns further east and along the coast. Major rail and road links connect the towns with London.”*

4.4 Relevant Statements of Environmental Opportunity (SEO) are:

- *“Protect and enhance the strong character and heritage of the urban areas. Plan for the creation of significant new areas of green space and green corridors to provide a framework for new and existing development in urban areas and along major transport route (SEO 4).”*

4.5 The published study also notes the strong association with Charles Dickens and used the wider landscape as a setting for many of his novels.

County Level

Landscape Assessment of Kent

4.6 The Landscape Assessment of Kent includes the Site and land between and the A226 and M2 within Landscape Character Area (LCA) Shorne, as demonstrated by the following extract from the published mapping.

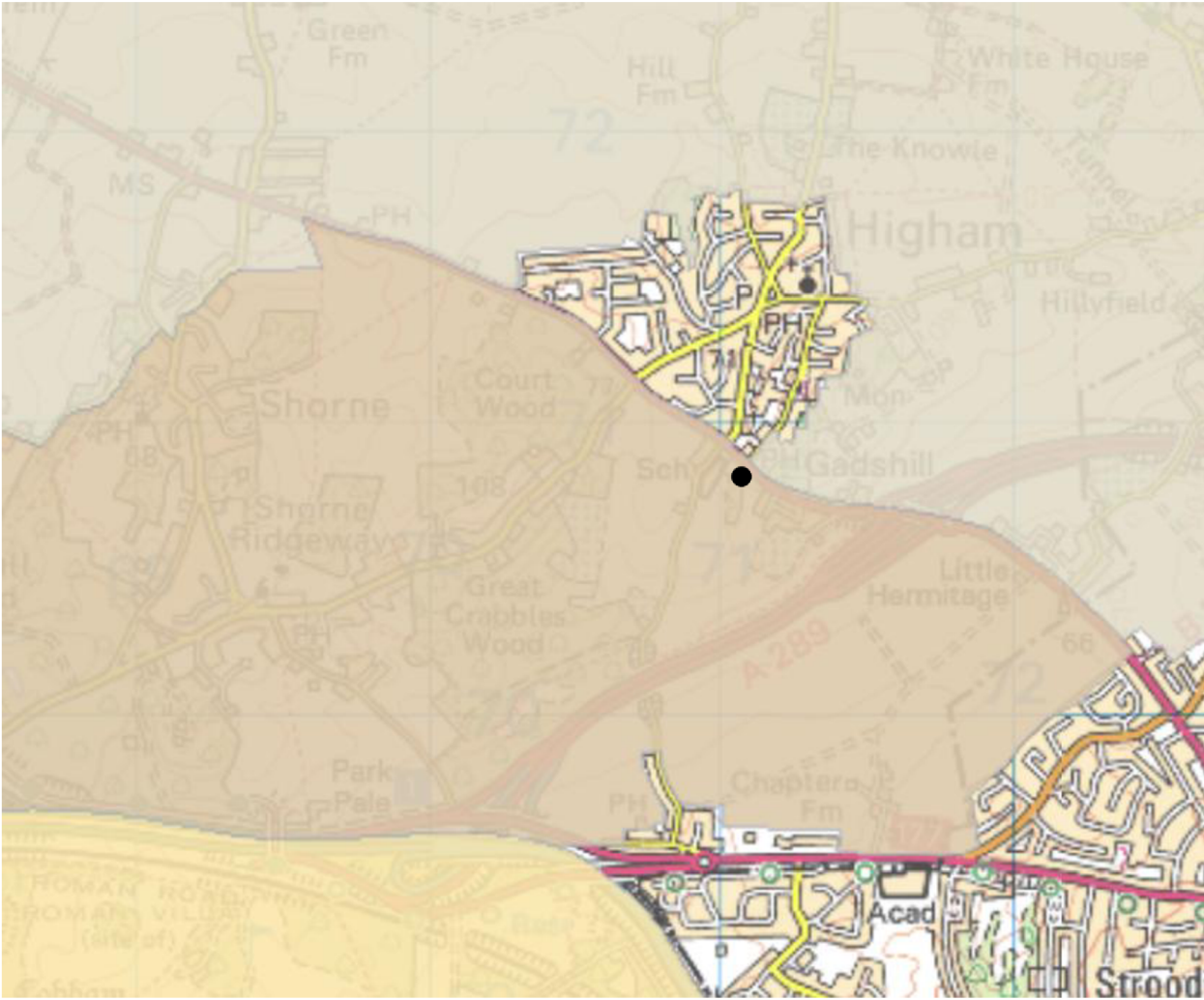


Image 4-1: Extract of the Landscape Character Assessment of Kent, with the centre of the Site illustrated via a black dot.

³ Historic England, list UID: 1096327, <https://historicengland.org.uk/listing/the-list/list-entry/1096327?section=official-list-entry>

⁴ Natural England, National Character Area 113, <http://publications.naturalengland.org.uk/publication/2900242>

4.7 The published study describes LCA Shorne as:

“essentially a wooded ridge within a flatter rural setting that has been severed from the more extensive landscape of similar character to the south by the A2 road corridor. This is a discrete tract of landscape lying between the extensive built-up areas of Rochester and Gravesend. It is bounded to the north by open arable farmland of the Hoo Peninsula.”

4.8 The Site is not representative of the woodland which forms the key characteristic of the LCA, although there are notable trees within the Site. The relevant stated key characteristics of the LCA include a ‘residential ribbon development and hard urban edge’.

4.9 The published study assesses the condition of the LCA as ‘good’ due to a coherent pattern of elements. The sensitivity is assessed as ‘very low’ due to the very low visibility and overall weak sense of place, due to recent development with little local distinction.

4.10 Stated landscape actions are based on a strategy of ‘reinforce’, via creating new woodland links and sympathetic designs and building treatments.

4.11 The published study notes the importance of Charles Dickens and Gad’s Hill within LCA Hoo Peninsula, which is the tract of land to the north of the A226.

Kent Design Guide⁵

4.12 This provides advice on the form, layout, character and quality of development.

SPG1: Landscape Character⁶

4.13 The SPG supplements the policies and proposals of adopted development plans.

Borough Level

Gravesham Landscape Character Assessment, 2009

4.14 The Site is covered by the Gravesham Landscape Character Assessment⁷ and within LCA4: Shorne Woodlands.

4.15 With reference to **Appendix II**, the stated relevant key characteristics of the area are:

- *“Undulating topography;*
- *Strong sense of enclosure;*

- *Varied building style and age; and*
- *Chequered brickwork and ornamental brickwork.”*

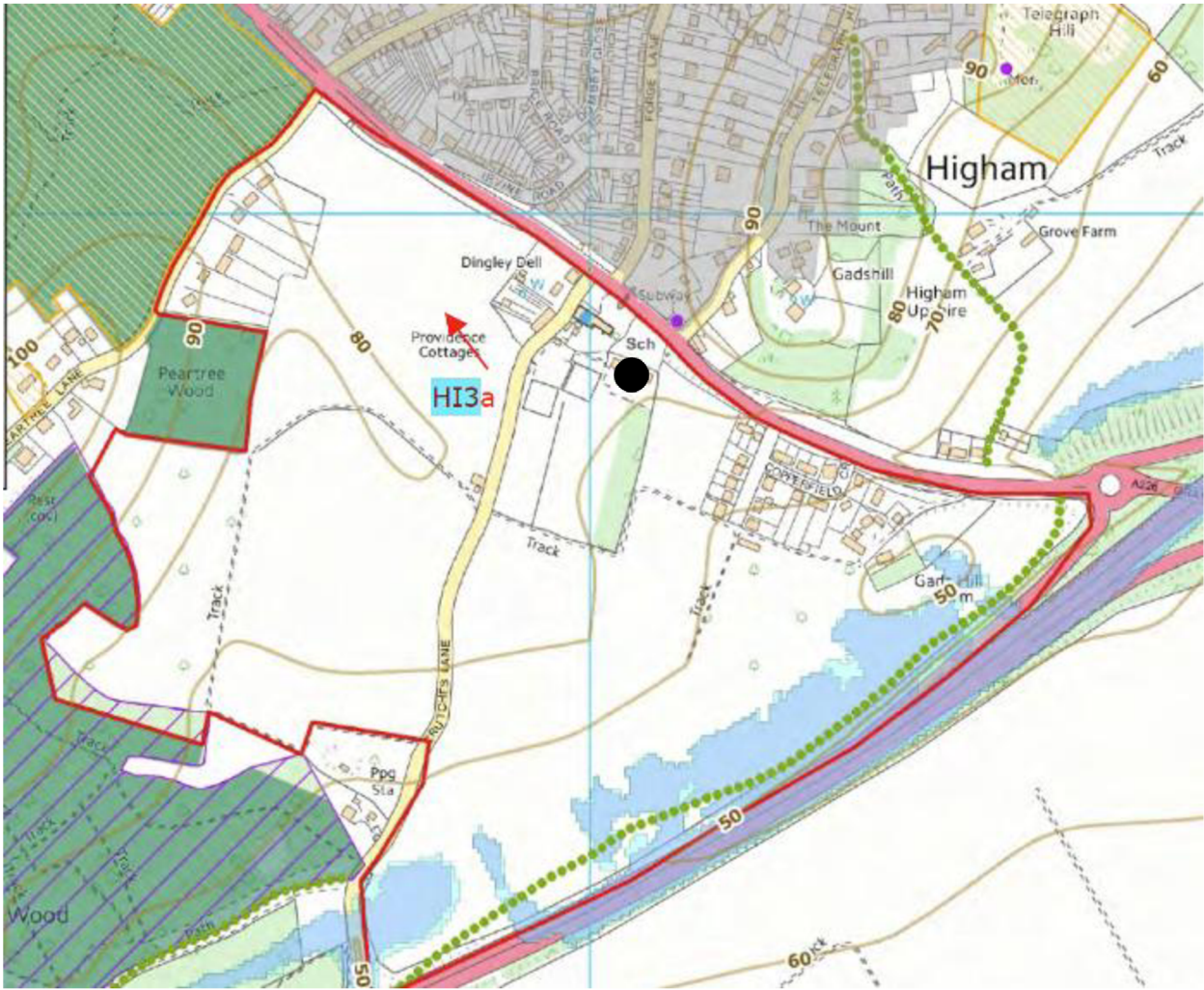
4.16 The published study concludes that the condition of the area is ‘good’, due to the extent of woodland and cultural integrity.

4.17 The published study concludes that the sensitivity of the area is ‘moderate’, again due to the extent of woodland and general low visibility.

4.18 The published guidelines are based on a strategy of ‘conserve and reinforce’, with relevant guidelines including new native tree and hedge planting along field boundaries to increase habitat linkages.

Gravesham Landscape Sensitivity and Capacity Study, 2016⁸

4.19 The Site is within HI3: Higham South-east, as per the following extract from the published study.



⁵ The Kent Design Guide, https://www.kent.gov.uk/__data/assets/pdf_file/0014/12092/design-guide-foreword.pdf

⁶ Kent County Council, <https://www.gravesham.gov.uk/downloads/file/245/landscape-character-sep-2006-spg1>

⁷ Gravesham Landscape Character Assessment, <https://selfservice.gravesham.gov.uk:1443/webdocs/Environment%20and%20Planning/GLP/HER->

01_Gravesham_Landscape_Character_Assessment_May_2009.pdf#_ga=2.73922389.675883043.1642408020-1636781038.1642178276

⁸ Gravesham Borough Council, Landscape Sensitivity and Capacity Study, <https://localplan.gravesham.gov.uk/connect.ti/sareg18/consultationHome#:~:text=Gravesham%20Green%20Belt%20Study%20This%20document%20provides%20the,Green%20Belt%20boundaries%20and%20site%20allocatio ns%2C%20if%20required.>

Image 4-2: Extract of the Landscape Sensitivity and Capacity Study with the centre of the Site illustrated via a black dot.

4.20 The published study describes HI3 as:

“This parcel is strongly bounded, by the A226 Gravesend Road to the north, the A289 Hasted Road to the south-east and woodlands (Court Wood, Pear Tree Wood and Great Crabbles Wood) to the west. All the woodlands are classified as Ancient, and Great Crabbles Wood is also a SSSI. It is mostly arable farmland, with one area of commercial fruit trees on the western edge. There are also three clusters of development: a small housing estate adjacent to Gads Hill Farm, Gads Hill School and neighbouring houses on Crutches Lane (which subdivides the parcel east-west), and linear development along Pear Tree Lane.

The landform generally slopes down from a ridge along Pear Tree Lane, on the north-western edge of the parcel, to a valley bottom just north of the A289, but is more undulating to the west of Crutches Lane.”

4.21 The assessment criterion for the parcel is set out in **Appendix II** and duplicated below in Table 4-1.

Table 4-1: Published Assessment Criterion for HI3: Higham South-east

Assessment Criterion	Published Study Sensitivity Description
Physical and natural character	The northern western corner of the parcel is fairly level and consistent with the landform within the settlement of Higham to the north of the Gravesend Road, but further south and east the land falls away towards the valley floor. The orchard on the western edge of the site is a modern, commercial one, but its location on a fairly strong east-facing slope, surrounded on three sides by Ancient Woodland, is sensitive.
Settlement form and edge	The defined rural settlement of Higham is bounded by the A226 Gravesend Road, with roadside hedgerows limiting intervisibility with the parcel, but the post-war housing development on Charles Dickens Avenue and Copperfield Close introduces a suburban character beyond this edge. The buildings of Gad’s Hill School, and neighbouring cottages, are fairly well contained by trees, as are the more modern houses on Pear Tree Lane.
Settlement setting	The land within the parcel forms part of the wider rural setting of Higham, but has little direct relationship with the settlement
Views	Localised views into this area are very limited, with no public footpaths other than along the valley floor on the southern edge, and only glimpsed roadside views (e.g. View HI3a). There are longer views across the valley from Three Crutches (View HI3b) in which the Charles Dickens Avenue / Copperfield Crescent development is evident, together with partial views of the new main building at Gad’s Hill School (built in 2013), but little of the settlement of Higham is visible
Perceptual Qualities	Road noise from the Gravesend Road is intrusive on the northern edge of the parcel, and the Charles Dickens Avenue / Copperfield Crescent housing is a suburbanising influence. The A289 represents some intrusion to the south, but is visually well screened, and expansive open views to the south, and woodlands to the west, give the area a generally rural character.
Cultural or historical value	Gad’s Hill Place is Grade I listed, but it is its association with Charles Dickens rather than its relationship with its surrounding landscape, or any particular qualities of the building, which give it this importance. There is

⁹ Gravesham Borough Council, Green Cluster Studies, Shorne to Shore, https://selfservice.gravesham.gov.uk:1443/webdocs/Environment%20and%20Planning/GLP/REG-03_Green_Cluster_Studies_Shorne_to_Shore_Technical_Report_January_2011.pdf

Assessment Criterion	Published Study Sensitivity Description
	a line of view from the house towards wooded high ground to the south of the M2, but tree cover limits its relationship with land within the parcel.

4.22 The published study sets out the following sensitivities to development:

- *“Lack of relationship with Higham due to separation by A226 Gravesend Road.*
- *Valley to south and east is a distinctly different landscape area to Higham (as is reflected by character area boundaries in the Gravesham Landscape Character Assessment).*
- *The Charles Dickens Avenue / Copperfield Crescent housing to the south of the A226 is intrusive, and seems disconnected from Higham (including Gadshill).*
- *Rural influence of open views to south and woodlands to west.”*

4.23 The published study identifies one view towards Gad’s Hill School, but not the Site, which is includes in the visual appraisal as viewpoint 10.

4.24 The published study concluded that the capacity for small development (individual or small groups of single storey community buildings, include primary schools) was ‘low’, i.e. it would likely give rise to significant adverse landscape and or visual effects.

Green Cluster Studies⁹

4.25 The Site is included as a ‘significant’ tourism destination and a ‘strength’ of the Shorne to Shore Cluster.

Gravesham Design Code, 2024¹⁰

4.26 The Code sets out the standards for quality development and the importance of well designated places.

4.27 Green roofs are noted for promoting biodiversity, along with the retro-fit of existing building where appropriate to improve resilience to climate change.

¹⁰ Gravesham Borough Council, Design Code, <https://www.gravesham.gov.uk/downloads/file/709/design-for-gravesham-design-code-spd->

5.0 VISUAL APPRAISAL

5.1 Fieldwork has been undertaken from publicly accessible locations and ‘private’ locations within the school, during July 2022 to ascertain the visibility of the Site and the Proposed Development via a series of representative photographs (‘viewpoints’). The location of these viewpoints are illustrated on **Figure L04: Viewpoint Location Plan**, with the photographs presented on the **Site Context Photograph** sheets. The following section sets out the context of views from the viewpoints and should be read in combination with the photographs. Whilst the fieldwork has been carried out in summer, consideration has also been given to winter conditions, i.e. when the deciduous vegetation is not in leaf.

- **Viewpoint 1** is taken from the north side of the A226 and is representative of motorists, pedestrians and residents. The view demonstrates that the density of the roadside vegetation and intervening buildings screens the Site. In winter, the Site would remain not visible, due to being located beyond Gad’s Hill Place;
- **Viewpoint 2** is taken from the junction of the A226 and Crutches Lane and is also representative of motorists and pedestrians. The view demonstrates that the density of the boundary vegetation across the northern parts of the school screens the Site. In winter, the Site would be screened by the density of the vegetation and Gad’s Hill Place;
- **Viewpoint 3** is taken from Crutches Lane and is representative of residents, pedestrians and motorists. The view demonstrates the Site would not be visible in summer or winter conditions due to the intervening buildings;
- **Viewpoint 4** is taken from Crutches Lane, adjacent to the southern edge of the Site and is representative of motorists. The view demonstrates that the Site is not visible due to the density of intervening vegetation. Similarly, the Site would not be visible in winter conditions due to the density of the intervening vegetation;
- **Viewpoint 5** is taken from Forge Lane and is representative of residents, motorists and recreational users. The view demonstrates that the Site is not visible, due to the density of intervening vegetation. In winter, the Site would also remain not visible due to being located beyond Gad’s Hill Place;
- **Viewpoint 6** is taken from the A226 and is representative of motorists and residents. The view demonstrates that a small part of the contemporary school building is visible due to gaps in the roadside vegetation; however the Site is not visible. In winter, the Site would not be visible due to the density of intervening vegetation;
- **Viewpoint 7** is taken from PRoW (footpath) 1023/NS117/1 and is representative of recreational users. The view demonstrates that the boundary vegetation along the southern edge of the school is visible, but the Site is screened by the rising landform and its position beyond the intervening ridgeline. The composition of the view is considered to remain similar in winter, due to the intervening ridgeline screening the Site;

- **Viewpoint 8** is taken from PRoW (footpath) 0229/NS321/2 and is representative of recreational users. The view demonstrates that the Site is not visible due to the density of the intervening vegetation. In winter, the Site is considered to remain screened due to the density of the vegetation;
- **Viewpoint 9** is taken from the southern part of Great Crabbles Wood park and is representative of recreational users. The view demonstrates that the Site is not visible due to the density of the intervening vegetation. In winter, the Site is considered to remain screened due to the density of the vegetation;
- **Viewpoints 10, 11 and 12** are taken from Crutches Lane, to the south of the A289. The views are representative of residents and motorists. The views demonstrates that the Site is not visible due to the density of intervening vegetation and distance. In winter the Site would remain not visible due to the density of vegetation;
- **Viewpoint 13** is taken from the school playing fields and demonstrates that the Site is visible, although largely softened in summer by the density and height of intervening vegetation. In winter, the visibility of the Site would increase; and
- **Viewpoint 14** is taken from Dickens’ former bedroom, in Gad’s Hill Place. The view demonstrates the Site is visible, with the red tone of the roof noticeable in contrast to the green tones of the surrounding vegetation. In winter, with the intervening vegetation not in leaf, the visibility of the Site would increase.

5.2 From the above fieldwork, the Site is not visible from the surrounding landscape. The Site is only visible from internal locations within the school, including Gad’s Hill Place, as demonstrated by the following extract of **Viewpoint 14**.



Image 5-1: View from Dickens’ former bedroom, looking south-east across the Site.

6.0 POLICY RELEVANT TO LVA

6.1 The following section summarises the policies are relevant to landscape and visual matters, with the policies set out in full in **Appendix III**. Green Belt policies are covered in the following chapter.

National Planning Policy Framework, 2024

6.2 The following policies are relevant to landscape and visual matters:

- 8 - outlining that the economic, social and environmental objectives of sustainable development;
- 96 – whereby planning policies and decisions should aim to achieve healthy, inclusive and sage places;
- 124 – whereby planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses;
- 125 – whereby planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes;
- 129 – whereby planning policies and decisions should support development that makes efficient use of land, taking into account the desirability of maintaining an area’s prevailing character;
- 130 – which sets out area-based character assessments can be used to help ensure that land is used efficiently;
- 131 - in respect of achieving well-designed places via high quality, beautiful and sustainable buildings;
- 135 – requiring planning decisions to ensure that development will function well and add to the overall quality of the area, including being visually attractive and sympathetic to local character and history;
- 136- in respect of new tree planting;
- 137 – requiring early consideration of design quality and engagement with communities;
- 139 – which sets out that significant weight should be given to development which promotes high levels of sustainability or that helps raise the standard of design in an area, as long as they fit in with the overall form and layout of the area;
- 142 – which sets out the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open;
- 143 – which sets out the five purposes of the Green Belt;

- 151 – which sets out that once Green Belts have been defined, LPA’s should plan positively to enhance their beneficial use and landscapes, visual amenity and biodiversity;
- 155 – which sets out that development of homes in the Green Belt should not be regarded as inappropriate where the development would utilise ‘grey belt land’ and would be sustainable; and
- 187 – requiring planning decisions to contribute to and enhance the natural and local environment.

National Design Guide, 2021¹¹

6.3 This guide sets out how well-designed places are beautiful in support of the NPPF and states that the well-designed places, buildings and places:

- “have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing towards health and well-being, inclusion and cohesion;
- have a character that suits the context, its history, how we live today and how we are likely to live in the future; and
- are visually attractive, to delight their occupants and other users.”

National Planning Practice Guidance (PPG)

6.4 The following PPG are relevant to the LVA, with Green Belt matters set out in the following chapters:

- Climate change¹² (2019), which advises how to identify suitable mitigation and adaption of measures in relation to the impacts of climate change;
- Design: process and tools¹³ (2019), which refers to the National Design Guide and sets out guidance for making decisions about design;
- Historic Environment¹⁴ (2019), which sets out matters relating to conservation and enhancement of the historic environment;
- Light Pollution¹⁵ (2019), which sets out factors to be considered in relation to implications for light pollution; and
- Natural Environment¹⁶ (2025), which sets out the relevance of landscape character assessments, trees, ecology, mitigating impacts and the importance of Green Infrastructure (GI) and urban cooling.

¹¹ Ministry of Housing, Communities and Local Government, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

¹² Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, updated 2019, <https://www.gov.uk/guidance/climate-change>

¹³ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, updated 2019, <https://www.gov.uk/guidance/design>

¹⁴ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, updated 2019, <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

¹⁵ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, updated 2019, <https://www.gov.uk/guidance/light-pollution>

¹⁶ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, updated 2019, <https://www.gov.uk/guidance/natural-environment>

Gravesham Local Plan

- 6.5 The Local Plan sets out the planning policies that will guide development in the borough. With reference to the on-line policy mapping¹⁷, the Site is covered by the Green Belt designation.
- 6.6 Relevant Strategic Objectives (SO) of the Gravesham Local Plan First Review¹⁸ are:
- SO1: making the most efficient use of land by concentrating development on previously developed land;
 - SO8: Preserve the openness of the Green Belt, maintain its national and local planning purposes and protect it from inappropriate development;
 - SO13: Protect and enhance the Borough’s heritage assets and historic environment;
 - SO14: Ensure that all new development makes a positive contribution to the local character and distinctiveness of the Borough, minimises the risk of crime, responds to climate change, and integrates into the existing built, historic and natural environment; and
 - SO16: Safeguard and enhance the biodiversity of the Borough.
- 6.7 The main document of the Local Plan is the Core Strategy¹⁹, adopted 2014. The relevant policies are:
- CS01: Sustainable Development, which reflects the presumption in favour of sustainable development set out in the NPPF;
 - CS02: Scale and Distribution of Development, which refers to the Green Belt boundary review study;
 - CS12: Green Infrastructure, which sets out the multifunctional network of spaces across the borough will be protected and enhanced;
 - CS13: Green Space, Sport and Recreation, which seeks the protection and enhancement of existing facilities;
 - CS19: Development and Design Principles, requiring new development to be visually attractive and enhance the existing character; and
 - CS20: Heritage and the Historic Environment, which sets out that a high priority will be given towards the preservation, protection and enhancement of the borough’s heritage.
- 6.8 The Local Plan Review²⁰ sets out that no modifications are required to the above policies.

¹⁷ Gravesham Borough Council, https://drive.google.com/file/d/1siQD4461VqiNqziBu0MhCPveA9eKNP_Z/view
¹⁸ Gravesham Borough Council, <https://selfservice.gravesham.gov.uk:1443/webdocs/Environment%20and%20Planning/LPFR-1994/LPFR-Saved-and-Deleted-Policies-Version-Sept-2014.pdf>
¹⁹ Gravesham Borough Council, <https://drive.google.com/file/d/1bJTgQLmhbjqZFibI-5WFb2tbvixXpLk/view>

Neighbourhood Plan

- 6.9 At the time of undertaking the LVA, there were no relevant neighbourhood plans.
- 7.0 LIKELY LANDSCAPE AND VISUAL EFFECTS**
- 7.1 As set out in the introduction, the landscape and visual effects of the existing buildings in the Site are assessed, followed by those of the Proposed Development.
- ASSESSMENT OF THE EXISTING BUILDINGS IN THE SITE**
- 7.2 In landscape terms, the existing buildings are consolidated to a more developed part of the school grounds. They are well enclosed by the surrounding vegetation, which is well established, such that the buildings do not impeded their growth. The building is structurally sound (as set out in the Design and Access Statement) but its appearance is tired, such that at the Site scale, the landscape impact is negligible and the effect is negligible adverse.
- 7.3 In relation to the published landscape character areas, the existing buildings are not perceived and do not alter the landscape character. This is considered to be reflected in the conclusions of the Appeal for the permanent retention of the existing buildings (APP/K2230/W/20/3261674²¹) in 2021. Paragraph’s 25 and 26 of the Inspector’s decision state:
- “Nor would the development have an adverse effect on the rural character of the wider area, taking into account its setting within the educational use of the site as a whole. The appeal site does not contribute to the distinctive features identified within the GCA and the removal of the pavilion would not lead to any longer term reinforcement of the wooded character, as it would remain part of the wider school grounds;*
- I therefore conclude that the proposal would not have a harmful effect on the character and appearance of the area and would comply with Policy CS12 of the CS which seeks to conserve, restore or enhance the landscape character of areas identified within the GCA.”*
- 7.4 Therefore, the landscape effects to the published landscape character areas are assessed as neutral.
- 7.5 Visually, the existing buildings only visible from the school grounds and Gad’s Hill Place. In views from the school grounds, the single storey height and black timber façade of the Hewlett Pavillion aid in

²⁰ Gravesend Borough Council, <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.gravesham.gov.uk%2Fdownloads%2Ffile%2F299%2Flocal-plan-review&wdOrigin=BROWSELINK>
²¹ The Planning Inspectorate, https://docs.gravesham.gov.uk/PublicAccess_Live/Document/ViewDocument?id=C879A90DB7E611EB8FB9E226BB3BE258

reducing its visibility, more so in summer than in winter. Given views from within the school are of a lower sensitivity, the impact is assessed as negligible and the effect as negligible adverse.

7.6 From Gad’s Hill Place, the existing buildings are visible, mainly due to the red tone of the tiled roof. Whilst the buildings do not prevent views across the wider countryside, the red roof is notable, such that the impact is moderate and the effect is minor adverse.

Summary of the Existing Building Assessment

7.7 From the above, the following table summarises the predicted landscape and visual effects from the Proposed Development.

Table 7-1: Landscape and Visual Effects Summary of the Existing Buildings.

Landscape / Visual Receptor	Winter	Summer
The Site	Negligible adverse	Negligible adverse
NCA 113	Neutral	Neutral
LCA Shorne	Neutral	Neutral
LCA 4: Shorne Woodlands	Neutral	Neutral
School users	Negligible adverse	Negligible adverse
School users and visitors to Gad’s Hill Place	Minor adverse	Minor adverse

7.8 The existing buildings would therefore not result in landscape effects to the surrounding area, with the lowest tier of landscape effects at the Site level, due to the tired condition of the building. Visually, there would be negligible to minor adverse effects of the existing buildings, mainly due to views from Gad’s Hill Place, across the red tone roof of the Hewlett Pavillion.

ASSESSMENT OF THE PROPOSED DEVELOPMENT

7.9 With reference to the drawings for determination, the design changes relevant to the LVA and Green Belt assessment are the replacement of the roof panels with a new green roof and the replacement of the black cladding with a natural timber boards.

Likely Landscape Effects

Site Character

7.10 At the Site character scale, the Proposed Development would result in a beneficial change to the architectural quality and scenic quality of the Hewlett Pavilion. This is because the natural timber boards will provide a more recessive tone which is more sympathetic to the vegetated setting of the building, and the varying oxidation of the timber will provide a visual interest.

7.11 The monotonous style and notable red tone of the existing roof would be replaced with the soft form of the green roof, with a range of colour tones to reflect the surrounding vegetation. The green roof would respond positively to the Gravesham Design Code, which notes that green roofs promote biodiversity and improve the resilience to climate change.

7.12 The benefits of green roofs are set out by a number of organisations, including the Landscape Institute and the Royal Horticultural Society. The stated benefits of green roofs are due to:

- Biodiversity – the range of plants attract pollinators and support ecological food networks;
- Cooling – plants absorb heat and cool the air via respiration, with roof temperatures noted as being between 15-10 degrees cooler than conventional roofs;
- Pollution – plants on green roofs (like all plants) filter the air to reduce pollution; and
- Flooding – green roofs slow and absorb rainfall, reducing pressure on surface water drainage systems, particularly in urban areas.

Published Landscape Character Areas

7.13 The Proposed Development would respond positively to the statements of environmental opportunity for NCA 113, via the green roof providing increased opportunities for a green corridor within existing development. With reference to the Heritage Statement, the Proposed Development will more than halve the harm of the existing Hewlett Pavilion, thereby the Proposed Development would enhance the strong character and heritage value of Gad’s Hill Place in comparison to the existing building. With the Proposed Development representing a very small change, there would be no change to the character of NCA 113 and the effects are predicted to be neutral and not significant.

7.14 In respect of LCA Shorne, there would be no change to the key characteristics of woodland and trees due to the Proposed Development refurbishing existing buildings. The Proposed Development would respond positively to the stated landscape actions by the green roof and new façade providing a sympathetic design and building treatment in relation to the wooded setting of the Site and its proximity to Gad’s Hill Place. With the Proposed Development representing a very small change, there would be no change to the character of the LCA and the effects are predicted to be neutral and not significant.

7.15 At the borough scale, the Proposed Development would be located in LCA4: Shorne Woodlands. With the Proposed Development located across existing engineered landform, there would be no change to the stated key characteristics of undulating topography. There would also be no change to the strong sense of enclosure due to the retention of surrounding vegetation. The green roof would respond positively to the stated landscape strategy of new planting to increase habitat linkages. With the Proposed Development representing a very small change, there would be no change to the character of NCA 113 and the effects are predicted to be neutral and not significant.

Likely Visual Effects

- 7.16

As demonstrated by the visual appraisal, the Proposed Development would not be visible from the surrounding landscape due to the density of intervening vegetation (in both winter and summer conditions) and the enclosure to the Site by existing buildings within Gad’s Hill School.
- 7.17

From within the school grounds, the change to the façade and roof would result in minor beneficial effects. This is due to providing a more recessive façade and in combination with the green roof, tonal colours which visually link with the surrounding vegetated character of the Site.
- 7.18

From Gad’s Hill Place, the following extract of the Heritage Statement visualisations illustrate the change to the composition of the view, from a very notable red roof, to the green tones of the green roof and new visual links between the Site and the wider countryside.



Image 7-1: Extract of the Heritage Statement visualisations from Gad’s Hill Place, illustrating the existing view (left) and the Proposed Development (right).

- 7.19

The impact is assessed as moderate, which in relation to the high sensitivity of the view would result in a minor beneficial visual effect in winter and a moderate beneficial effect in summer conditions.

Landscape and Visual Effects Summary of the Proposed Development

- 7.20

From the above, the following table summarises the predicted landscape and visual effects from the Proposed Development.

Table 7-2: Landscape and Visual Effects Summary of the Proposed Development.

Landscape / Visual Receptor	Winter	Summer
The Site	Moderate beneficial	Moderate beneficial
NCA 113	Neutral	Neutral
LCA Shorne	Neutral	Neutral
LCA 4: Shorne Woodlands	Neutral	Neutral

Landscape / Visual Receptor	Winter	Summer
School users	Minor beneficial	Minor beneficial
School users and visitors to Gad’s Hill Place	Minor beneficial	Moderate beneficial

- 7.21

Whilst the Gravesham Landscape Sensitivity and Capacity Study suggests the Site is within a part of the landscape with a low capacity for single storey buildings due to the likely significant adverse landscape and visual effects, the above assessments demonstrate that there is actually a high capacity for the Proposed Development.
- 7.22

This is because the high quality architectural changes to the Hewlett Pavillion would increase the architectural and scenic value of the building, with the green roof providing increased opportunities for biodiversity. The resulting neutral effects to the published landscape character areas, moderate beneficial effects at the Site scale and minor to moderate beneficial visual effects demonstrate that the effects would not be significant adverse, as suggested by the Gravesham Landscape Sensitivity and Capacity Study.

8.0 GREEN BELT REVIEW

8.1 As demonstrated by **Figure L01: Site Context Plan**, the Site is within the Green Belt, which extends across all of the study area, except for Higham and Three Crutches. The following section summarises policies relevant to Green Belt matters in respect of the LVA.

National Planning Policy Framework (NPPF), 2024

8.2 NPPF paragraph 142 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence.

8.3 NPPF paragraph 143 states the Green Belt purposes as:

- i) “to check the unrestricted sprawl of large built-up areas;
- ii) to prevent neighbouring towns merging into one another;
- iii) to assist in safeguarding the countryside from encroachment;
- iv) to preserve the setting and special character of historic towns; and
- v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

8.4 NPPF paragraph 151 sets out that once Green Belt boundaries have been defined, Local Planning Authorities (LPA) should plan positively to enhance their beneficial use, which includes opportunities to provide access; outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity.

8.5 NPPF Paragraph 153 sets out that LPA’s should ensure that substantial weight is given to any harm to the Green Belt, including harm to the openness.

8.6 NPPF Paragraph 154 sets out that development in the Green Belt is inappropriate unless:

“c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt;

h iv) the re-use of buildings provided that the buildings are of permanent and substantial construction.”

8.7 NPPF Paragraph 155 dets out that other development in the Green Belt should not be regarded as inappropriate were all the following apply:

- “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;
- There is a demonstrable unmet need for the type of development proposed;
- The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.”

Planning Practice Guidance Green Belt (2025)²²

8.8 The guidance is aimed at reviews of Green Belt land and the identification of Grey Belt land. Openness is defines as being:

“capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume.”

8.9 The following table sets out the stated contribution of land to the relevant Green Belt purposes to aid in the assessment of whether land is Grey Belt or not.

Table 8-1: PPG Green Belt Contribution

NPPF Purpose	Contribution	Illustrative Features
A – Check the unrestricted sprawl of large built up areas	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.
B – Prevent neighbouring towns merging into one another	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.

²² Ministry of Housing, Communities and Local Government, Green Belt, <https://www.gov.uk/guidance/green-belt>

NPPF Purpose	Contribution	Illustrative Features
	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.
D - to preserve the setting and special character of historic towns	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.

Gravesham Local Plan Core Strategy

8.10 The Core Strategy sets out that 78% of the Borough is within the Green Belt and that the eastern Green Belt boundary is important due to forming a gap between Gravesend and the Medway Towns. Paragraph 4.2.8 of the Core Strategy states:

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

Regulation 18 Consultation Gravesham Green Belt Study April 2018²³

8.11 The Green Belt study provides an assessment of the Green Belt in order to aid in informing the options for accommodating growth. The study includes the Site in Parcel 10: South of Shorne, which as per the following extract of the published mapping extends from the A226 to the M2.

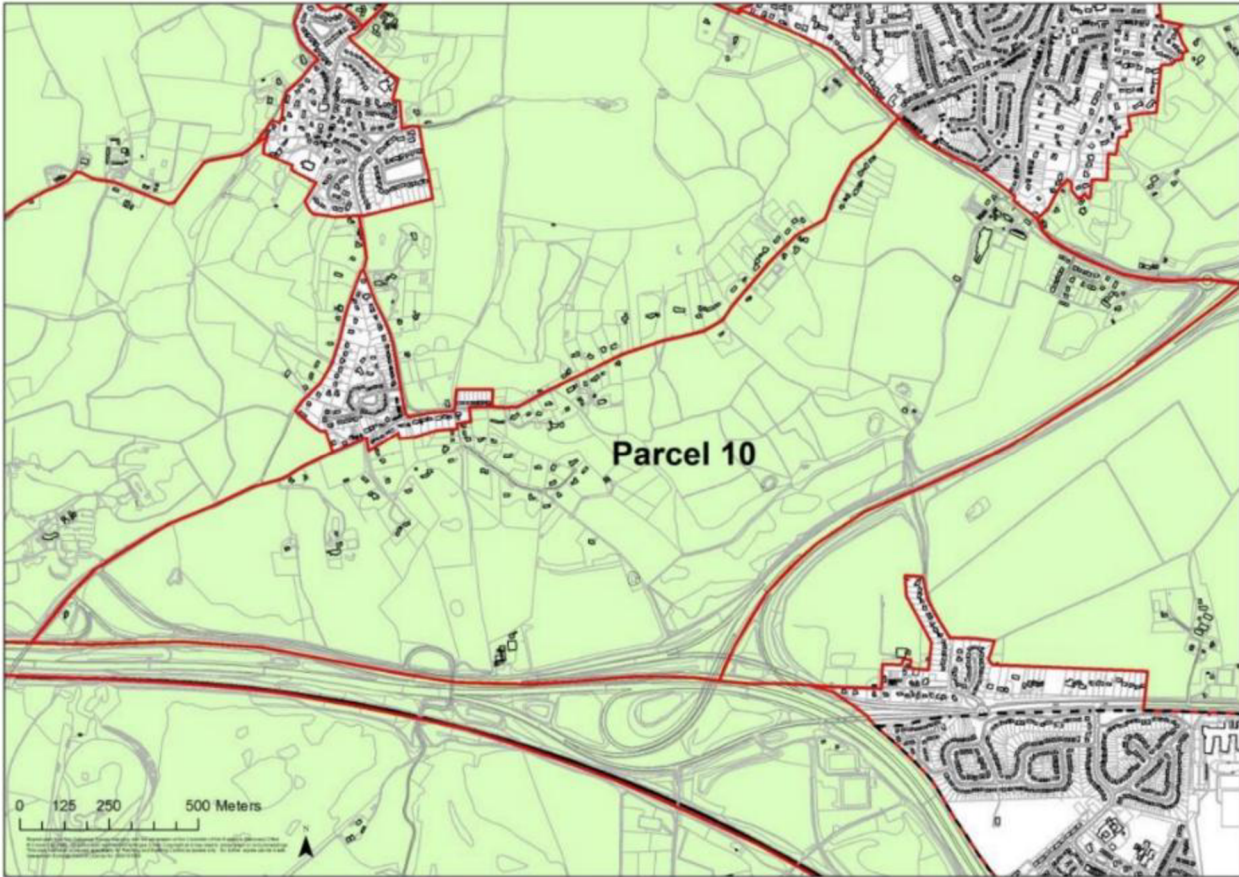


Image 8-1: Extract of the published study, with the Site at the northern edge of Parcel 10

8.12 The published study notes that Parcel 10:

“comprises a mix of uses. It contains several woods including Brewers Wood and Great Crabbles Wood. It includes some areas of arable land, particularly in the eastern and southern parts of the parcel. It also has pockets of residential development along Gravesend Road around Gad’s Hill School and Copperfield Crescent/Charles Dickens Avenue. There are dwellings in large grounds along much of Pear Tree Lane and also along Bowesden Lane and Pondfield Lane.”

8.13 The following table summarises the published studies assessment of Parcel 10 in relation to the first 3 NPPF Green Belt purposes and their respective methodology.

²³ Gravesham Borough Council, Green Belt Study Appraisal
<https://localplan.gravesham.gov.uk/connect.ti/sareg18/consultationHome#:~:text=Gravesham%20Green%20Belt>

%20Study%20This%20document%20provides%20the,Green%20Belt%20boundaries%20and%20site%20allocatio
ns%2C%20if%20required.

Table 8-2: Summary of the Published Studies Conclusions on the Contribution of Parcel 10

NPPF Green Belt Purpose	Published Study Conclusion
1. To check the unrestricted sprawl of large built-up areas.	Minimal / No Contribution
2. To prevent neighbouring towns merging into one another.	Significant Contribution
2A. To prevent other settlements in the Green Belt from merging.	Contribution
3. To assist in safeguarding the countryside from encroachment.	Contribution

- 8.14 In respect of NPPF purpose 2, the justification for the ‘significant contribution’ is due to the Parcel 10 forming a narrow tract of land between adjoining towns and the cumulative role with adjacent parcels in preventing merging and a break in built development. This is a broad analysis for the parcel as a whole and is generic to all land within this part of the borough.
- 8.15 In respect of NPPF purpose 2A, the justification for the ‘contribution’ is due to retaining separation between Shorne Ridgeway and Higham, with a specific focus on Pear Tree Lane as the separation between the two settlements. The Site is not part of this specific spatial analysis, being located to the south-east of Higham and therefore this is broad analysis for the parcel as a whole, rather than the specifics of the Site.
- 8.16 In respect of NPPF purpose 3, the justification for the ‘contribution’ is due to the largely wooded and arable character of the area and its visibility from the A2 and A289, due to its sloping landform. In respect of the Site, whilst there is a high degree of vegetation cover, the Site is an existing developed part of Parcel 10 and is not visible to the same extent as the wider rural landscape across the Parcel due to the density of the Site’s boundary vegetation. Therefore, this is a broad analysis for the parcel as a whole and is more pertinent to the rural landscape within Parcel 10, rather than the Site.

EDLA Green Belt Assessment of the Site

- 8.17 An assessment of the Site is undertaken in relation to the NPPF Green Belt purposes and then secondly as to whether the Site is Grey Belt or not.

Assessment in Relation to the NPPF Green Belt Purposes

- 8.18 The following table sets out an assessment of the Site based upon the Gravesham Green Belt methodology. The assessment does not include NPPG Green Belt purpose 1, as the above published study concluded that Parcel 10 made a minimal to no contribution to this purpose.

Table 8-3: EDLA Green Belt Assessment of the Site in Relation to NPPF Purposes 2 and 3

NPPF Green Belt Purpose	Site Assessment	Site Contribution
2. To prevent neighbouring towns merging into one another.	The stated methodology for assessing this Green Belt purpose is whether an area prevents the merging of Gravesend and Strood. It is the intervening features of ancient woodland and the A229 which prevent the merging of these settlement rather than the Site, which is already a developed part of the Green Belt. Therefore the Site's contribution is none.	None
2A. To prevent other settlements in the Green Belt from merging.	The stated methodology for assessing this Green Belt purpose is whether an area prevents the merging of Higham and Shorne Ridgeway. As the Site is bound by trees and other land uses within Gad’s Hill School, and that there is ancient woodland and extensive ribbon development adjacent to Pear Tree Lane between the Site and Shorne Ridgeway, the Site is considered not to function as part of the prevention of the merging of Higham and Shorne Ridgeway. It is the rural land between Crutches Lane and ribbon development adjacent to Pear Tree Lane which forms this function, not the existing developed character of the Site.	None
3. To assist in safeguarding the countryside from encroachment.	The stated methodology for assessing this Green Belt purpose is based upon the consideration of the following factors: The strength of existing boundaries: as set out in the above appraisal, the Site is bordered by established vegetation and land uses within Gad’s Hill School, such that it is physically and visually well enclosed in relation to the wider landscape. Land use: The Site is a developed part of the Green Belt due to its existing buildings. Topography: As set out in the baseline review, the Site is situated across engineered landform at the upper parts of Gad’s Hill, such that it does not reflect the more notable rising landform across the wider Green Belt. Landscape Character: The published landscape character assessments note the limited visibility of Gad’s Hill School and its containment. The visual appraisal demonstrates that the Site is not visible from the surrounding landscape. The Site is therefore considered not to be representative of the wider rural character.	None

- 8.19 From the above table, the Site makes no contribution to the Green Belt purposes as opposed to the ‘significant contribution’ of the wider Parcel 10, for which the Site is a very small part.

Assessment in Relation to the Grey Belt

- 8.20 The PPG Grey Belt Assessment is firstly based upon Purposes A, B and D.
- 8.21 In respect of Purpose A, the Gravesham Green Belt Study concludes the Site is in Area 10, which makes a minimal to no contribution to this purpose. The Site is not adjacent to, nor near a large built up area and is enclosed by other buildings within Gad’s Hill School. Therefore, in relation to the PPG criteria, the Site’s contribution to NPPF Purpose A is none.
- 8.22 In respect of Purpose B, the Site does not form part of the gap between town; makes no contribution to the visual separation due to not being visible from the wider landscape and is already a developed area. The Site’s contribution to NPPF Purpose B is none.

- 8.23

In respect of Purpose D, the Site is not free of existing development and is not in proximity to a historic town. Therefore, the Site’s contribution to NPPF Purpose D is none.
- 8.24

With reference to NPPF paragraph 155 and the remaining NPPF Green Belt purposes C and E; the Site would not undermine these due to making no contribution to assisting the countryside from encroachment; nor would it undermine urban regeneration and the recycling of derelict and other urban land.
- 8.25

From the above conclusions, the Site is assessed as Grey Belt.
- Likely Effects to the Green Belt
- 8.26

The existing building results in a reduction in spatial openness due to being a building. This was noted in the Appeal for the permanent retention of the existing buildings, with the Inspector noting in paragraph 10, that the effect of the existing buildings on the openness would be limited.
- 8.27

With the Proposed Development refurbishing the existing buildings at the Site, the Site would remain a developed area, with the same inherent reduction in spatial openness due to the presence of built form. The spatial openness of the roofscape however would be improved, via the change from a tiled roof to a green roof and less built form than the tiles. The green roof would also enhance the landscape character and opportunities for biodiversity.
- 8.28

The visual openness of the Site would be improved by the natural timber façade and the change from the tiled roof to the green roof.
- 8.29

Therefore, there any harm to the spatial and visual aspects of openness and the purposes of the Green Belt from the Proposed Development would be less than that of the ‘limited’ harm caused by the existing buildings.
- 8.30

In relation to the NPPF Green Belt purposes and NPPF Paragraph 154, the Proposed Development would respond positively to limb g), via the redevelopment of previously developed land, as it would not cause substantial harm to the openness of the Green Belt due to the beneficial changes to spatial and visual openness.
- 8.31

Notwithstanding the above, given the Site is assessed as Grey Belt, the Proposed Development would not be inappropriate in any event.

9.0 SUMMARY AND CONCLUSION

Baseline

- 9.1

With reference to **Figure L01: Site Context Plan**, the Site (‘red line boundary’) is a broadly rectangular area of land, covering existing buildings within the grounds of Gad’s Hill School. The Site is in close proximity to Gad’s Hill Place, the former home of Charles Dickens, an internationally renowned author. **Figure L01: Site Context Plan** also demonstrates that the Site is within the Green Belt, which although not a landscape designation, does have spatial and visual matters associated with the concept of ‘openness’.
- 9.2

With reference to **Figure L02: Topography Plan**, the Site is situated around 72 metres (m) Above Ordnance Datum (AOD), across the upper parts of Gad’s Hill. The Site is part of the northern aspect of a localised valley system, with the landform falling to the east and south of the Site, across Gad’s Hill, with the southern side of the valley, across Old Watling Street and Three Crutches, 1km to the south of the Site.
- 9.3

With reference to **Figure L01: Site Context Plan**, the settlement pattern is mainly concentrated to either the upper parts of the valley or the valley floor, such that the valley sides are mainly characterised by agricultural land uses. The main areas of woodland within the study area are to the west of the Site, extending between the A226 and the A289 via Court Wood and Great Crabbles Wood; both of which are ancient woodlands. The Site is not covered by any statutory or local landscape designations. The Kent Downs National Landscape is 1.3km to the south-west of the Site, extending around Shore Ridgeway and to the south of the M2. There are no Conservation Area in proximity to the Site.
- 9.4

The Gravesham Landscape Character Assessment includes the Site within LCA 4: Shorne Woodland; however as a predominantly wooded and rural area, the Site is not representative of the stated key characteristics. Relevant guidance for the management of future change includes new native planting to increase habitat linkages. The Site is also within area HI3: Higham South-east of the Gravesham Landscape Sensitivity and Capacity Study, which suggests there is a low capacity for new development like single storey educational facilities, due to the potential significant adverse landscape and visual effects.
- 9.5

With reference to **Figure L04: Viewpoint Plan**, the visual appraisal has identified that Site is not visible from the wider landscape. The Site is only visible from within the school grounds and Gad’s Hill Place, specifically the former bedroom of Charles Dickens. Within these views, the existing buildings are of a low scenic quality, due to the pronounced red tiled roof of the Hewlett Pavilion.

The Proposed Development	
9.6	The relevant features of the Proposed Development for the LVA are the replacement of the roof panels with a new green roof and the replacement of the black cladding on the Hewlett Pavilion with natural timber boards.
9.7	The benefits of green roofs are set out by a number of organisations, including the Landscape Institute and the Royal Horticultural Society, due to: • Biodiversity – the range of plants attract pollinators and support ecological food networks; • Cooling – plants absorb heat and cool the air via respiration, with roof temperatures noted as being between 15-10 degrees cooler than conventional roofs; • Pollution – plants on green roofs (like all plants) filter the air to reduce pollution; and • Flooding – green roofs slow and absorb rainfall, reducing pressure on surface water drainage systems, particularly in urban areas.
Likely Landscape and Visual Effects	
Landscape Effects	
9.8	The Proposed Development would result in a beneficial change to the architectural quality and scenic quality of the Hewlett Pavilion. This is because the natural timber boards will provide a more recessive tone which is more sympathetic to the vegetated setting of the building, and the varying oxidisation of the timber will provide a visual interest.
9.9	The monotonous style and notable red tone of the existing roof would be replaced with the soft form of the green roof, with a range of colour tones to reflect the surrounding vegetation. The green roof would respond positively to the Gravesham Design Code, which notes that green roofs promote biodiversity and improve the resilience to climate change.
9.10	The Proposed Development would also respond positively to the all of the published landscape character assessment's, due to increasing planting within the Site and the opportunists to increase habitat linkages.
9.11	The landscape effects of the Proposed Development are therefore predicted to range between neutral and moderate beneficial.
Visual Effects	
9.12	From within the school grounds, the change to the façade and roof would result in minor beneficial effects. This is due to providing a more recessive façade and in combination with the green roof, tonal colours which visually link with the surrounding vegetated character of the Site.
9.13	From Gad's Hill Place, the change to the composition of the view, from a very notable red roof, to the green tones of the green roof and new visual links between the Site and the wider countryside would result in minor beneficial effects in winter and moderate beneficial effects in summer.
Green Belt	
9.14	Gravesham's Regulation 18 Consultation Green Belt Study locates the Site within Parcel 10 and concludes that Parcel 10 makes both a ' <i>significant contribution</i> ' to the Green Blet purpose of preventing neighbouring towns from merging, along with a 'contribution' to assisting in safeguarding the countryside from encroachment.
9.15	However, this is both a broad analysis, generic to all land within this part of the borough. Additionally, the Site is an existing developed part of Parcel 10 and is not visible from the wider rural landscape across Parcel 10 due to the density of the boundary vegetation at the school. Therefore, the published conclusions are more pertinent to the rural landscape within Parcel 10, rather than the Site.
9.16	EDLA's assessment of the Site, based upon Gravesham's Green Belt methodology, concludes that the Site does not contribute to the NPPF Green Belt purposes and is Grey Belt, due to its very small geographic scale and existing developed character.
9.17	With the Proposed Development refurbishing the existing buildings at the Site, the Site would remain a developed area. The spatial and visual openness of the roofscape would be improved, via the change from a tiled roof to a green roof and less built form via the tiles. Therefore, there would be no harm to the spatial and visual aspects of openness and the purposes of the Green Belt, with the green roof providing the opportunity to enhance landscapes, visual amenity and biodiversity within the Green Belt, in accordance with NPPF paragraph 151.
Conclusion	
9.18	Whilst the Gravesham Landscape Sensitivity and Capacity Study suggests the Site is within a part of the landscape with a low capacity for single storey buildings due to the likely significant adverse landscape and visual effects, the LVA demonstrate that there is actually a high capacity for the Proposed Development.
9.19	This is because the high quality architectural changes to the Hewlett Pavillion would increase the architectural and scenic value of the building, with the green roof providing increased opportunities for biodiversity. The resulting neutral effects to the published landscape character areas, moderate beneficial effects at the Site scale and minor to moderate beneficial visual effects demonstrate that the effects would not be significant adverse, but would be beneficial, including in views from Gad's Hill Place.

- 9.20 Notwithstanding the Site is assessed as Grey Belt, in relation to NPPF Paragraph 154, the Proposed Development would respond positively to limb g), via the redevelopment of previously developed land, as it would not cause substantial harm to the openness of the Green Belt.
- 9.21 The Proposed Development is able to successfully accommodated within the existing landscape and visual context and provides the opportunities for a range of beneficial landscape and visual effects, including to the openness of the Green Belt.

10.0 APPENDIX I: LVA METHODOLOGY

- 10.1 The Landscape and Visual Appraisal methodology follows the best practice principles for assessing landscape and visual effects recommended by the Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (GLVIA 3). Reference is also made to the Landscape Institute’s Technical Guidance Note 02/21: Assessing landscape value outside national designations, 2021 (TGN 02/12).
- 10.2 LVAs are undertaken by professionals who are also typically involved in the design of the landscape and the preparation of landscape strategies and management proposals. This can allow the assessment to proceed as an integral part of the overall scheme design. Judgements are based on training and experience, and supported by evidence and reasoned argument.
- 10.3 In accordance with the GLVIA 3, the following distinct but related assessments are undertaken within an LVA:
- Assessment of landscape effects – assessing effects of the Development on the landscape as a resource (i.e. changes to physical elements/features of the landscape and/or the aesthetic, perceptual and experiential characteristics that make different landscapes distinctive); and
 - Assessment of visual effects – assessing effects of the Development on the views available to people and their visual amenity (i.e. changes in the context and character of views as a result of the change or loss of existing elements of the landscape and/or the introduction of new elements).
- 10.4 A LVA typically involves the following key steps:
- Baseline studies – establishing the existing landscape and visual conditions within the Site and the wider study area against which the effects of the Development are assessed.
 - Mitigation by Design – identifying measures to avoid/prevent, reduce or offset/remedy adverse potential landscape and visual effects.
 - Assessment of effects – systematically assessing the potential landscape and visual effects of the Development, including whether they are adverse or beneficial.

STUDY AREA

- 10.5 The LVA study area extends up to 1.5 kilometre (km) from the Site. Whilst the Proposed Development may be perceived beyond this distance, it is assessed that beyond the 1.5km study area there would be no important landscape or visual effects. This is due to the combination of distance, landform, vegetation and the existing perception of existing settlements and infrastructure. The 1.5km study area is therefore considered proportionate for the assessment of landscape and visual effects.

ASSESSMENT OF LANDSCAPE EFFECTS

Landscape Receptors

- 10.6 The character within the Site and the wider study area are recorded to provide a baseline against which the effects of the Development can be assessed. The assessment adopts the broad and inclusive European Landscape Convention (ELC) definition of landscape character embracing both rural and urban landscapes.
- 10.7 The character of the landscape is recorded by reference to relevant published landscape character assessments, desk-top analysis and field surveys.
- 10.8 Landscape receptors are defined aspects of the landscape resource that have the potential to be affected by a proposal. Landscape receptors may include:
- National and local landscape designations (e.g. National Landscapes , Areas of High Landscape Value and Areas of Attractive Landscape);
 - Landscape character areas as identified within published guidance; and
 - Landscape features that contribute to landscape character.
- 10.9 The **sensitivity** of the landscape receptor is a combination of its **value** and **susceptibility** described below:

Landscape Value

- 10.10 Landscape value is defined by TGN 02/12 as “*the relative value attached to different landscapes by society on account of their landscape qualities.*” This definition is compatible with GLVIA 3 and Natural England’s definition of landscape value.
- 10.11 The range of TGN 02/12 factors and their stated definitions that can be considered when identifying landscape value are:
- National heritage – a landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape;
 - Cultural heritage - landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape;
 - Landscape condition - landscape which is in a good physical state both with regard to individual elements and overall landscape structure;
 - Associations - landscape which is connected with notable people, events and the arts;
 - Distinctiveness – landscape that has a strong sense of identity;
 - Recreational – landscape offering recreational opportunities where experience of landscape is important;

- Perceptual (scenic) – landscape that appeals to the sense, primarily visual senses;
- Perceptual (wildness and tranquillity) – landscape with a strong perceptual value notably, wildness, tranquillity and/or dark skies; and
- Functional – landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape.

10.12 The following table sets out the value criteria for the assessment.

Table 10-1: Landscape Value Assessment Criteria

Value	Definition
High	A landscape with a strong national and/or cultural heritage, which is in good condition and contributes notably to the landscape via its overall landscape structure. A landscape of many and/or strong association, distinctiveness and recreational value. A landscape of high perceptual and functional value.
Medium	A landscape with some national and/or cultural heritage, which is in varying condition and makes some contributes to the landscape via its overall landscape structure. A landscape of some association, distinctiveness and recreational value. A landscape with some perceptual and functional value.
Low	A landscape of limited national and/or cultural heritage, which is in poor condition and makes a limited contribution to the landscape via its overall landscape structure. A landscape of limited association, distinctiveness and recreational value. A landscape which lacks perceptual and functional value.

Landscape Susceptibility

10.13 GLVIA 3 paragraph 5.41 sets out that susceptibility is “*the ability of a landscape receptor to accommodate the Development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies.*”

10.14 The criteria for assessing landscape susceptibility is based on a three point scale as set out in the following table.

Table 10-2: Landscape Susceptibility Assessment Criteria

Susceptibility	Definition
High	A landscape that has a very limited ability to accommodate the changes that would result from the type of development proposed without adversely changing its essential character / overall integrity.
Moderate	A landscape that has the ability to accommodate some degree of the changes that would result from the type of development proposed without adversely changing its essential character / overall integrity.
Low	A landscape that is robust or tolerant to accommodating the changes that would result from the type of development proposed, which would have limited effects on its essential character / overall integrity.

10.15 Criteria that may be taken into consideration in the assessment of landscape susceptibility include landform, pattern / complexity, composition, landcover and the relationship of a given landscape area to existing settlements or developments.

Landscape Sensitivity

10.16 Assessing the sensitivity of landscape receptors combines judgements of the value attached to the landscape with its susceptibility to the type of change or development proposed, as set out above.

10.17 The criteria for assessing landscape sensitivity is based on a three point scale, as set out in the following table.

Table 10-3: Landscape Sensitivity Assessment Criteria

Sensitivity	Definition
High	Typically a landscape that is of high value and high susceptibility. For example, a landscape of good condition with strong national or cultural heritage, and perceptual and functional factors such that there is a very limited ability to accommodate change without adversely changing its essential character / overall integrity.
Medium	Typically a landscape that is of medium value and moderate susceptibility. For example, a landscape of varying condition with some national or cultural heritage and some perceptual and functional factors such that there is some ability to accommodate change without adversely changing its essential character / overall integrity.
Low	Typically a landscape of low value and low susceptibility. For example, a landscape of poor condition with limited national or cultural heritage, with limited perceptual and functional factors such that there is a high ability to accommodate change without adversely changing its essential character / overall integrity.

ASSESSMENT OF EFFECTS

Assessing the Magnitude of Landscape Effects

10.18 The magnitude of a landscape effect is defined as the degree of change to landscape features or characteristics that will result from the introduction of the Development. The key factors which may influence the magnitude are:

- The extent of the Development;
- The relationship and distance of the Development to adjoining landscapes and the wider landscape context;
- The degree to which landscape character features will be changed by the Development;
- Whether effects are short (less than 5 years), medium (5-10 years) or long term more than 10 years) and
- Whether effects are permanent or temporary.

10.19 The criteria for assessing the landscape magnitude is based on a five point scale as set out in the following table.

Table 10-4: Magnitude of Landscape Effects Assessment Criteria

Magnitude	Definition
High	Typically, the Development would result in the extensive loss/alteration of key landscape characteristics and features. The change to the landscape character may be permanent or reversible.

Magnitude	Definition
Moderate	Typically, the Development would result in some loss/alteration of key landscape characteristics and features. The change to the landscape character may be permanent or reversible.
Low	Typically, the Development would result in a slight loss/alteration of key landscape characteristics and features. The change to the landscape character may be permanent or reversible.
Negligible	Typically, the Development would result in only very minor loss/alteration of key landscape characteristics and features. The change to the landscape character may be permanent or reversible.
None	The Development would not change the landscape characteristics or features.

Assessing Landscape Effects

10.20 The following table sets out a matrix as a guide to the combination of sensitivity and magnitude, in order to establish the effect. Where professional judgement considers that the effects differ from this guide, then a reasoned explanation is provided in the assessment narrative. Similarly, where the guide allows for a choice, e.g. major or moderate, the justification is provided in the assessment narrative.

Table 10-5: Landscape Effects

		Sensitivity		
	Criteria	High	Medium	Low
Magnitude	High	Major	Major or Moderate	Moderate or Minor
	Moderate	Major or Moderate	Moderate or Minor	Moderate or Minor
	Low	Moderate or Minor	Moderate or Minor	Minor
	Negligible	Minor or Negligible	Minor or Negligible	Negligible
	None	Neutral	Neutral	Neutral

10.21 The criteria for assessing landscape effects are based on a seven point scale as set out in the following table.

Table 10-6: Landscape Effects Assessment Criteria

Effect	Definition
Major Adverse	Typically, the Development would result in considerable deterioration of the quality and integrity of the landscape. For example by: - Introducing major changes that are at considerable variance with the scale, pattern and perceptual qualities of the area; or - Substantially diminishing the condition of the landscape through the extensive loss of valued features. Mitigation measures are very unlikely to fully remedy the effects and there would be adverse residual impacts.
Moderate Adverse	Typically, the Development would result in a partial deterioration of the quality and integrity of the landscape: - Introducing moderate changes that may be at odds with the scale, pattern and perceptual qualities of the area; or - Diminishing the condition of the landscape through the partial loss of valued features. Mitigation measures may remedy some but not all of the effects and there may still be some adverse residual impacts.

Effect	Definition
Minor Adverse	Typically, the Development would result in a slight deterioration of the quality and integrity of the landscape: - Introducing minor changes that are unlikely to be at odds with the scale, pattern and perceptual qualities of the area; or - Slightly diminishing the condition of the landscape through the limited loss of valued features.
Negligible Adverse	Typically, the Development would result in a very slight deterioration of the quality and integrity of the landscape: - Introducing negligible changes that are unlikely to be at odds with the scale, pattern and perceptual qualities of the area; or - Very Slightly diminishing the condition of the landscape through the limited loss of valued features.
Neutral	The Development would result in no discernible change to the character and quality of the landscape.
Negligible Beneficial	Typically, the Development would result in a very slight improvement to the landscape resource by enhancing the condition of some existing valued landscape features.
Minor Beneficial	Typically, the Development would result in a slight improvement to the landscape resource by enhancing the condition of some existing valued landscape features.
Moderate Beneficial	Typically, the Development would result in a partial improvement to the quality and integrity of the landscape. For example, by: - enhancing the condition of or restoring some existing valued landscape features, and - introducing new features that make a modest contribution to strengthening landscape character.
Major Beneficial	The Development would result in a considerable improvement to the quality and integrity of the landscape. For example, by: - substantially enhancing the condition of or restoring some existing valued landscape features, and - introducing new features that make a substantial contribution to strengthening landscape character.

ASSESSMENT OF VISUAL EFFECTS

Visual Analysis and Viewpoint Mapping

- 10.22 The potential visibility of the Site is established through desk top studies, through a review of existing landform, vegetation and settlement patterns.
- 10.23 Taking into account the visibility mapping and the location of visual/landscape receptors within the study area, a range of representative viewpoint locations from which views of the Site may be possible are selected. These include short distance views (largely related to receptors within the Site’s immediate zone of visual influence) and long distance views (related to receptors within the wider study area).

Zone of Theoretical Visibility

- 10.24 The ZTV has been generated using OS Terrain 5 as per the information stated on the drawing.

Value of the View

10.25 The criteria for assessing the value of views is based on a three point scale as set out in the following table.

Table 10-7: Value of Views Assessment Criteria

Value	Definition
High	View from a location that is likely to be of national importance, where the view forms part of the experience, and is likely to be experienced by a high number of people. Locations could include nationally designated landscapes / tourist destinations of national/regional importance / historic parks/gardens with designed vistas and views / National Trails and other promoted trails of regional importance.
Medium	View from a location that is likely to be of local importance, either designated or with cultural associations, where the view obtained forms part of the experience, and is likely to be experienced frequently by high numbers of people. Locations could include local public rights of way with evidence of regular use / public open spaces / residential areas / local transport routes.
Low	View from a location that is not designated, with minimal or no cultural associations, where the view is unlikely to be frequently experienced by a number of receptors. Locations could include recreational routes/areas, residential areas or transport routes.

Susceptibility of Visual Receptors

10.26 The susceptibility of visual receptors to changes in their views and general visual amenity typically depends on the activity or expectations of people experiencing the view, and the extent to which their attention is likely to be focused on the view.

10.27 The criteria for assessing the susceptibility of visual receptors to change is based on a three point scale as set out in the following table.

Table 10-8: Susceptibility of Receptors Assessment Criteria

Susceptibility	Definition
High	Receptors with high susceptibility to changes in views that would result from the Development where the primary enjoyment/amenity value comes from the contribution that views of the surroundings make, such as: - Residents at home; - People engaged in informal outdoor recreation activities directly related to the visual setting (e.g. users of country parks, promoted trails/ public rights of way and historic parks and gardens); - Visitors to public scenic viewpoints.
Moderate	Receptors with moderate susceptibility to changes in views that would result from the Development, such as: - Visitors to tourist attractions or cultural landmarks where views of the surroundings contribute to the experience; - Cyclists or recreational users, or scenic route where views of the surroundings contribute to the experience.
Low	Receptors with limited susceptibility to changes in views that would result from the Development where views of the surroundings form an incidental contribution to the experience of the activity being undertaken, such as:

Susceptibility	Definition
	- Areas of formal outdoor recreation activities (e.g. football, rugby, children’s play areas); - Main road and rail users; - People at their place of work whose attention is focused on their work and the visual setting is not considered to contribute to the quality of working life.

Sensitivity of Visual Receptors

10.28 Assessing the visual sensitivity of receptors combines judgements of the value attached to the view with the susceptibility of the receptor to the type of change or development proposed.

10.29 The criteria for assessing visual sensitivity is based on a three point scale as set out in the following table.

Table 10-9: Visual Sensitivity of Receptors Assessment Criteria

Sensitivity	Definition
High	Typically, a view of high value experienced by receptors of high susceptibility to relatively small changes in the view.
Medium	Typically, a view of medium value experienced by receptors of moderate susceptibility to some degree of changes in the view.
Low	Typically, a view of low value experienced by receptors of low susceptibility to more substantial changes in the view.

ASSESSMENT OF EFFECTS

Assessing the Magnitude of Visual Effects

10.30 The magnitude of a visual effect is defined as the degree of change in a view that will result from the introduction of the Development. The key factors which may influence the magnitude are:

- the distance between the Development and the receptors;
- the prominence of the Development in views;
- the extent of the Development visible and the extent of the view being occupied by the Development;
- the backdrop and foreground within the view;
- whether effects are short, medium or long term; and
- whether effects are permanent or temporary.

10.31 The criteria for assessing the magnitude of landscape effects is based on a five point scale as set out in the following table.

Table 10-10: Magnitude of Visual Effects Assessment Criteria

Magnitude	Definition
High	Typically, the Development would appear as a very visually dominant feature and have a large-scale effect on the view, resulting in a pronounced / complete change / contrast to the existing view. The change may be permanent and long-term.
Moderate	Typically, the Development would appear as a visually prominent feature and have a medium-scale effect on the view, resulting in a noticeable change / contrast in the view. The change may be permanent or temporary/short-term.
Low	Typically, the Development would appear as only a minor and not visually prominent component, resulting in an unobtrusive change / small-scale contrast in the view. The change may be permanent or temporary/short-term.
Negligible	The Development would result in a barely perceptible change in the view. There would be no fundamental change to the viewing experience. The change may be permanent or temporary/short-term.
None	The Development would not be visible.

Assessing the Visual Effects

10.32 The following table sets out a matrix as a guide to the combination of sensitivity and magnitude, in order to establish the effect. Where professional judgement considers that the effects differ from this guide, then a reasoned explanation is provided in the assessment narrative. Similarly, where the guide allows for a choice, e.g. major or moderate, the justification is provided in the assessment narrative.

Table 10-11: Visual Effects

		Sensitivity		
	Criteria	High	Medium	Low
Magnitude	High	Major or Moderate	Major or Moderate	Moderate or Minor
	Moderate	Major or Moderate	Moderate or Minor	Moderate or Minor
	Low	Moderate or Minor	Moderate or Minor	Minor or Negligible
	Negligible	Minor, Negligible or Neutral	Minor, Negligible or Neutral	Negligible or Neutral
	None	Neutral	Neutral	Neutral

10.33 The criteria for assessing the visual effects is based on a seven point scale as set out in Table 7.12 below.

Table 10-12: Visual Effects Assessment Criteria

Effect	Definition
Major Adverse	Typically, changes to a view resulting from the Development that would result in pronounced deterioration to the view. Mitigation measures are highly unlikely to remedy all the effects and there may be adverse residual impacts.
Moderate Adverse	Typically, changes to a view resulting from the Development that would result in a partial deterioration to the view Mitigation measures may be likely to remedy the effects although there may be some adverse residual impacts.
Minor Adverse	Typically, changes to a view resulting from the Development that would result in a slight deterioration to the view.
Negligible Adverse	Typically, changes to a view resulting from the Development that would result in a very slight deterioration to the view.
Neutral	No perceptible changes to a view from the Development that would result in either adverse or beneficial visual effects for any receptors.

Effect	Definition
Negligible Beneficial	Typically, small scale improvements to a view resulting from the Development that would result in very slight benefits to the view
Minor Beneficial	Typically, small scale improvements to a view resulting from the Development that would result in slight benefits to the view.
Moderate Beneficial	Typically, medium scale improvements to a view resulting from the Development that would result in partial improvements to the view.
Major Beneficial	Typically, large scale improvements to a view resulting from the Development that would result in substantial improvements to the view as experienced.

11.0 APPENDIX II: PUBLISHED LANDSCAPE CHARACTER EXTRACTS

4. Shorne Woodlands



Landscape Description



Shorne Woodlands is located to the south east of Gravesend. The combined corridor of the Channel Tunnel Rail Link and the A2 form the southern boundary, with the A289 forming the boundary to the east.

The geology of the area is varied, with Thanet Beds underlying Shorne and much of the perimeter of the area. A band of Woolwich Beds follows the contours on slightly higher ground. Shorne Ridgeway is underlain with Blackheath and Oldhaven Beds, and London Clay underlies the highest point west of Shorne Ridgeway within Randall Wood. Soils are loam throughout the character area.

The topography is undulating, with high points around Shorne Ridgeway and within Randall Wood. Land falls away towards the east of the character area, with the A289 running within a dip. Views out of the character area are varied because of the undulating landform and significant areas of woodland. From Gravesend Road along the northern boundary of the area there are views out to the marshes and the River Thames, whilst from the centre of the area views are more limited. Tree cover is dominant, with native coppice providing a strong sense of enclosure throughout much of the area.

Woodland is extensive to the west of Shorne, with Brummerhill, Shorne, Randall and Brewers Woodlands. Some open arable fields surround Court Wood and Great Crabbles Wood to the east. Shorne Wood Country Park lies to the south west, with a recent sustainable building surrounded by extensive car parks and well managed coppice woodland. Within settlements, more recent ornamental garden planting provides a gardenesque character.

Settlement is concentrated within Shorne and Shorne Ridgeway. Building style and age is varied, with older vernacular style properties within the village centres and more recent 1960's -1970's development and some Victorian terraces further towards the village edges. Traditional building materials include flint, chequered brickwork and Kent peg tiles. There is also a strong use of ornamental brickwork along boundary walls and adjacent to gateway entrances. Village greens form a strong characteristic,

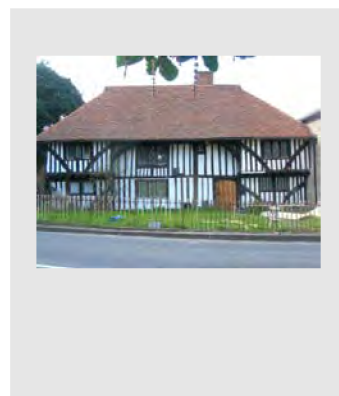
Key Characteristics

- Undulating topography
- Chestnut coppice woodland
- Strong sense of enclosure
- Traditional village greens
- Varied building style and age
- Chequered brickwork and ornamental brickwork
- Few highways with busier roads along character area boundaries



with traditional features including unique signs and traditional red telephone boxes.

There are few highways, with busier roads along the character area boundaries and less major roads running through Shorne and linking Higham with the A2. A small network of public footpaths is concentrated to the north of Randall Wood, as well as there being some public footpaths running through open arable land to the east of Shorne and around the perimeter of Great Crabbles Wood.



Condition: Good



The pattern of elements is coherent, with the extent of coppice woodland providing a unifying feature throughout the area. Overhead wires are visible in part and there is a small amount of fly tipping. The high proportion of woodland provides a strong ecological framework. Woodland management, and therefore condition, is stronger around Shorne Wood Country Park than woodland to the east. Some 20th century development does not respect the local vernacular although buildings within the village centres exert a definitive sense of place and provide traditional cultural integrity.

Sensitivity: Moderate

The area is very much characterised by the extent of coppice woodland, which therefore contributes significantly towards local distinctiveness. The traditional village centres and properties within Shorne and Shorne Ridgeway are distinct and also promote a strong sense of place, although some hedgerows, field boundaries and highways are less distinct. The combination of landform and tree cover provides an enclosed character and subsequent low visibility within the character area. However there are extensive views out of the area from vantage points at the woodland edge, particularly to the north across the marshland to the Thames.



The sensitivity of the landscape is assessed as being moderate.

Guidelines: Conserve and Reinforce

Guidelines for Shorne Woodlands aim to conserve areas in good condition and reinforce the distinctive features and elements of the landscape.

- Conserve and reinforce wooded character by continued coppice management.
- Conserve and reinforce ecological interest of the woodland.

- Manage access arrangements to balance the need for recreation whilst controlling unauthorised access and anti-social uses, and respecting ecological sensitivity.
- Encourage local native species within the woodland.
- Encourage the use of traditional fencing materials and native hedges on field boundaries to create woodland links within arable fields.
- Conserve traditional features in village centres e.g. red phone boxes, street furniture, village signs and post boxes, and reinforce character through the use of vernacular materials and elements.

Condition

good	REINFORCE	CONSERVE & REINFORCE	CONSERVE
moderate	CREATE & REINFORCE	CONSERVE & CREATE	CONSERVE & RESTORE
poor	CREATE	RESTORE & CREATE	RESTORE
	low	moderate	high

Sensitivity

- Control highway approaches into villages to reinforce the character of historic settlements.

Purposes of the Green Belt

17. The National Planning Policy Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. It sets out the five purposes served by the Green Belt – see Figure 3 below. The Core Strategy also sets out a number of local purposes of the Green Belt. These relate to some of the national purposes and are included in Figure 3 below.

Figure 3: National and Local Purposes of the Green Belt

National Purpose	Related Local Purpose
to check the unrestricted sprawl of large built-up areas	to maintain the break in development between the eastern edge of Gravesend and the Medway Towns which is one of the few barriers preventing the further eastward sprawl of London and the merging of towns along the southern part of the Thames Estuary
to prevent neighbouring towns merging into one another	
to assist in safeguarding the countryside from encroachment	to assist in safeguarding the countryside from encroachment by minimising the expansion of the Borough's rural settlements
to preserve the setting and special character of historic towns	No specific related local purpose
to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	to assist in concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet

Assessments of the Parcels

18. The assessment methodology has been developed following extensive research of Green Belt assessments produced by other local planning authorities. It takes into account the requirements of the National Planning Policy Framework, planning practice guidance and best practice. We have consulted the neighbouring local planning authorities on the methodology and amended it accordingly.

19. For each parcel, the following information is provided:

- (i) Map
 - (ii) Description
 - (iii) Assessment against each relevant national and local Green Belt purpose using a traffic light system of: **Significant Contribution**, **Contribution** or **Minimal/No Contribution**
 - (iv) Summary
- Further information is given on points (ii)-(iv) below.

Description

20. The description sets out:

- Location of the parcel

- Description of what the parcel contains
- Topography and visibility of the parcel

Purpose 1: Check the unrestricted sprawl of large built-up areas

21. This analyses what contribution the parcel plays in preventing the sprawl of the large built-up areas of Gravesend, Northfleet or Strood. Where the parcel directly abuts these towns, consideration is given to the amount and nature of development within the adjoining part of the parcel. Reference is made to the strength of the boundary between the parcel and the built-up area. Main roads and railways are considered to be strong boundaries. Smaller residential and country roads are considered to be weak but distinct boundaries. Curtilages are weak boundaries. In cases where there is minimal development in the parts of parcels which abut urban areas, these are assessed as having a significant contribution. All parcels which do not abut the large built-up areas of Gravesend, Northfleet or Strood are assessed as having minimal/no contribution.

Purpose 2: Prevent neighbouring towns merging

22. This assesses what contribution the parcel plays in preventing the merging of Gravesend and Strood. When considered in the context of the Metropolitan Green Belt as a whole, the gap between the towns of Gravesend and Strood is very narrow, i.e. it is only 4km at the nearest point. The analysis makes reference to the presence of main roads and railways which link the towns and the gaps between the settlements. The effects will always be an in-combination effect with other parcels. Parcels which lie directly between Gravesend and Strood are assessed as having a significant contribution. All other parcels are assessed as having minimal/no contribution.

Purpose 2a: Prevents other settlements in the Green Belt from merging

23. This is an additional purpose which has been added to the assessment to consider the contribution each parcel plays in preventing settlements inset from the Green Belt from merging with each other. It considers the effect of development on both sides of the roads where the roads form the boundary of the parcel. It also highlights if one part of the parcel is more important in terms of preventing merging. Where the majority of the parcel separates two or three settlements inset from the Green Belt, it is assessed as having a significant contribution. In cases where part of the parcel separates two or three settlements inset from the Green Belt, it will be assessed as having a contribution. All other parcels will be assessed as having minimal/no contribution.

Purpose 3: Safeguarding the countryside from encroachment

24. In assessing the extent to which a parcel safeguards the countryside from encroachment, consideration will be given to:

- the strength of the existing boundaries
- land use
- topography and landscape character

25. The strength of the boundaries is assessed on the same basis as set out in paragraph 15 above.

26. In relation to land use, the assessment sets out how much of the parcel comprises open uses acceptable in the Green Belt (agriculture, forestry, outdoor sport, outdoor recreation, cemeteries). It also indicates how much built development/urbanising features are present in the parcel. These include buildings, pylons, electricity lines,

roads, railways and car parking. It refers to where recent encroachments have occurred, e.g. GP surgeries, affordable housing, leisure and community centres, new/widened roads, new railways. Where there is built development close to the urban area and settlements inset from the Green Belt, it refers to the comparative character of this, e.g. sporadic, spaced out development as opposed to more dense, built up character. The nature of the topography, landscape character and size of the parcel is also considered.

27. Where the parcel has been affected by only small scale development since its inclusion within the Green Belt, it is assessed as having a significant contribution to safeguarding the countryside from encroachment. Where its boundaries have been influenced by major rail or road building or significant amounts of the parcel have been subject to new development, it will be assessed as having a contribution to this Green Belt purpose. Where most of the parcel has been affected by major rail or road building, the parcel will be assessed as having minimal/no contribution.

Purpose 4: Preserve the setting and special character of historic towns

28. Gravesend and Northfleet comprise the towns within the Borough and both have historic cores which are reflected by a number of conservation area designations. The Green Belt boundaries are located some distance from these conservation area boundaries, so it is considered that the Green Belt has no real role in preserving the setting and special character of Gravesend and Northfleet.

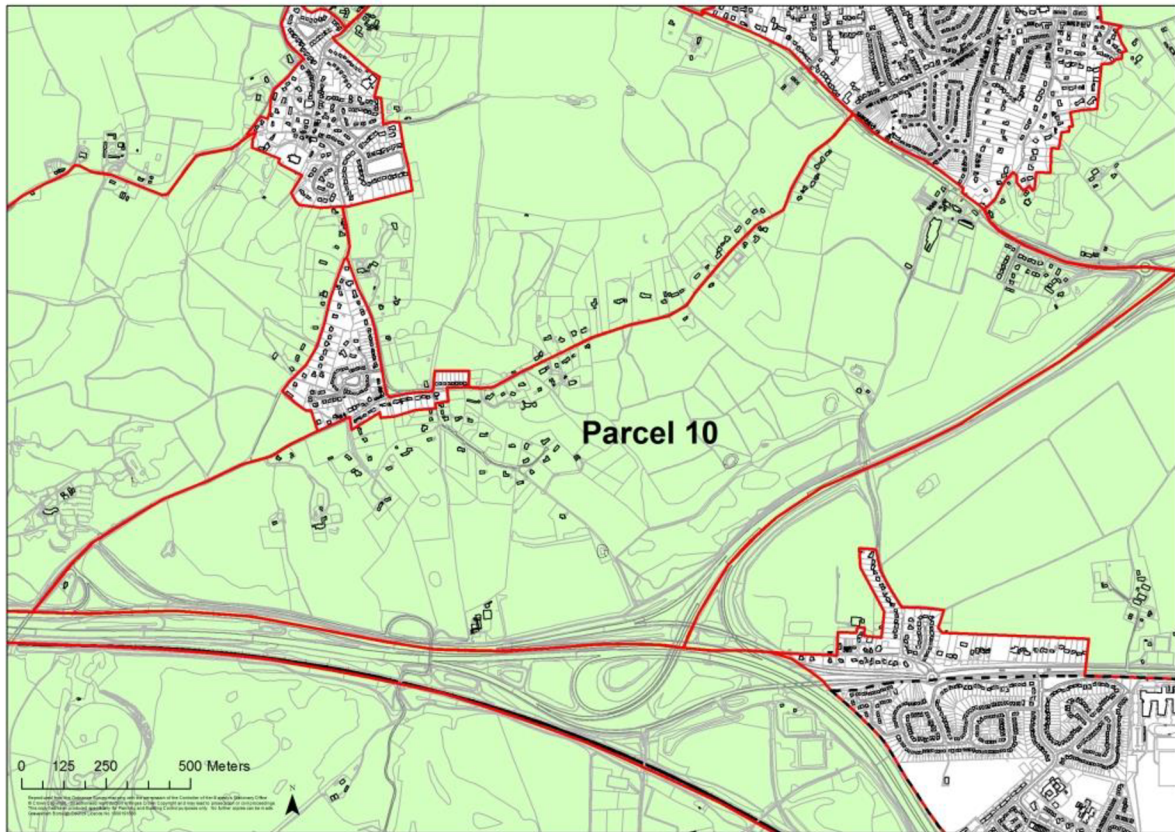
Purpose 5: Assist urban regeneration by encouraging the recycling of derelict and other urban land

29. The Strategic Housing and Economic Needs Assessment (2016) for Gravesham and Medway identified most of the Borough as being within the Dartford, Gravesham and Medway housing sub-market. It found that Dartford and Gravesend are closely tied to each other and also to London. On this basis, it is considered that the Green Belt parcels in Gravesham contribute equally towards assisting urban regeneration by encouraging the recycling of derelict and other urban land in the wider area. For these reasons, this purpose is not specifically assessed in this document.

Summary

30. The summary for each assessment includes a brief outline of the results for the parcel. This highlights if there are any particular areas which are important to prevent the merging of settlements and includes information about any encroachment which has occurred. It identifies whether there are any potential opportunities for development without adversely affecting the strategic purposes of the Green Belt. This recognises the fact that paragraphs 89 and 90 of the NPPF include lists of developments which are not inappropriate in the Green Belt. The summary also sets out whether there are alternative, stronger boundaries, both strategically and locally.

Parcel 10 South of Shorne



Description

The parcel lies between the A226 Gravesend Road to the north and the A2/M2 to the south. Part of the northern boundary abuts Higham which is a settlement inset from the Green Belt. The western boundary is formed by Brewers Road, part of The Ridgeway, the edge of built development forming the settlement of Shorne Ridgeway (which is also inset from the Green Belt) and Pear Tree Lane. The A289 Wainscott Bypass comprises the eastern boundary of the parcel.

The parcel comprises a mix of uses. It contains several woods including Brewers Wood and Great Crabbles Wood. It includes some areas of arable land, particularly in the eastern and southern parts of the parcel. It also has pockets of residential development along Gravesend Road around Gad's Hill School and Copperfield Crescent/Charles Dickens Avenue. There are dwellings in large grounds along much of Pear Tree Lane and also along Bowesden Lane and Pondfield Lane.

With the exception of its easternmost point, much of Pear Tree Lane runs along a ridge. The parcel slopes down from this towards the A289 which lies in a valley.

Purpose 1 – to check the unrestricted sprawl of large built up areas

The area does not directly abut either Gravesend or Strood so it does not contribute towards check the unrestricted sprawl of large built up areas.

Minimal/No Contribution

Purpose 2 – to prevent neighbouring towns merging

The parcel is situated between Gravesend and Strood, alongside main roads which link the two towns (A2, A226 and A289). Strood lies only a short distance to the south east of it. Shorne Ridgeway abuts the western boundary and Higham lies to the north. The gap between Shorne Ridgeway and Strood (this parcel and parcel 11) and between Higham and Strood (parcel 5, this parcel and parcel 11) is relatively narrow. The gaps to the west between Shorne Ridgeway and Shorne (parcels 8 and 9) then Shorne and Gravesend (parcel 6) are also narrow. As a result, 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.

Significant Contribution

Purpose 2a – to prevent other settlements in the Green Belt from merging

The parcel is located between Shorne Ridgeway and Higham, which are settlements inset from the Green Belt. Extensive ribbon residential development, in the form of large dwellings in large grounds, already exists along much of Pear Tree Lane which separates the two settlements. The presence of this development in the gap makes this part of the parcel important in preventing the merging of the Shorne Ridgeway and Higham. Overall, this parcel contributes towards preventing the merging of settlements inset from the Green Belt.

Contribution

Purpose 3 – to safeguard the countryside from encroachment

The northern, eastern and southern boundaries are very strong as they follow major roads. The western boundary largely follows a country lane so is distinct but weak. Part of this boundary around Shorne Ridgeway follows the curtilages of dwellings and a public house so this is weak.

Large parts of the parcel are covered by woodland and arable land, both of which are appropriate uses in the Green Belt. However, there are also significant numbers of residential properties set within large curtilages within the area. This creates sporadic and ribbon development along Pear Tree Lane, Bowesden Lane and Pondfield Lane which encroaches into the countryside. However, this development largely predates the Green Belt designation and is more spaced out than the development within the settlements. More recently, significant encroachment has occurred as a result of the construction of the A289 Wainscott Bypass, a dual carriageway which bisects the area between Higham and Strood. The A289 lies in a valley which separates this parcel and parcel 11.

Despite the presence of development, the parcel is still largely wooded and arable in character. It is visible from the A2 and A289 due to the fact that it slopes up from the roads. Whilst encroachment has occurred in this parcel, the character and topography ensure that it makes a contribution towards safeguarding the countryside from encroachment and preserving the openness of the Green Belt.

Contribution

Summary

The parcel makes a significant contribution towards preventing the merging of Gravesend and Strood. It also contributes towards preventing other settlements from merging and

safeguarding the countryside from encroachment but there has been some encroachment as a result of the construction of the A289.

There are no opportunities for development in this parcel, with the exception of that allowed under paragraphs 89 and 90 of the NPPF, without adversely affecting the strategic purposes of the Green Belt. There are also no opportunities for strengthening the strategic Green Belt boundaries. More locally, a stronger boundary could be formed by using The Ridgeway and Pear Tree Lane as the boundary to Shorne Ridgeway.

12.0 APPENDIX III: POLICY RELEVANT TO LVA

12.1 The following section sets out the policies relevant to the LVIA.

National Planning Policy Framework, 2024

12.2 Paragraph 8(c) states:

.” Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

12.3 Paragraph 96 states:

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

12.4 Paragraph 124 states:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

12.5 Paragraph 125 states:

“Planning policies and decisions should support development that makes efficient use of land, taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.”

12.6 Paragraph 129 states:

“Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.”

12.7 Paragraph 131 states:

“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. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

12.8 Paragraph 135 states:

“Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

12.9 Paragraph 136 states:

“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.”

12.10 Paragraph 137 states:

“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. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

12.11 Paragraph 139 states:

“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.”*

12.12 Paragraph 187 states:

- “Planning policies and decisions should contribute to and enhance the natural and local environment by:*
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
 - f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

Gravesham Core Strategy

12.13 Policy CS01: Sustainable Development states:

“Planning applications that accord with the policies in the development plan for Gravesham 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. It will work proactively with applicants jointly to find solutions which mean that

proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

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, taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- Specific policies in that Framework indicate that development should be restricted.”*

12.14 Policy CS02: Scale and Distribution of Development states:

“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 this plan. The extent of the Green Belt is defined on the Policies Map. A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt.”

12.15 Policy CS12: Green Infrastructure states:

“A multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. The network will improve access within the urban area, from the urban area to the rural area and along the River Thames. The key parts of the network are identified on Figure 19: Strategic Green Infrastructure Network.

Sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity.

There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create 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.

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

The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant.”

12.16 Policy CS13: Green Space, Sport and Recreation states:

“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.

A set of consistent green space, playing pitch and sports provision standards will be established which will apply to all new development. Provision should be made on-site. However, where this is not possible because of the site size, location or other specified circumstances, alternative provision or the enhancement of existing facilities will be required off-site. In all cases, provision will include arrangements for the ongoing maintenance of the space.”

12.17 Policy CS19: Development and Design Principles states:

“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 anticrime 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. This will be achieved through the criteria set out below:

Using the collaborative approach advocated in Building for Life and in line with the guidance set out in Kent Design, the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;

New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;

New development will be located, designed and constructed to:

- safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;*

- *avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and*
- *not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;*
- *The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;*
- *New development will be designed in an inclusive way to be accessible to all members of the community;*
- *New development will provide appropriate levels of private and public amenity space;*
- *New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;*
- *Car parking will be well related to the development it serves;*
- *New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;*
- *New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;*
- *The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;*
- *New development will incorporate appropriate facilities for the storage and recycling of waste; and*
- *The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism."*

Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. These include:

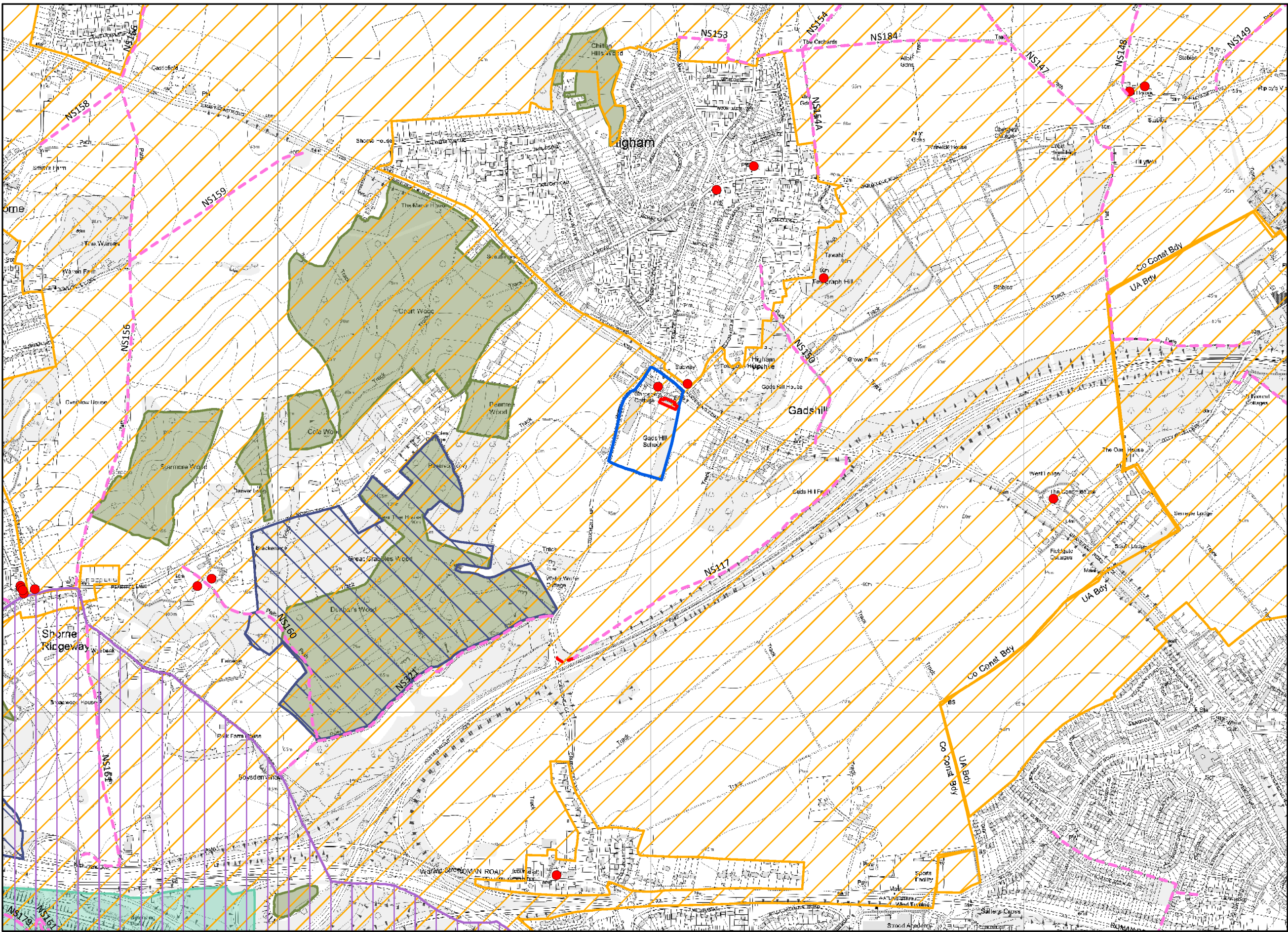
- *Gravesend Town Centre, its development as a heritage riverside town, and its setting;*
- *The Borough's urban and rural conservation areas; and*
- *Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.*

When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset."

12.18 Policy CS20 Heritage and the Historic Environment states:

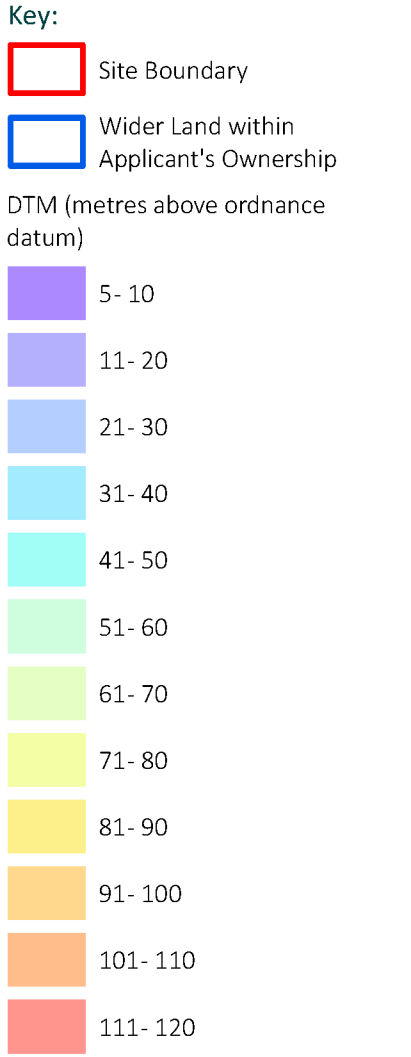
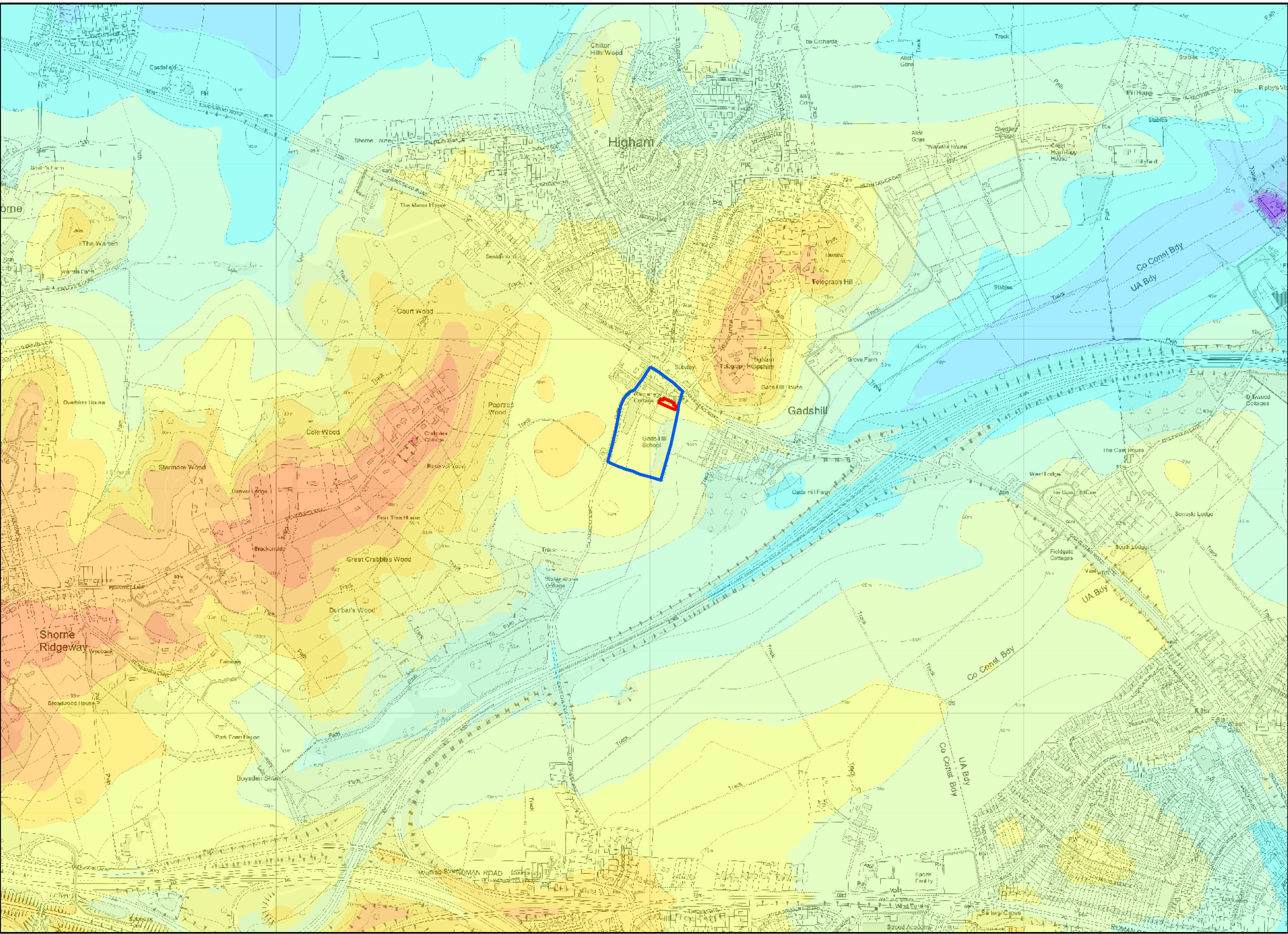
"The Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

13.0 APPENDIX IV: LVA PLANS AND PHOTOGRAPHS

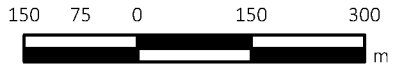


- Key:
- Site Boundary
 - Wider Land within Applicant's Ownership
 - Public Right of Way
 - Listed Buildings
 - Ancient Woodland
 - SSSI
 - Kent Downs National Landscape
 - Green Belt
 - Cobham Hall

GAD'S HILL SCHOOL, ROCHESTER
LANDSCAPE AND VISUAL APPRAISAL

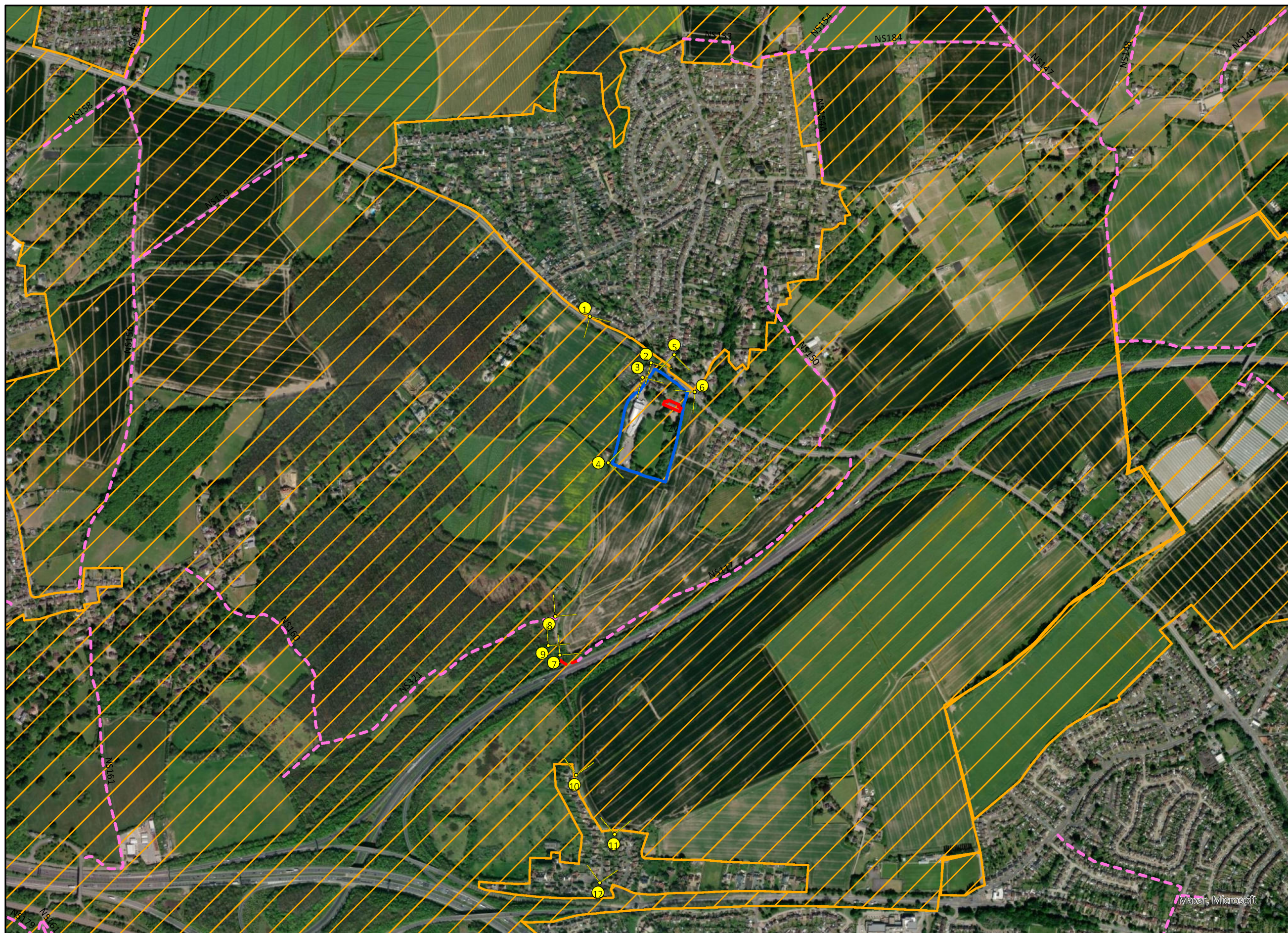


* The contour colouring is representative for visualization purposes only, taken from Defra Lidar DTM Elevation Data (2022) from the Defra website <https://environment.data.gov.uk/DefraDataDownload/?Mode=survey> (accessed at 20-08-2025)



GAD'S HILL SCHOOL, ROCHESTER
LANDSCAPE AND VISUAL APPRAISAL





Key:

- Site Boundary
- Wider Land within Applicant's Ownership
- Public Right of Way
- On-site route of existing PRoW
- Viewpoint Location
- Green Belt



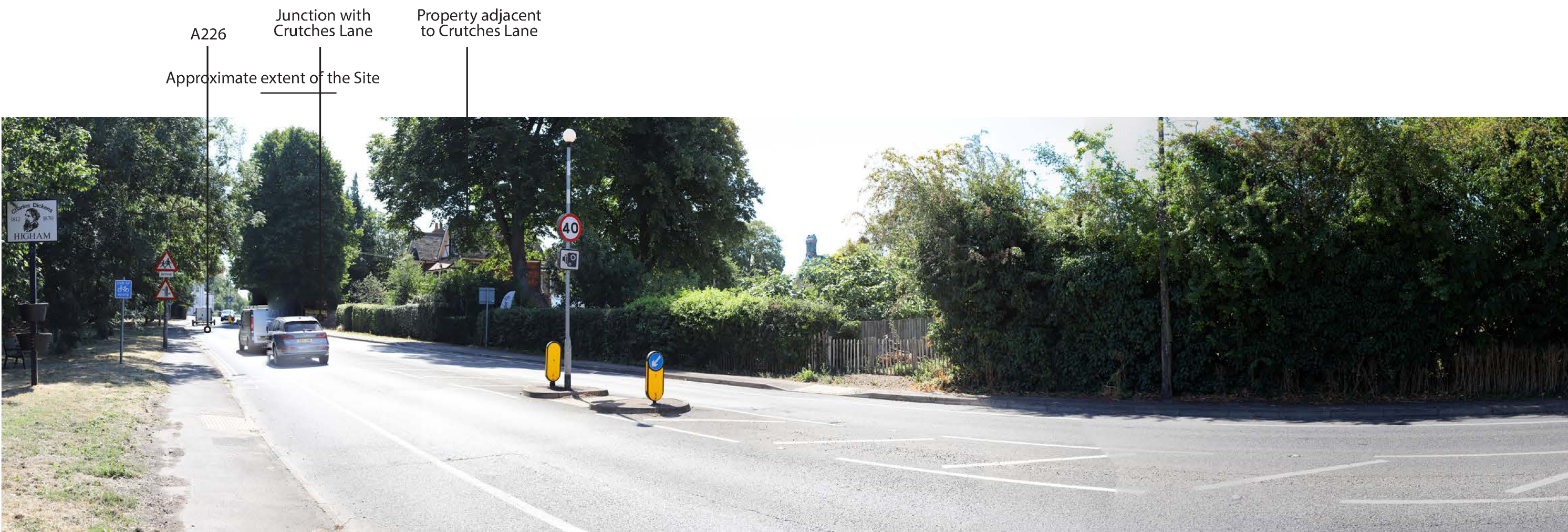
GAD'S HILL SCHOOL, ROCHESTER

LANDSCAPE AND VISUAL APPRAISAL

VIEWPOINT LOCATIONS PLAN

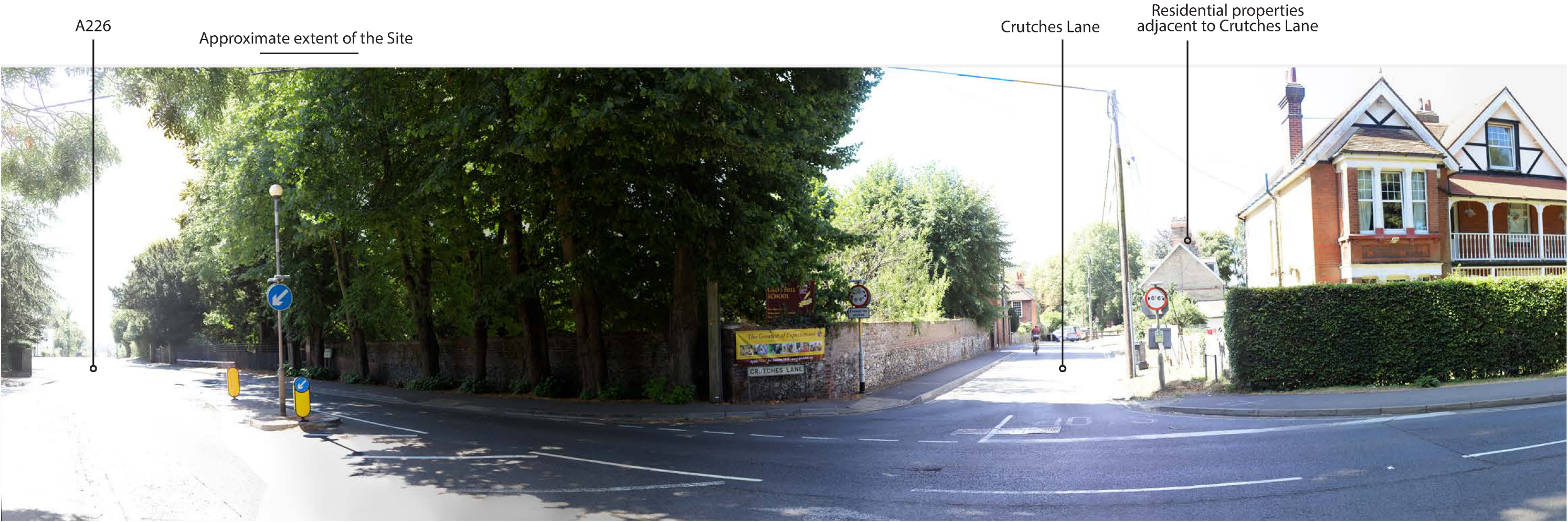
Drawing No	0465-L04
Status	Final
Date	20-08-2025
Scale	1:10,000@A3
Revision	-





VIEWPOINT 01	For context only	Description. View from the north side of the A226 (Gravesend Road), looking south-east.
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landscape architects edla	VIEWPOINT INFORMATION				PROJECT INFORMATION			
	Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Gad’s Hill School Rochester		Figure No. L04	
	Date & time of photograph. 10/08/2022 @ 11:21		Visualisation Type. Type 1		Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 1 of 24	
	Direction of View (Clockwise).	Xfrom North	Distance from site. 300m	Projection. Cylindrical	Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00



VIEWPOINT 02	For context only	Description. View from the A226 looking south-east
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landscape architects edla	VIEWPOINT INFORMATION			PROJECT INFORMATION			
	Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm	Project Title. Gad's Hill School Rochester		Figure No. L04	
	Date & time of photograph. 10/08/2022 @ 11:08		Visualisation Type. Type 1	Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 3 of 24	
	Direction of View (Clockwise). X° from North	Distance from site. 118m	Projection. Cylindrical	Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00



VIEWPOINT 03 For context only

Description. View from Crutches Lane looking south-east

landscape
architects

edla

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Gad's Hill School Rochester		Figure No. L04	
Date & time of photograph. 10/08/2022 @ 11:04		Visualisation Type. Type 1		Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 5 of 24	
Direction of View (Clockwise). X° from North	Distance from site. 75 m	Projection. Cylindrical		Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00



VIEWPOINT 04	For context only	Description. View from Crutches Lane looking east
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landscape architects edla	VIEWPOINT INFORMATION			PROJECT INFORMATION			
	Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm	Project Title. Gad's Hill School Rochester		Figure No. L04	
	Date & time of photograph. 10/08/2022 @ 12:02		Visualisation Type. Type 1	Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 7 of 24	
	Direction of View (Clockwise). 45° from North	Distance from site. 213m	Projection. Cylindrical	Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00

Approximate extent of the Site

Properties adjacent to Forge Lane



VIEWPOINT 05 For context only

Description. View from Forge Lane, looking south

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Gad’s Hill School Rochester		Figure No. L04	
Date & time of photograph. 10/08/2022 @ 11:24		Visualisation Type. Type 1		Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 9 of 24	
Direction of View (Clockwise). 45° from North	Distance from site. 123m	Projection. Cylindrical		Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00



VIEWPOINT 06 For context only

Description. View from the A226 looking south-west

landscape
architects

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VIEWPOINT INFORMATION

Camera make & model. Canon EOS 6D Mark II

Focal Length. 50mm

Date & time of photograph. 10/08/2022 @ 11:30

Visualisation Type. Type 1

Direction of View (Clockwise). 45° from North

Distance from site. 54 m

Projection. Cylindrical

PROJECT INFORMATION

Project Title. Gad's Hill School Rochester

Figure No. L04

Dwg Title. Site Context Photosheet

Project & Dwg No. 0465

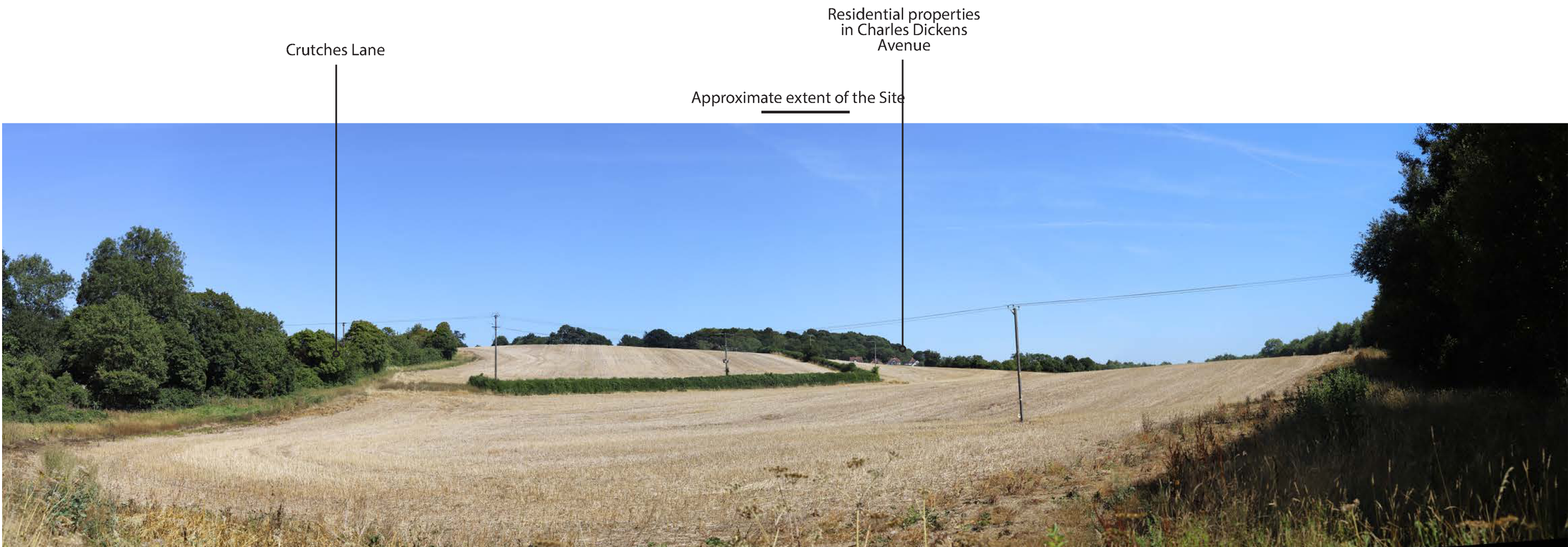
Sheet No. 11 of 24

Drawn by. JW

Approved by. RH

Date. 15/08/2022

Rev. 00



VIEWPOINT 07

For context only

Description. View from PRoW (footpath) 1023/NS117/1 looking north-east

landscape
architects

edla

VIEWPOINT INFORMATION

Camera make & model. Canon EOS 6D Mark II

Focal Length. 50mm

Date & time of photograph. 10/08/2022 @ 11:49

Visualisation Type. Type 1

Direction of View (Clockwise). 45° from North

Distance from site. 732m

Projection. Cylindrical

PROJECT INFORMATION

Project Title. Gad's Hill School Rochester

Figure No. L04

Dwg Title. Site Context Photosheet

Project & Dwg No. 0465

Sheet No. 13 of 24

Drawn by. JW

Approved by. RH

Date. 15/08/2022

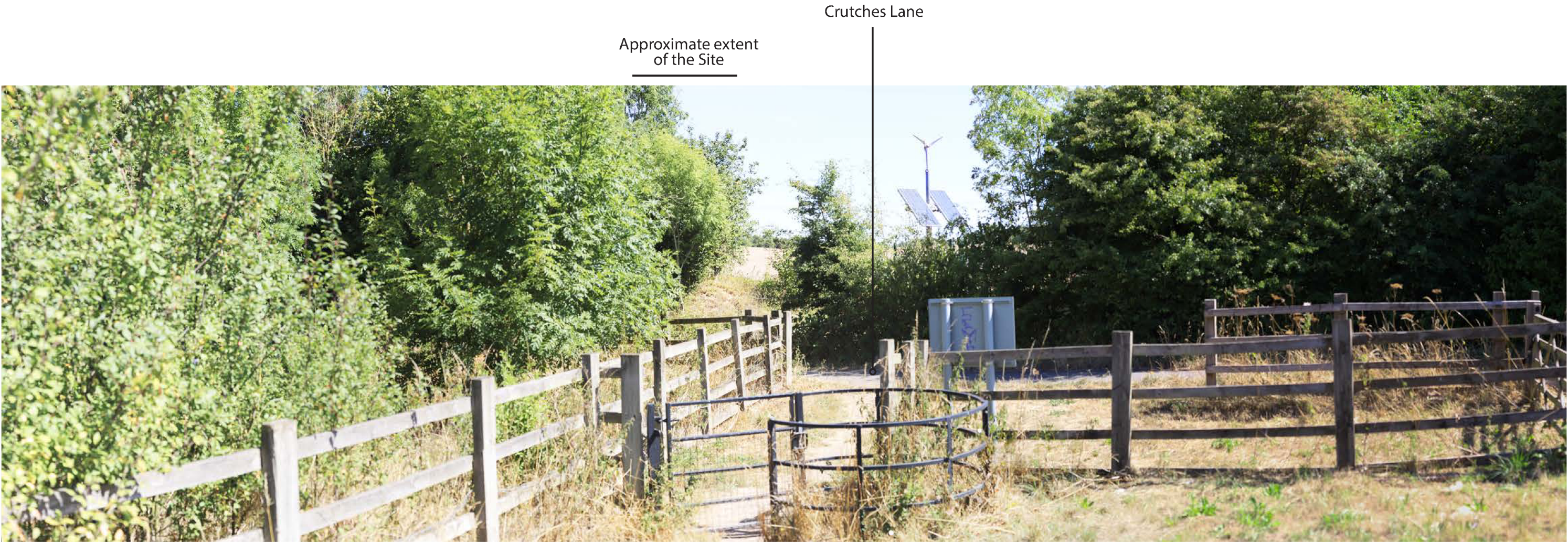
Rev. 00



VIEWPOINT 08 For context only

Description. View from PRow (footpath) 0229/NS321/2 looking north-east

landscape architects edla	VIEWPOINT INFORMATION			PROJECT INFORMATION			
	Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm	Project Title. Gad's Hill School Rochester		Figure No. L04	
	Date & time of photograph. 10/08/2022 @ 11:56		Visualisation Type. Type 1	Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 15 of 24	
	Direction of View (Clockwise). 45° from North	Distance from site. 639m	Projection. Cylindrical	Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00



VIEWPOINT 09	For context only	Description. View from Great Crabbles Wood park looking north-east
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landscape architects edla	VIEWPOINT INFORMATION			PROJECT INFORMATION			
	Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm	Project Title. Gad's Hill School Rochester		Figure No. L04	
	Date & time of photograph. 10/08/2022 @ 11:53		Visualisation Type. Type 1	Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 17 of 24	
	Direction of View (Clockwise). 45° from North	Distance from site. 766m	Projection. Cylindrical	Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00



VIEWPOINT 10	For context only	Description. View from Crutches Road looking north-east
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landscape architects edla	VIEWPOINT INFORMATION			PROJECT INFORMATION			
	Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm	Project Title. Gad's Hill School Rochester		Figure No. L04	
	Date & time of photograph. 10/08/2022 @ 12:11		Visualisation Type. Type 1	Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 19 of 24	
	Direction of View (Clockwise). 45° from North	Distance from site. 1km	Projection. Cylindrical	Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00



VIEWPOINT 11	For context only	Description. View from residential properties on Colewood Drive looking north-east
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landscape architects edla	VIEWPOINT INFORMATION			PROJECT INFORMATION			
	Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm	Project Title. Gad's Hill School Rochester		Figure No. L04	
	Date & time of photograph. 10/08/2022 @ 12:13		Visualisation Type. Type 1	Dwg Title. Site Context Photosheet	Project & Dwg No. 0465	Sheet No. 21 of 24	
	Direction of View (Clockwise). 45° from North	Distance from site.1.1km	Projection. Cylindrical	Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00



VIEWPOINT 12 For context only

Description. View from the junction of Crutches Lane and Old Watling Street looking north

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VIEWPOINT INFORMATION

Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm
Date & time of photograph. 10/08/2022 @ 12:15		Visualisation Type. Type 1
Direction of View (Clockwise). 45° from North	Distance from site. 1.2km	Projection. Cylindrical

PROJECT INFORMATION

Project Title. Gad's Hill School Rochester		Figure No. L04	
Dwg Title. Site Context Photosheet		Project & Dwg No. 0465	Sheet No. 23 of 24
Drawn by. JW	Approved by. RH	Date. 15/08/2022	Rev. 00