



## **Land at Blackthorn Farm, Culverstone Green**

**Landscape and Visual Impact Assessment & Green Belt Assessment**

On behalf of **Esquire Developments Limited**

## Document Control Sheet

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# 1 INTRODUCTION

## 1.1 Overview

1.1.1 Stantec was commissioned in January 2025 by Esquire Developments Limited (the 'Client') to undertake a Landscape and Visual Impact Assessment, including a Green Belt Assessment (the 'LVIA') with respect to the delivery of up to 100 homes and associated development, hereafter referred to as the 'Proposed Development', on the Land at Blackthorn Farm, Culverstone Green (the 'Site') within the administrative boundary of Gravesham Borough Council (GBC).

1.1.2 This LVIA has been prepared with regard to best practice guidance within the Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> Edition (GLVIA3) that states "*Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and amenity*" (Para 1.1).

1.1.3 GLVIA3 also states that when identifying landscape and visual effects there is a "*need for an approach that is in proportion to the scale of the project that is being assessed and the nature of the likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional*" (Para 1.17).

1.1.4 The LVIA has been undertaken to establish the landscape and visual sensitivity of the Site and to identify likely landscape and visual effects that may arise as a result of the Proposed Development. The objectives of this study include:

- To assess the landscape character and quality of the Site and its context and the function of the Site within the wider landscape, particularly in relation to existing landscape designations and policies;
- To assess the visibility of the Site and the nature and quality of existing views towards the Site;
- To identify opportunities and constraints to development on the Site, from a landscape and visual perspective in relation to the potential development of the land;
- To assess the likely effects upon landscape character and visual amenity that would arise as a result of the Proposed Development on the Site;
- To consider the policy basis for the underlying Green Belt designation which applies to the Study Area, as defined on Figure 1: Site Context Plan; and
- To assess the contribution of the Site in response to its Green Belt function.

1.1.5 The LVIA process has been used to inform the design of mitigation included and embedded within the Proposed Development with the aim of avoiding or reducing adverse landscape and visual effects. The principal elements of the LVIA include:

- Analysis of the physical context of the Site;
- Summary of key planning policy and evidence base relevant to the Proposed Development;
- Appraisal of the landscape features and character of the Site and its surroundings;
- Consideration of the visual qualities of the Site and the wider landscape; and
- Assessment of the effects on landscape character and visual amenity likely to result from the Proposed Development.

1.1.6 The LVIA should be read in combination with the following appendices, plans, and photographs:

- **Figure 1: Site Context Plan** - demonstrating the location of the Site in relation to areas of settlement, key areas of vegetation and landscape and cultural heritage designations within the Study Area;
- **Figure 2: Topography Plan** - demonstrating the topography of the Site to aid the understanding of the visual envelope of the Site and its aspect within the wider landscape setting;
- **Figure 3: Landscape Character Plan** - demonstrating the location and extent of character areas set out within published landscape character assessments;
- **Figure 4: Site Appraisal Plan** - demonstrating key landscape and built characteristics within the Site and the locations of the Site Appraisal Photographs (SAP);
- **Figure 5: Visual Appraisal Plan** - demonstrating the areas from which the Site is visible through a series of Site Context Photographs (SCP);
- **Figure 6: Landscape and Visual Opportunities and Constraints Plan** – illustrates key landscape and visual factors influencing Site design, including visual sensitivity, enclosure, access, and potential for green and blue infrastructure;
- **Figure 7: Illustrative Landscape Masterplan** – demonstrating the landscape and visual considerations informing the masterplan layout and the overall approach to the strategic green infrastructure in different parts of the Proposed Development, by way of secondary mitigation;
- **Site Appraisal Photographs A to G** - illustrating the character of the different areas of the Site and the landscape features within it; and
- **Site Context Photographs 1 to 10** - illustrating key views towards the Site from the surrounding landscape and the role that the Site plays in those views.

1.1.7 The methodology adopted for this LVIA, is provided in **Appendix A: Landscape and Visual Impact Assessment Methodology**. This has been informed by GLVIA3, published by the Landscape Institute and the Institute of Environmental Management and Assessment (IEMA). The extent of the study area generally aligns with that shown in **Figure 1: Site Context Plan**. The assessment also reflects guidance presented in:

- ‘An approach to Landscape Character Assessment’, prepared by Natural England; (October 2014);
- Technical Guidance Notes 02/21: ‘Assessing the Value of Landscapes Outside National Designations’ and 06/19: ‘Visual Representation of Development Proposals’, prepared by the Landscape Institute; and
- Planning Practice Guidance (PPG) published by the UK Government.

## 2 SITE CONTEXT

### 2.1 Landscape Setting, Location and Land Use

2.1.1 As demonstrated in **Figure 1: Site Context Plan**, the Site extends to approximately 5.4 hectares and is located to the north of the settlement edge of Culverstone Green, within the administrative boundary of Gravesham Borough Council. It comprises landscape of predominantly pastoral land, broadly divided into two irregularly shaped parcels by a central belt of woodland vegetation and post-and-rail fencing. The landform is gently undulating, contributing to a sense of enclosure and an inward-facing character, particularly within the western field.

2.1.2 The Site is visually well-contained by mature boundary vegetation, including tree belts and hedgerows, which limit views in and out of the Site. To the west and north, the Site is bordered by the A227 South Street and associated ribbon development extending along Chapmans Hill and Heron Hill Lane. This includes a mixture of residential and commercial properties such as Hope Cottages, located directly to the north, and Mitford House, situated near the Site's south-western corner. These built features introduce a degree of urbanising influence; however, their visibility is filtered or screened by intervening vegetation and built form.

2.1.3 At the centre of the Site lies Blackthorn Farm, a small cluster of single-storey buildings associated with agricultural and equestrian use. These include timber stables, corrugated metal sheds, and portable storage containers, loosely arranged around a central yard. The buildings are modest in scale and utilitarian in character, with several showing signs of weathering and limited maintenance. Ancillary items such as trailers, horseboxes, and equipment reinforce the Site's working appearance. Despite the presence of built form, mature vegetation and surrounding hedgerows soften views, ensuring integration with the wider landscape.

2.1.4 The eastern parcel of the Site is more visually secluded and tranquil in character. It is bounded by dense woodland and mature vegetation that restrict long-range views and create a strong sense of separation from the surrounding countryside.

2.1.5 The Site lies in close proximity to Culverstone Green, a settlement inset from the Green Belt. The Site is physically related to the built-up area of Culverstone Green and is perceived to already lie within the confines of this settlement due to the presence of built form aligned to Chapman's Hill and Heron Hill Lane to the north-west of the Site, alongside ribbon development extending northwards along the A227 corridor. The surrounding pattern of development includes residential dwellings of varying age and character, with early 20th-century housing nestled within the wooded slopes of the Culverstone valley, and post-war properties dating from the 1930s and 1960s occupying higher ground on the plateau adjacent to the A227. This layered settlement pattern reinforces the Site's transitional position between defined settlement and open countryside.

### 2.2 Access and Public Rights of Way (PRoW)

2.2.1 The key transport routes within the vicinity of the Site include:

- The A227 South Street, aligned broadly north-south to the west of the Site, which extends through the landscape and provides connectivity between Vigo and Meopham Green; and
- Heron Hill Lane aligned east-west to the north of the Site, which connects South Street with Harvel and Priestwood.

2.2.2 The Site is not crossed by any PRoW although there are a number of PRoW located within the vicinity of the Site. PRoW NS284 runs east-west just to the north of the Site along the course of Heron Hill Lane. A series of PRoW radiate out from, and through, the built-up area of Culverstone Green, following the ridgelines and valley bottoms of the underlying landform as well as providing connectivity to other nearby built-up areas including Hodsell Street and Harvel.

2.2.3 There are no areas of Countryside and Rights of Way (CRoW) Act Land within the vicinity of the Site, although the Culverstone Green Recreation Ground does lie approximately 600m to the south of the Site at its nearest point.

## 2.3 Topography and Hydrology

2.3.1 As demonstrated by **Figure 2: Topography Plan**, the Site comprises gently sloping land, which falls from approximately 166m Above Ordnance Datum (AOD) in the south, to approximately 143m in the north-eastern part of the Site. The settlement of Culverstone Green is situated on the gently sloping chalk plateau of the dip slope of the North Downs. Two dry valleys pass through the landscape to the west and east of the main body of the village, draining towards the Thames. In this regard, the Site forms part of a broadly north-facing spur of this plateau landscape.

2.3.2 There are no notable hydrological features within the vicinity of the Site or the settlement of Culverstone Green, with the exception of a small pond that lies to the immediate south of the Site.

## 2.4 Vegetation

2.4.1 With reference to **Figure 1: Site Context Plan** and **Figure 4: Site Appraisal Plan**, the Site is contained by substantial tree belts that form part of the northern, eastern, southern and western boundaries of the Site. Willow Wood, which defines the eastern boundary of the Site, is also defined as ancient woodland and provides a framework that provides one means of distinction between the 1930s and 1960s built development of Culverstone Green.

2.4.2 Within Culverstone Green itself, ornamental and structural planting is commonplace within its western part, with the streetscape generally featuring mature trees within the curtilage of residential dwellings and lining the roads. In contrast, the eastern part of Culverstone Green appears heavily sylvan in character, with the backdrop of all views being dominated by the enclosing woodland.

2.4.3 Beyond Culverstone Green, strips of woodland are commonplace within the valley areas, much of which is defined as ancient woodland. Field boundaries are typically defined by hedgerows featuring the occasional mature hedgerow tree and/or substantial tree belts.

## 2.5 Designations

2.5.1 The Site is not covered by any national, regional or local landscape designations. The nearest nationally designated landscape, the Kent Downs Area of Outstanding Natural Beauty (National Landscape) lies approximately 1.3km to the east of the Site at its nearest point.

2.5.2 There are no national or local nature reserves in the vicinity of the Site, although the Local Wildlife Site 'Happy Valley, Meopham' (GR10) does lie approximately 270m to the east of the Site at its nearest point.

2.5.3 There are no Registered Park and Gardens within the vicinity of the Site, while there are also few other designated heritage assets within the surrounding area. The nearest designated heritage assets are the Grade II listed Owls Castle and Owls Castle Barn, which lie approximately 185m to the south-west of the Site.

## 2.6 Green Belt

2.6.1 The Site and surrounding landscape lies within the Green Belt, with the exception of the main built-up area of Culverstone Green (which is inset from the Green Belt).

## 2.7 Summary

2.7.1 The Site comprises approximately 5.4 hectares of agricultural land, enclosed by mature hedgerows, tree belts, and post-and-rail fencing, with the built form of Blackthorn Farm located centrally. It is located on the edge of Culverstone Green, which is inset from the Green Belt. While the Site does not directly adjoin

the defined settlement boundary, it is patently perceived as part of the overall settlement footprint and pattern, in conjunction with the linear development along the A227 South Street and built form aligned to Chapman's Hill and Heron Hill Lane to the north-west of the Site.

- 2.7.2 Topographically, the Site forms part of a gently north-facing spur of the North Downs plateau, falling from approximately 166m AOD in the south to 143m AOD in the north-east. The Site is visually well-contained by mature boundary vegetation, most notably Willow Wood - defined as ancient woodland - along the eastern edge. There are no PRoW crossing the Site, and views from nearby routes, including PRoW NS284 to the north, are typically restricted or heavily filtered.
- 2.7.3 The Site is not subject to any landscape designations, although the Kent Downs AONB (National Landscape) lies approximately 1.3km to the east. The nearest ecological designation is the Happy Valley, Meopham Local Wildlife Site (GR10), located 270 metres east of the Site, while the closest designated heritage assets are the Grade II listed Owls Castle and Owls Castle Barn, approximately 185 metres to the south-west.

## 3 LANDSCAPE POLICY CONTEXT

### 3.1 Overview

3.1.1 The Site is located within the administrative boundary of Gravesham Borough Council (GBC).

3.1.2 The landscape policy context for the Site makes reference to the following adopted and emerging policy documents:

- National Planning Policy Framework, 2024<sup>1</sup>;
- Planning Practice Guidance (PPG)<sup>2</sup>;
- Gravesham Local Plan Core Strategy, adopted 2014<sup>3</sup>;
- Residential Layout Guidelines SPG2, adopted 1996, amended June 2020<sup>4</sup>;
- Design for Gravesham – Design Code SPD, May 2024<sup>5</sup>;
- SPD Kent Design Guide, 2005<sup>6</sup>;
- Gravesham Landscape Sensitivity and Capacity Study, 2016<sup>7</sup> (Part 1 Site Allocations: Issues and Options - Reg18 Consultation Documents);
- Draft Development Management Policies Document, October 2020<sup>8</sup> (Reg 18 Stage 2 Consultation: Part 2);
- Draft Strategic Housing Land Availability Assessment (SHLAA), 2020 Update<sup>9</sup> (Reg 18 Stage 2 Consultation);
- The Gravesham Stage 2 Green Belt Study<sup>10</sup> and Appendices<sup>11</sup>, August 2020 (Reg 18 Stage 2 Consultation)

### 3.2 National Planning Policy

#### National Planning Policy Framework, 2024

3.2.1 The NPPF promotes a presumption in favour of sustainable development, defined as “*meeting the needs of the present without compromising the ability of future generations to meet their own needs*”. Development proposals must be in accordance with the relevant up-to-date Local Plan and policies set out in the NPPF.

<sup>1</sup> [National Planning Policy Framework - GOV.UK](https://www.gov.uk/government/publications/national-planning-policy-framework)

<sup>2</sup> [Planning practice guidance - GOV.UK](https://www.gov.uk/government/publications/planning-practice-guidance)

<sup>3</sup> [Gravesham Local Plan Core Strategy - September 2014](https://www.gov.uk/government/publications/gravesham-local-plan-core-strategy)

<sup>4</sup> [residential-layout-guidelines-spq2-inc-housing-standards-policy-statement-2015](https://www.gov.uk/government/publications/residential-layout-guidelines-spq2-inc-housing-standards-policy-statement-2015)

<sup>5</sup> [design-for-gravesham-design-code-spd](https://www.gov.uk/government/publications/design-for-gravesham-design-code-spd)

<sup>6</sup> [Kent Design Guide - Kent County Council](https://www.kent.gov.uk/planning-and-building/planning-and-development/design-guides)

<sup>7</sup> <https://localplan.gravesham.gov.uk/Gravesham-Landscape-Sensitivity-and-Capacity-Study>

<sup>8</sup> <https://localplan.gravesham.gov.uk/Regulation-2018-Stage-2-Policies.pdf>

<sup>9</sup> [https://localplan.gravesham.gov.uk/Strategic\\_Land\\_Availability\\_Assessment\\_2020\\_Update](https://localplan.gravesham.gov.uk/Strategic_Land_Availability_Assessment_2020_Update)

<sup>10</sup> <https://localplan.gravesham.gov.uk/Green-Belt-Report>

<sup>11</sup> <https://localplan.gravesham.gov.uk/Green-Belt-Appendix>

3.2.2 The NPPF states that “*the purpose of the planning system is to contribute to the achievement of sustainable development*”, with **Paragraph 8** going on to state that to achieve this the planning system has three overarching objectives: economic, social and environmental.

3.2.3 The environmental objective is described as: “*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.*”

3.2.4 **Paragraph 125** of the NPPF states that planning policies and decisions should: “*encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside; [and] recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production...*”

3.2.5 **Paragraph 129** states that planning policies and decisions should support development that makes efficient use of land by taking account of:

- (d) *the desirability of maintaining an area's prevailing character and setting (including residential gardens) ...; and*
- (e) *the importance of securing well-designed, attractive and healthy places.”*

3.2.6 **Paragraphs 131-141** focus on achieving well-designed places and promote good design of the built environment. This approach is enshrined in **Paragraph 135**, which 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 users 51; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

3.2.7 **Paragraph 139** states that “*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 which use visual tools 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 which use visual tools 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.”*

3.2.8 **Chapter 13** addresses the Green Belt, with **Paragraph 142** stating “*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*”.

3.2.9 **Paragraph 143** subsequently sets out the following five purposes of the Green Belt:

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

3.2.10 The ‘grey belt’ is defined in the Annex 2 Glossary as “*land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development*”.

3.2.11 **Paragraph 149** addresses defining Green Belt boundaries, setting out that plans should:

- “a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

3.2.12 **Paragraph 155** sets out:

*“The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:*

- a) the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b) there is a demonstrable unmet need for the type of development proposed;
- c) the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- d) where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.

3.2.13 The 'Golden Rules' are thus set out in **Paragraph 156** as follows:

*"Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:*

- a) affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;
- b) necessary improvements to local or national infrastructure; and
- c) the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces."

3.2.14 **Paragraph 158** states "A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission", while **Paragraph 159** notes:

*"The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes."*

3.2.15 **Section 15** relates to the conservation and enhancement of the natural environment, with **Paragraph 187** setting out that planning policies and decisions should look to achieve this by "protecting and enhancing valued landscapes" and "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services".

### **Planning Practice Guidance (PPG)**

3.2.16 To support the policies of the NPPF, the Government has produced the live online Planning Practice Guidance (PPG) covering a number of topics.

3.2.17 Under the topic of Design: process and tools and sub-heading of Planning for well-designed places (**Paragraph: 001- October 2019**) the PPG states that "development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design

*guides and codes*”. This section of the PPG also introduces the National Design Guide which sets out the 10 characteristics of good design, including:

- “*Context (enhances the surroundings);*
- *Identity (attractive and distinctive);*
- *Built form (a coherent pattern of development);*
- *Movement (accessible and easy to move around);*
- *Nature (enhanced and optimised);*
- *Public Spaces (safe, social and inclusive);*
- *Uses (mixed and integrated);*
- *Homes and Buildings (functional, healthy and sustainable);*
- *Resources (efficient and resilient); and*
- *Lifespan (made to last)”.*

3.2.18 Under the topic of Natural Environment, the sub-heading of Green Infrastructure, **Paragraph 005** (July 2019) focuses on the natural capital that green infrastructure can add to communities including, “*enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes*”. This approach to achieving biodiverse communities is enshrined in **Paragraph 006**, which states:

“*Green infrastructure can help in...*:

- *Achieving well-designed places;*
- *Promoting healthy and safe communities;*
- *Mitigating climate change, flooding and coastal change; and*
- *Conserving and enhancing the natural environment”.*

3.2.19 Under the topic of Natural Environment, sub-heading Landscape, **Paragraph 037** (July 2019) supports the use of LVIA to “*demonstrate the likely effects of a proposed development on the landscape*”. The PPG also makes reference to Natural England’s guidance (Natural England, 2014) on undertaking landscape character assessment “*to complement Natural England’s National Character Area Profiles*”.

3.2.20 PPG Natural Environment, Landscape, **Paragraph 039** (January 2025) requires that “*in exercising or performing any functions in relation to, or so as to affect, land*” in National Parks and National Landscapes, relevant authorities ‘must seek to further’ the purposes for which these areas are designated”.

### 3.3 Local Planning Policy

#### Gravesend Current Local Plan

##### Core Strategy, adopted 2014

3.3.1 The Site lies within the administrative boundary of Gravesham Borough Council (GBC), Kent. Those policies of relevance to the immediate context of the Site and landscape, visual and Green Belt matters are set out below.

3.3.2 **Policy CS01:** Sustainable Development, states that:

*"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."*

3.3.3 **Policy CS02:** Scale and Distribution of Development, states that:

*"...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..."*

3.3.4 The settlement of Culverstone Green is noted as a 'Third Tier Settlement' within the rural area, inset from the Green Belt. **Paragraph 4.2.6** notes that *"these boundaries do not define the full extent of each settlement but relate to a coherent and established built up area where infilling would not adversely affect local character and identity, or impact on the openness of the Green Belt"*.

3.3.5 **Paragraph 4.2.7** notes that *"the national aim of the Green Belt is to prevent urban sprawl by keeping land permanently open"* and sets out the following local planning purposes:

- *"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 assist in safeguarding the countryside by minimising the expansion of the Borough's rural settlements; and"*
- *"To assist in concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet."*

3.3.6 **Paragraph 4.2.8** states that:

*"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."*

3.3.7 **Policy CS12:** Green Infrastructure, states that:

- *"...there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought..."*
- *"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 Areas of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant."*

3.3.8 **Policy CS14:** Housing Type and Size, states that:

*"...the Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area..."*

3.3.9 **Policy CS15:** Housing Density, states that:

*"...all new housing will be developed at a density that is consistent with achieving a good design and does not compromise the distinctive character of the area in which it is situated..."*

3.3.10 **Policy CS16:** Affordable Housing, states that:

*"The provision of affordable housing will be required on all new housing developments of...3 units or more or on sites of 0.1 hectares or more in the rural area.*

*The amount of affordable housing to be provided by private housing development sites above the threshold will be... 35% in the rural area.*

*The Council will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing.*

*In the Green Belt, limited affordable housing in a sustainable location for a proven and justified local community need will be supported..."*

3.3.11 **Policy CS18:** Climate Change, states that:

*"The Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will:*

- *Require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use; and*
- *Require the use of Sustainable Drainage Systems on all developments where technically and financially feasible."*

3.3.12 **Policy CS19:** Development and Design Principles states that:

*"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...this will be achieved through...*

- *Using the collaborative approach advocated in Building for Life 12 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 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.*

- *The design and layout of new residential development...will accord with the adopted Residential Layout Guidelines;*
- *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;*
- *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;*
- *The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change..."*

### Supplementary Planning Guidance

#### Residential Layout Guidelines SPG2, adopted 1996 and amended 2020

3.3.13 The Residential Layout Guidelines were prepared by Gravesham Borough Council to inform the layout of new development, setting out criteria that all planning applications for residential development should comply with. For the most part the criteria relate to the internal arrangement of development proposals, albeit reference is made to privacy distances, overshadowing and amenity space and play space provision. In respect of the consideration and assessment of housing standards as they apply to development proposals, the starting point for decision taking is the development plan.

### Supplementary Planning Documents

#### Design for Gravesham – Design Code SPD, May 2024

3.3.14 The Design for Gravesham – Design Code SPD, published in May 2024, supports the implementation of the Gravesham Local Plan Core Strategy, with particular reference to Policy CS19: Development and Design Principles. The Design Code SPD aims to ensure that development responds to local context and contributes to sustainable, vibrant, and resilient neighbourhoods that meet the needs of the community. Design principles are organised under four themes: *Community First, Quality and Place, Connectivity and Infrastructure, and The Future for Gravesham*.

3.3.15 The Design Code sets out mandatory and recommended design principles for different types of development, including '*medium residential sites (10–150 dwellings)*' to ensure high-quality, contextually responsive design that reflects the character and identity of Gravesham's towns and landscapes.

3.3.16 Key mandatory design principles relevant to medium-scale residential development (10–150 dwellings) include, but are not limited to, those outlined below. Specific policies relating to landscape and visual considerations are quoted in further detail.

- 4.1 – 4.3: promoting community through responding to the local community and character; enhance and contribute to local identity; and responding to local history and context;
- 5.4: promoting inclusive design and accessibility;
- 5.9 - 5.17: built form principles focusing on pattern grain and scale; height; density; thresholds and frontages; roofscape and materials;
- 5.18 - 5.21: focusing on space standards for dwellings; orientation and sunlight; private and communal amenity; and balconies;

- 6.1, 6.2 – 6.5: focusing on public transport and active travel and cycle parking; and
- 6.6 – 6.11: focusing on nature and landscape based principles, including protecting and enhancing blue and green infrastructure; open spaces and green corridors; biodiversity; SuDS; planting; and trees. Listed in more detail in the following paragraphs.

3.3.17 **Design Principle 6.6:** Protecting and enhancing blue and green infrastructure, states:

- a. *“New developments must be designed to conserve, enhance, connect, and improve the use and access of the Borough’s existing blue and green infrastructure.*
- b. *New open space provision must be designed to be inclusive and enjoyable by all community groups.*
- c. *New developments must integrate approaches for the creation of green and blue infrastructure at a doorstep and strategic level, responding to the site context.*
- d. *Trees, hedges, woodland and natural green spaces positively contribute to the sense of identity of a place and should be integrated into the design proposals with a presumption against removal in all instances.”*

3.3.18 **Design principle 6.7:** Open spaces and green corridors, states:

- a. *“Open spaces must be positioned in strategic locations promoting links to the wider green and blue infrastructure.*
- b. *Open spaces must offer opportunities for play, sports and recreation whilst also considering complementary benefits of education and community stewardship.*
- c. *All outdoor play spaces must be located in areas which are well overlooked, accessible from footpaths, and take advantage of the location to offer sunshine, shelter, shade and views where possible.*
- d. *Greening must be comprehensively incorporated with plant species that offer climate change resilience, biodiversity value, considered levels of maintenance and drought tolerance. A complex palette should be promoted including climbing plants, hedgerows, tree avenues, bulb planting, meadow grass and woodland.*
- e. *Open spaces should be easily accessible and inclusive to residents of all ages and offer variety in amenity value.*
- f. *Open spaces should be innovative, open to interpretation, flexible in use; offering opportunities for imaginative play and improving physical, mental and social abilities.*
- g. *Surface water run-off should be utilised as Sustainable Drainage Systems (SuDS) features, reducing impact on underground sewers and allowing for a more natural process.*
- h. *Applicants should use ecology surveys and habitat management plans to inform the proposed approach to creating or managing open spaces and green corridors.”*

3.3.19 **Design principle 6.8:** Biodiversity, states:

- a. *"Biodiversity in Gravesham must be protected and enhanced through the design of streets and spaces.*
- b. *A qualified ecologist must undertake an initial assessment of the biodiversity value of a site before the layout is developed with a view to retaining and enhancing existing biodiversity value on site.*
- c. *A minimum 10% Biodiversity Net Gain must be targeted... and habitats will need to be secured for at least 30 years.*
- d. *New developments should establish ecological networks that are resilient to future climate change pressures.*
- e. *New developments should promote links with the existing blue and green infrastructure through habitat creation and improvement.*
- f. *Opportunities for biodiversity enhancement should be maximised. Measures can consist of:*
  - *Species-rich planting palettes with a bias towards native and wildlife friendly species;*
  - *Habitat creation features such as bird boxes, bat boxes, hedgehog houses, fence gaps for commuting wildlife;*
  - *Re-use of felled trees on site as log piles or dead hedges;*
  - *Biodiverse roofs;*
  - *Integration of sustainable drainage systems (SuDS).*
- g. *Existing trees and valuable habitat features should be integrated into the site layout and landscape design with a presumption against removal.*

3.3.20 **Design principle 6.9:** Sustainable Drainage Systems (SuDS), states:

- a. *"Sustainable Drainage Systems (SuDS) hierarchy must be used and be integral to the design of the streets and spaces.*
- b. *Opportunities for SuDS should be maximised and incorporated within the design of all streets and spaces, either to convey surface water run-off or to attenuate it locally.*
- c. *Applicants should consider the specific characteristics of the site to determine the most appropriate SuDS measures to implement. These can include:*
  - *Planted bio-swales or rain gardens;*
  - *Retention and detention ponds;*
  - *Permeable surfaces.*
- d. *Where SuDS measures are used, in addition to their function as a drainage feature, these should be designed to improve water quality and biodiversity, in consideration of contamination risk to ensure the protection of groundwater and source protection zones in particular..."*

3.3.21 **Design principle 6.10:** Planting, states:

- a. *“Planting design must maximise species diversity, be biased towards wildlife friendly and native species and tolerant of a changing UK climate.*
- b. *New development must not utilise artificial grass in external amenity spaces.*
- c. *A mix of evergreen and deciduous plants with varying qualities should create year round interest with seasonal bulbs and perennials.*
- d. *Street planting should focus on robust, low-growing shrubs that will preserve sight-lines and define areas such as parking and defensible spaces.*
- e. *Amenity lawns should support play and other flexible uses and should be sufficiently large to ensure they are adequately hard-wearing.*
- f. *Selective mowing regimes should be considered to produce grass meadow areas. Diversity should be introduced through bulb or wildflower planting extending the wildlife value.*
- g. *Planting should be set at-grade avoiding raised planters which can dry-out quickly. Soils should be free-draining to avoid heavy rain inundating planting beds.*
- h. *Bedding displays and exotic planting are particularly high maintenance and should be avoided.*
- i. *Vertical greening can make positive contributions to place-making. Suitable climbing plant species should be planted into adequately sized soil volumes. High maintenance intensive green walls should be avoided.*
- j. *Planting design should consider aspect, micro-climate and soil conditions.*
- k. *Planting strategies should consider culinary and edible species to connect local people with their landscape settings.”*

### 3.3.22 Design principle 6.11: Trees, states:

- a. *“Where proposed works may impact existing trees, the applicant must follow British Standard 5837:2012 ‘Trees in Relation to Design, Demolition & Construction: Recommendations’ with oversight by a qualified arboriculturist.*
- b. *Trees and planting must be prevalent along new streets with adequate space allowance above and below ground to protect underground infrastructure from tree root ingress.*
- c. *New tree species must consider canopy size, form, character, drought tolerance, wildlife creation and climate resilience.*
- d. *If existing trees must be felled, mitigation planting within the development must be like-for-like in canopy cover or girth size.*
- e. *New trees must have adequate support and an irrigation pipe for effective watering.*
- f. *Trees in public realm spaces must be no smaller than 20cm girth, budgets should prioritise watering in the first three years.*
- g. *Trees set within planting must be prioritised with trees in intensive pits limited to civic spaces where paved surfaces must reflect footfall.*

- h. *Where applicants propose pruning, works should comply with BS 3998:2012.*
- i. *Proposed tree planting should offer variety and interest (colour, texture, scale, form and seasonality) with a 2m clear-stem to preserve sight-lines.*
- j. *Assumption towards the retention of trees should prevail due to the benefits posed.*
- k. *Trees should be planted as root ball stock in winter months.*
- l. *Applicants should discuss their proposals with the tree officer to understand how trees can best work for their site.”*

### **Kent Design Guide, 2005**

3.3.23 The Kent Design Guide seeks to provide a starting point for good design while retaining flexibility for creative, individual approaches to different buildings and areas, while also seeking to ensure that the best of Kent's places remain to enrich the environment for future generations. It does not seek to restrict designs for any new development to any historic Kent vernacular but instead aims to encourage well considered and contextually sympathetic schemes.

3.3.24 The Kent Design Guide notes that successful places tend to:

- *"Be friendly, safe and attractive;*
- *Be well used – a steady passage of people provides a feeling of safety;*
- *Have public space and squares that draw people together;*
- *Have spaces for public events, markets and performances;*
- *Clearly distinguish private and public areas;*
- *Have building frontages with a direct relationship with the street;*
- *Have clearly defined entrances to buildings used by the public;*
- *Have a network of pedestrian routes and spaces;*
- *Give priority in streets to people rather than to vehicles;*
- *Have clearly defined boundaries for public areas – using hedges, fences and trees;*
- *Have a coordinated approach to street surfaces and furniture - lamps, seats, litter bins, paving, bus shelters and signs."*

3.3.25 It further notes that *"creating a 'sense of place' or 'character' is one of the most important things for new development to achieve..."* With respect to the landscape setting its states that *"the landscape setting of a development site should be understood, extended and enhanced within the site"*, and states that a well-designed landscape will provide:

- *"An attractive setting for a development, its users and occupiers;*
- *A positive environment of wider economic benefit;*
- *A sense of place with a clear identity;*

- A sense of space and enclosure;
- Spatial benefits including integrating the visual impact of the built environment with nature;
- Environmental benefits including micro-climate creation, pollution attenuation and the reduction of water and energy consumption;
- Noise and visual screening; and
- Retention of cultural associations with the natural environment."

3.3.26 With respect to new planting, it is noted that it may take a long time to reach maturity, therefore "...existing features which contribute to amenity and biodiversity should be retained to make the development attractive in its early years..."

### **Emerging Local Plan**

3.3.27 Between April and July 2018, a Regulation 18 Stage 1 consultation was undertaken on **Site Allocations: Issues and Options and Development Management Policies**. Feedback on the Regulation 18 Stage 1 informed the Regulation 18 Stage 2 consultation that ran between October and December 2020. This consultation was split into two parts: part 1 being a partial review of the local plan core strategy and site allocations, with part 2 a draft development management policies document.

### **Gravesham Landscape Sensitivity and Capacity Study, 2016 (Part 1 Site Allocations: Issues and Options - Reg 18 Consultation Documents)**

3.3.28 The Gravesham Landscape Sensitivity and Capacity Study was prepared by LUC on behalf of Gravesham Borough Council and published in March 2016. The study provides an assessment of the landscape and visual sensitivities within defined assessment parcels around existing defined settlements to help inform judgements regarding the capacity of the landscape to accommodate new built development.

3.3.29 The majority of the Site (with the omission of the easternmost part) is identified in **Parcel CG1**, which is described as follows:

*"The parcel joins the west and northern edge of Culverstone Green, on the plateau above the dry valley extending to the west of the A227 and the borough boundary. To the north the boundary is defined by South Street and Heron Hill Lane, with the eastern boundary formed where the topography drops away to the wooded Culverstone Valley. To the west Lion Wood marks the edge of the plateau.*

*The northern boundary, at South Street, contains a line of residential development beyond the defined settlement, set within small scale pasture fields bound by woodland and hedgerows which continue along the A227. Across the main part of the plateau are larger scale fields bound by hedgerows but generally forming a more open landscape..."*

3.3.30 Within this assessment criterion, under the heading of 'physical and natural character', the following is noted: *"The landscape scale plateau landscape is not inherently sensitive..."*. While under the heading of 'settlement form and edge' it notes: *"...to the east, the settlement dips down to the wooded plotland area known as Culverstone Valley, with the gardens of Willow Walk backing onto an area of paddocks and scrub around Blackthorn Farm".*

3.3.31 Under the heading of 'settlement setting' it notes *"...to the north of Willow Walk the landscape dips down towards Culverstone Valley, with the woodland itself forming a strong backdrop."*. Under the heading of

*'perceptual qualities' it refers to the area that encompasses the Site, noting "the smaller pasture fields to the east of the road are more closely associated with the settlement...".*

3.3.32 The following key sensitivities to development are provided:

- *"Role in creating the rural gap and maintaining the sense of separation between Culverstone Green and Meopham Green notably in views from the A227 travelling north –south through the Borough;*
- *Plateau location with potential high visibility and exposure from the wider rural area; and*
- *The adjacent ancient woodland associated with the dry valleys that cut through the plateau which are highly sensitive, and at Culverstone Valley create a wooded setting to Culverstone Green to the east."*

3.3.33 The study outlines that Parcel CG1 has a 'Medium-Low' capacity for development, albeit noting (with respect to the area to the east of the A227, within which the Site lies) the following:

- *"There is some capacity for development in this area to the immediate north of the existing defined settlement within the small scale fields north of Blackthorn Farm. Any development here would be constrained by the steep dry valley slopes and ancient woodland dropping away to the east which forms an important backdrop and setting; and*
- *On the eastern side of A227 (within the area north of Willow Walk and south of Heron Hill Lane) the eastern slopes to the wooded valley are important to the settlement setting and therefore highly sensitive to development. "*

**Draft Development Management Policies Document, October 2020 (Reg 18 Stage 2 Consultation: Part 2)**

3.3.34 **Proposed Policy GI4: Trees, Hedgerows and Woodland**, states:

- *"Development should be designed to retain trees, hedgerows and woodland that contribute positively to the amenity of the site and surrounding area and which are important in terms of landscape, townscape, biodiversity or heritage. Consideration should be given to the incorporation of trees and hedgerows within new development in the interests of sustainability, to integrate with and improve the quality of the local environment and to assist in place making. The use of locally sourced natural species in planting schemes will be expected unless otherwise justified as an exception.*
- *Proposals which threaten the future retention of trees, hedgerows and woodland or other landscape features of importance to a site's character, the amenity of the surrounding area or to wildlife will not be permitted unless the need for, and benefits of, the development in that location clearly outweigh the loss and adequate mitigation and compensation measures can be secured.*
- *In evaluating proposals, the greatest weight will be accorded the retention and protection from harm of areas of ancient woodland and aged and veteran trees, the loss of which will only be allowed in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration of habitat and a suitable compensation strategy exists.*
- *Development proposals that have the potential to result in the loss of or harm to trees, hedgerows or woodland should be supported by a tree survey, arboricultural report and ecological report prepared by a suitably qualified professional...*

- *Where the loss of trees, hedgerows or woodland have a potential landscape impact, the proposal should also be supported by a landscape report prepared by a suitably qualified person detailing those impacts and proposed means of mitigation.*
- *Where planning permission is granted for proposals that result in the loss of or damage to trees, hedgerows or areas of woodland, conditions will be imposed requiring the submission of a final landscaping scheme for the prior written approval of the Council and details of how that landscaping will be maintained in the long-term, including provision for the replacement of planting that dies or becomes diseased before it becomes established.”*

3.3.35 **Proposed Policy GI5:** Landscape Character, states:

- *“Development proposals will be expected to contribute to and enhance landscapes in a manner commensurate with their status and achieve a high-quality design that is responsive to context and reinforces landscape character.*
- *Applications for proposals that are likely to have an adverse landscape impact should be accompanied by a proportionate evidence base in the form of a statement or formal Landscape Visual Impact Assessment (as appropriate) prepared by a suitably qualified person setting out the nature and scale of any such impacts (including cumulative impacts) and how these will be mitigated...*
- *In determining applications, the Council will have regard to the Gravesham Landscape Character Assessment (or subsequent updates) and the Kent Downs AoNB Management Plan and associated guidance as material considerations.”*

3.3.36 **Proposed Policy GI6:** Biodiversity, states:

- *“Proposals, the primary purpose of which are to conserve or enhance biodiversity and the creation of a coherent network of ecological sites, stepping stones and pathways will be supported. Opportunities should be taken to connect and improve ecological networks and linkages both within Gravesham and to similar networks in adjoining areas.*
- *Development proposals should seek to achieve measurable net gains for biodiversity in accordance with national policy and guidance and be supported by a proportionate evidence base prepared by a suitably qualified person demonstrating how this will be achieved. How the mitigation hierarchy (i.e. avoid, mitigate, compensate) has been applied in designing the scheme should also be demonstrated, with justification being provided for all unavoidable impacts on biodiversity.*
- *Proposals for biodiversity net gain, mitigation or compensation will be required to be acceptable in terms of design, location and impact. Applicants will also be required to demonstrate that the delivery and long-term management of such measures can be secured.*
- *Applications resulting in significant harm to biodiversity which cannot be avoided, mitigated or compensated for will not be permitted unless material considerations indicate otherwise. In addition to the requirements set out above:*
- *...Development resulting in the loss or deterioration of irreplaceable habitats will not be permitted unless there are wholly exceptional reasons where the public benefit would clearly outweigh such loss or deterioration and a suitable, acceptable and deliverable compensation strategy exists.*

- *Development should avoid harm to locally identified biodiversity assets (including Local Wildlife Sites...) as well as priority and locally important habitats and species, in accordance with national policy..."*

### 3.3.37 Proposed Policy FW5: Managing Surface Water Drainage, states:

- *"The Council will require the use of sustainable drainage within developments, where this is appropriate. In the case of major developments, there will be a presumption that Sustainable Drainage Systems will be used to manage surface water run-off and alternatives will not be approved unless it is demonstrated, through the submission of evidence, that it is not feasible or inappropriate to do so..."*
- *"In designing Sustainable Drainage Systems, applicants will also be expected to show that they have considered opportunities to incorporate features to improve water quality, mitigate pollution, and enhance green infrastructure (including biodiversity) where it is appropriate to do so."*

### **Draft Strategic Housing Land Availability Assessment (SHLAA), 2020 Update (Reg 18 Stage 2 Consultation)**

3.3.38 The Site is identified as a developable site '**GBS-Q**' within the Draft SHLAA (Appendix D(iii)). Under the 'Suitability' section, the SHLAA outlines the following and indicates an approximate yield of 109 dwellings:

*"Suitability: The site is located on the edge of the inset settlement of Culverstone Green. There is no formal access to the site, but there is scope to provide an access from Wrotham Road to the northern section of the site. Access to the southern part of the site would involve the demolition of Marycroft and the loss of priority habitat.*

*The site lies within the Meopham Downs LCA and within an area of medium-high sensitivity. With landscape mitigation, development could be absorbed into the landscape without adverse impacts.*

*The eastern edge of the site boundary abuts ancient woodland and a 15m buffer would be required to minimise harm to the woodland. This would reduce the developable site area. The southern half of the site is an area of priority habitat and development would need to safeguard its biodiversity value. The western part of the site fronting Wrotham Road is grade 3 agricultural land.*

*Overall, the northern part of the site is suitable for development, however the site lies in the Green Belt and this designation would need to change."*

### **The Gravesham Stage 2 Green Belt Study and Appendices, August 2020 (Reg 18 Stage 2 Consultation)**

3.3.39 The Site falls within **Parcels CG2 and CG3** of the Culverstone Green Area, as identified in the Gravesham Stage 2 Green Belt Study (Figure 5.3: Harm Assessment). Parcel CG2, which comprises the northern part of the Site, is assessed as having 'Moderate–High' harm, while Parcel CG3, covering the south-eastern portion, is assessed as 'Moderate'.

3.3.40 Although Parcels CG2 and CG3 are rated as 'Moderate–High' and 'Moderate' respectively, these scores are considered to overstate the Site's contribution to Green Belt Purpose 3 (safeguarding the countryside from encroachment). It is also notable that other draft allocations have been proposed on land with similar or higher harm ratings. Therefore, the inflated assessment of CG2 and CG3 should not preclude the Site's potential for development, particularly in light of the proposed Tier 3 settlement hierarchy for Culverstone Green.

3.3.41 The Gravesham Stage 2 Green Belt Study further notes that “*release of the parcel as a whole...would result in boundaries that would be clearly defined by Heron Hill Lane to the north, the tree lined track and woodland block with land sloping down to the east and South Street to the west*” and that “*there would be no additional harm resulting from increased containment of adjacent Green Belt land*”.

### 3.4 Summary

3.4.1 The Site lies within the administrative boundary of Gravesham Borough Council (GBC). The landscape policy context includes relevant national and local planning guidance concerning landscape character, visual amenity and Green Belt policy.

3.4.2 National policy, including the National Planning Policy Framework (2024) and Planning Practice Guidance, promotes sustainable development, high-quality design, and the protection and enhancement of landscape character. The introduction of the ‘grey belt’ concept is a material consideration in plan-making and development decisions and is addressed in subsequent chapters of this LVIA.

3.4.3 Locally, the **Gravesham Local Plan Core Strategy (2014)** provides the principal planning framework. Relevant policies include support for sustainable growth (Policy CS01), protection of the Green Belt (Policy CS02), and conservation of landscape character, green infrastructure, and design quality (Policies CS12 and CS19). Culverstone Green, where the Site is located, is identified as a Tier 3 rural settlement inset from the Green Belt. The Core Strategy acknowledges that some Green Belt release may be necessary to meet housing needs.

3.4.4 The **Design for Gravesham – Design Code SPD (2024)** supplements Policy CS19, establishing detailed design principles for medium-scale residential development. It provides guidance on the integration of green infrastructure, biodiversity net gain, SuDS, and high-quality landscape design, with a focus on contextually responsive development.

3.4.5 The **Gravesham Landscape Sensitivity and Capacity Study (2016)** identifies most of the Site within Parcel CG1, with a medium–low capacity for development. It notes some potential for development in smaller fields north of Blackthorn Farm, subject to the protection of the adjacent dry valley and ancient woodland.

3.4.6 The **Draft Strategic Housing Land Availability Assessment (2020)** identifies the Site (ref: GBS-Q) as developable, with an indicative capacity of 109 dwellings. Key constraints include access, proximity to ancient woodland, biodiversity value and that any future development would require review and amendment of the Green Belt boundary.

3.4.7 The **Gravesham Stage 2 Green Belt Study (2020)** places the Site within Parcels CG2 and CG3, rated ‘Moderate–High’ and ‘Moderate’ in terms of harm. These assessments are considered to overstate the Site’s contribution to Green Belt purposes, particularly Purpose 3 (safeguarding the countryside from encroachment). The Study notes that the Site could be released without additional harm, owing to the presence of strong, defensible boundaries.

3.4.8 In conclusion, the planning policy context supports well-designed, landscape-led development where it can be demonstrated that proposals respond positively to local character, conserve key landscape features and integrate appropriate mitigation. While the Site lies within the Green Belt, the supporting evidence base indicates potential for sensitive development, subject to detailed landscape and visual assessment as set out in the following chapters of this LVIA.

## 4 LANDSCAPE CHARACTER CONTEXT

### 4.1 Landscape Character Assessment

4.1.1 The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. This approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF. The description of each landscape is used as a basis for evaluation, in order to make judgements to guide, for example, development or landscape management. The various landscape areas are shown on **Figure 4: Landscape Character Plan**, and extracts are provided in **Appendix B: Published Landscape Character Guidance Extracts**.

### 4.2 National Landscape Character

4.2.1 As part of Natural England's responsibilities in delivering the Natural Environment White Paper, Biodiversity 2020 and the European Landscape Convention, Natural England has developed a series of National Character Area (NCA) profiles. These NCA profiles include an outline of the key characteristics that define broad landscape character areas.

4.2.2 The Site is predominantly covered by **NCA Profile 119: North Downs**<sup>12</sup>. The area is described as "*a chain of chalk hills extending from the Hog's Back in Surrey and ending dramatically at the internationally renowned White Cliffs of Dover... Twisting sunken lanes, often aligned along ancient drove roads, cut across the scarp and are a feature of much of the dip slope*".

4.2.3 The key characteristics of NCA Profile 119: North Downs, of relevance to the Site and surrounding area, are outlined as follows:

- "...A distinctive chalk downland ridge rises up from the surrounding land, with a steep scarp slope to the south providing extensive views across Kent, Surrey and Sussex and across the Channel seascape to France;
- *The broad dip slope gradually drops towards the Thames and the English Channel, affording extensive views across London and the Thames Estuary. The carved topography provides a series of dry valleys, ridges and plateaux;*
- *The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole. The river valleys cut through the chalk ridge, providing distinctive local landscapes which contrast with the steep scarp slope;*
- *The south-facing scarp is incised by a number of short, bowl-shaped dry valleys, cut by periglacial streams and often referred to as combes. The undulating topography of the dip slope has also been etched by streams and rivers, today forming dry valleys, some of which carry winterburnes that occasionally flow in the dip slope, depending on the level of the chalk aquifer;*
- *The footslope of the escarpment supports arable cropping, the dominant land use within the NCA. In the east, the richer, loamy soils of the lower dip slope support large tracts of mixed arable and horticultural production;*
- *Woodland is found primarily on the steeper slopes of the scarp, valley sides and areas of the dip slope capped with clay-with-flints. Well-wooded hedgerows and*

<sup>12</sup> [NCA Profile:119: North Downs - NE431](#)

*shaws are an important component of the field boundaries, contributing to a strongly wooded character. Much of the woodland is ancient...; and*

- *Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern, with local flint, chalk and Wealden brick the vernacular materials..."*

## 4.3 County Landscape Character

### The Landscape Assessment of Kent, October 2004<sup>13</sup>

4.3.1 The Landscape Assessment of Kent was prepared by Jacobs Babtie on behalf of Kent County Council and was published in October 2004. The Landscape Assessment of Kent identifies a number of different Landscape Character Areas (LCAs) across Kent and provides a description of and vision for each LCA.

4.3.2 The Site is located within the **Ash Down Kent Character Area**, which consists of deep, dry valleys with wooded ridges and broad plateau tops. The area features a mix of small villages and 20th-century settlements, with extensive arable farmland on the plateaus and well-maintained hedgerows along winding lanes. It stretches from the A20 to the A227 and includes the settlements of Meopham and Longfield.

4.3.3 The key characteristics of the Ash Down Kent LCA identified in the Assessment include:

- *"A pleasant mix of deep, dry pastoral valleys enclosed by wooded ridges and species rich hedgerows, with broad plateau tops beyond;*
- *Small valley-bottom villages and large 20th century settlements on plateau; and*
- *A winding network of narrow, historic lanes often eroded by traffic"*

4.3.4 The condition of the Ash Downs LCA is identified as 'Good', noting *"the pattern of landscape elements is coherent and, in most cases, reflects the underlying landform"* and that *"some visual detractors such as commercial buildings and unsympathetic land uses intrude into some of the views"*. Additionally, it notes *"the condition of heritage features such as field boundaries and vernacular buildings is good, however, much recent isolated development using unsympathetic materials has a negative impact."*

4.3.5 The sensitivity of the Ash Downs LCA is identified as 'High', stating:

*"The characteristic features of this landscape are strongly represented and portray both an historic and ancient time-depth. Recent development of urban areas has a localised effect; the area retains local distinctiveness and a strong sense of continuity. The existing highways and the evidence of vernacular materials (such as flint) in historic buildings, in particular, enhance the sense of place. Visibility is moderate due to the intermittent tree cover."*

## 4.4 Local Landscape Character

### Gravesham Landscape Character Assessment, May 2009<sup>14</sup>

4.4.1 The Gravesham Landscape Character Assessment, which identifies eleven distinct LCAs within Gravesham Borough, was prepared by Jacobs on behalf of Gravesham Borough Council and was published in May 2009. The Site and the surrounding area is identified within the **Meopham Downs LCA**, the key characteristics of which are outlined as follows:

<sup>13</sup> [Landscape Assessment of Kent 2004](#)

<sup>14</sup> [https://Gravesham\\_Landscape\\_Character\\_Assessment\\_May\\_2009.pdf](https://Gravesham_Landscape_Character_Assessment_May_2009.pdf)

- "Gently undulating topography with a mixture of arable and pasture farmland;
- Neat pattern of small square fields in the south;
- Broader irregular shaped fields to the north;
- Narrow lanes and roads lined with hedgerows;
- Three large settlements located along A227 running east and west; and
- Traditional architecture surrounding village greens provide local vernacular."

4.4.2 It is noted that the condition of the LCA is 'Good' and that "*the pattern of landscape elements is coherent, with few visual detractors. Established hedgerows and small woodland clumps limit the visual impact of detractors. Hedgerows are native and in good condition, providing ecological corridors along field boundaries. Woodland clumps are mostly native and mature and vary in condition, whilst the remains of orchards are in poor condition*", while the sensitivity of the LCA is assessed as 'Moderate', stating:

*"The key characteristic elements of the landscape are distinct, providing coherency and a strong sense of place within the landscape. Although woodland is restricted to small woodland clumps, hedgerows that run along field boundaries are historic and distinct. Both the settlements of Meopham and Meopham Green have distinct traditional village centres. In addition, traditional vernacular architecture can be found scattered across the landscape. The other two remaining settlements have more recent architecture that is less in keeping with the local vernacular. Strength of character and visibility are moderate, providing a moderate sensitivity overall."*

## 4.5 Published Landscape Guidance

### National Landscape Guidelines

4.5.1 With respect to NCA 119: North Downs, the following Statements of Environmental Opportunity of relevance to the Site are provided:

- "SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations;
- SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs.... recognising their contribution to sense of place, sense of history and tranquillity...; and
- SEO 4: Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness..."

4.5.2 The following landscape opportunities of relevance to the Site are identified:

- "...Protect, conserve and enhance the characteristic medieval settlement pattern of small, nucleated villages along spring lines, within valleys and on the lower dip slope linked by winding, often sunken lanes, along with the strong local flint, chalk and Wealden brick vernacular of traditional architecture, with new building sensitive to local styles and materials...; and

- *Manage, conserve, enhance and restore the characteristic pattern of thick well-treed hedgerows and shaws, forming a predominantly irregular field pattern..."*

4.5.3 The key characteristics and SEOs provide useful background and context to the character of the wider area and the overarching aims for management of the landscape. However, due to the extensive area of the NCA in relation to the Site, and the wide range of landscape characteristics found within it, it is considered highly unlikely that the Proposed Development has the potential to result in appreciable effects on the character of the NCA as a whole. Therefore, this NCA has been scoped out of further assessment within the LVIA.

### **County Landscape Guidelines**

4.5.4 Landscape management and development guidelines for the Ash Downs LCA include the following landscape actions:

- *"Conserve broadleaf woodland cover;*
- *Conserve small scale field pattern on valley sides Conserve wooded edges to arable plateau Conserve the impact of vernacular materials and the historic scale of built form;*
- *Conserve the enclosure of settlements within wooded areas; and*
- *Conserve original highway characteristics"*

4.5.5 The key characteristics and landscape guidelines provide useful background and context to the character of the wider area and the overarching aims for management of the landscape within this LCA. However, due to the extensive area of this LCA in relation to the Site and the wide range of landscape characteristics found within it, it is considered highly unlikely that the Proposed Development has the potential to result in appreciable effects on the character of this County LCA as a whole. Therefore, Ash Downs LCA has been scoped out of further assessment within the LVIA.

### **Local Landscape Guidelines**

4.5.6 The following guidelines of relevance to the Site are provided for the Meopham Downs LCA:

- *"Conserve and reinforce the traditional landscape structure and where necessary introduce new elements they should respect and enhance the pattern;*
- *Conserve characteristic narrow winding lanes and dense native hedgerows;*
- *Conserve traditional character of built environment by drawing on traditional building materials and techniques for new development;*
- *Reinforce the enclosure of settlements within wooded areas;*
- *Conserve and reinforce broadleaf woodland cover and wooded edges to arable plateau;*
- *Encourage the use of local produce to support traditional land uses such as orchards;*
- *Explore new horticultural land uses; and*
- *Conserve and reinforce agricultural land use."*

## 4.6 Summary

4.6.1 The Site lies within a gently undulating landscape, characterised by arable farmland, dry valleys, ancient woodland and a traditional settlement pattern. Nationally, it forms part of National Character Area 119: North Downs, noted for its chalk landform, wooded slopes, dry valleys, and small nucleated villages featuring vernacular materials such as flint and brick.

4.6.2 At the county scale, the Kent Landscape Assessment places the Site within the Ash Downs Character Area, a visually appealing landscape of broad plateau tops, enclosed valleys and wooded ridges. The area exhibits a strong historic structure and is highly sensitive to change, with narrow lanes and a mix of traditional and later settlement forms.

4.6.3 Locally, the Gravesham Landscape Character Assessment identifies the Site within the Meopham Downs LCA, which features a coherent landscape structure of arable and pasture fields, mature hedgerows, small woodland clumps and historic settlements. While generally in good condition, the landscape is of moderate sensitivity due to its vernacular architecture, historic lanes and intact field patterns.

4.6.4 Across all levels, published guidance consistently promotes the conservation and enhancement of rural character, woodland, hedgerows and field structure. There is a strong emphasis on context-sensitive design that respects local character, reinforces landscape features, and supports the distinct identity of settlements.

4.6.5 Key relevant considerations and guidance include:

- Conserve and enhance the character, including historic features, woodland, hedgerows and traditional field patterns;
- Restore and manage native woodland, wooded edges and hedgerows to reinforce landscape structure and biodiversity;
- Maintain settlement separation, tranquillity and the sense of enclosure provided by topography and vegetation;
- Ensure development reflects local vernacular in scale, form and materials;
- Reinforce traditional landscape patterns and village identity;
- Respect landform, key views and distinctive local features contributing to sense of place;
- Retain and enhance the character of historic lanes and avoid suburbanising design; and
- Integrate multifunctional green infrastructure to deliver visual, ecological and recreational benefits.

## 5 LANDSCAPE AND VISUAL APPRAISAL

### 5.1 Overview

5.1.1 The Site and the surrounding landscape was visited in May 2025, with **Site Appraisal Photographs A - G** illustrating the existing character of the Site. The locations from which the Site Appraisal Photographs were taken are shown on **Figure 4: Site Appraisal Plan**. The visual context of the Site is illustrated by **Site Context Photographs 1 - 10**, the locations of which are illustrated on **Figure 5: Visual Appraisal Plan**.

### 5.2 Landscape Appraisal

5.2.1 A landscape appraisal has been undertaken to ascertain the existing character of the Site. This is accomplished through recording and analysing the existing landscape features and characteristics, the way the landscape is experienced, and the value or importance of the landscape and visual resources in the vicinity of the Site. The elements of the landscape that contribute to landscape character include the built and natural form, the pattern of features, detailing, scale, planting, land use and human perception. In this regard, landscape character is derived as a result of the perception of, and action and interaction of, natural and human factors.

5.2.2 **Site Appraisal Photographs A, B and C** illustrate the western field as a large, gently undulating pastoral space, enclosed by mature tree belts to the north and west. These vegetated boundaries provide strong visual containment, substantially limiting intervisibility with the adjacent A227 South Street and its associated built form. The field rises subtly towards the south-western boundary closer to Mitford House, contributing to a sense of enclosure and an inward-facing character.

5.2.3 Built form to the north of the Site, including Hope Cottages and a vehicle maintenance and storage yard, introduces a degree of urbanising influence. The white-rendered gable end of Hope Cottages forms a particularly prominent feature within the localised setting. Post-and-rail fencing and a sparse internal tree belt further contribute to the perception of human influence. The overall landscape remains coherent and is visually self-contained. Towards the east, the Site becomes more enclosed, with long-range views curtailed by dense vegetation that extends through and partly defines the eastern boundary.

5.2.4 **Site Appraisal Photograph D**, taken from a central location within the Site, illustrates the enclosed, agricultural character of the western field. The post-and-rail fencing across this area is generally in good condition and defines a series of paddocks associated with the Site's equestrian use. A sand school (manège) forms the primary feature within this part of the Site, occupying a levelled area and reinforcing the equestrian land use. In proximity to the manège lies the built form of Blackthorn Farm, comprising a small cluster of single-storey structures arranged informally around a central hardstanding or yard area. These buildings are functional in character and vary in condition. They include timber stables, corrugated metal sheds, and portable storage containers, with ancillary items such as trailers, horseboxes and feed bins distributed across the yard. While limited in scale and height, the buildings lack architectural cohesion and contribute to a slightly untidy and utilitarian appearance, consistent with the Site's working agricultural identity. Vegetation remains relatively robust throughout the Site, with the western boundary in particular continuing to perform a strong visual containment role. However, the remnant tree belt that runs north-south through the centre of the western field is fragmented and intermittent in places. This degradation reduces the scenic quality of the area and undermines the visual coherence of the Site's internal landscape character.

5.2.5 The eastern part of the Site, as shown in **Site Appraisal Photographs E, F and G**, exhibits a distinctly different landscape character. **Site Appraisal Photograph E** reveals that the north-eastern corner features a more pronounced slope relative to other areas. The combination of topography, the aspect of the field, and the dense enclosing vegetation on all sides contributes to a heightened sense of rurality and tranquillity. These characteristics reinforce a perceptual sense of separation from the surrounding settlement.

5.2.6 In contrast, **Site Appraisal Photographs F and G** indicate areas where the built form of Blackthorn Farm and nearby properties fronting the A227 South Street are visible. These elements result in limited intervisibility and introduce a degree of urbanising influence. The presence of such built features locally interrupts the sense of enclosure and marginally reduces the Site's visual amenity quality. However, the strong vegetative structure along the eastern and southern boundaries continues to contribute to a sense of enclosure. Consequently, the Site remains visually and physically distinct from the wider landscape to the east and south.

5.2.7 The Site is considered to be of *low landscape value* as:

- The Site is generally not of noteworthy scenic beauty, it primarily comprises a series of ordinary pastoral fields with areas of ruderal vegetation, enclosed by woodland and tree belts typical of the local landscape context;
- The Site is not particularly remote or tranquil, given its proximity to existing built development and the highway network and does not have an air of tranquillity. An exception is the north-eastern field, which displays a more tranquil and enclosed character;
- The Site does not form part of the historic landscape setting to a noted heritage asset;
- There is currently no public access to the Site, and it does not provide opportunities for recreation or community use.
- The Site is not subject to any statutory or non-statutory landscape designations.

### 5.3 Landscape Receptors

5.3.1 Based on a review of published landscape character assessments and appraisal of the Site and its context, the following landscape character receptors have been identified for assessment. These receptors include key features contributing to the character of the Site, against which the potential effects of the Proposed Development have been evaluated. Each has been considered in terms of its value, susceptibility to change, and overall sensitivity to development of the type proposed.

#### Local LCA Meopham Downs (Gravesend)

5.3.2 At a local level, the Site lies within the Meopham Downs Landscape Character Area (LCA), as defined in the *Gravesend Landscape Character Assessment* (Jacobs, 2009) and summarised in Chapter 4. This LCA is characterised by a gently undulating landscape comprising a mix of arable and pastoral farmland, interspersed with narrow lanes lined by native hedgerows and small settlements concentrated along the A227. Features such as traditional village greens and vernacular architecture contribute to a coherent and recognisable character.

5.3.3 The landscape value of the Meopham Downs LCA is assessed as **Medium** at the local level. Although the area is not subject to national designation, it contains a number of locally valued features, including a strong field structure, historic hedgerow networks, and traditional built form. These elements contribute to local distinctiveness and are supported by published management guidance advocating their protection and enhancement.

5.3.4 The susceptibility of the LCA to the type of development proposed is also considered **Medium**. The landscape has a coherent pattern and can accommodate some development, provided it aligns with the existing field structure, respects the scale and vernacular of adjacent settlements, and reinforces characteristic features such as hedgerows and woodland edges. However, the intact and nature of the character of the area limits its tolerance for poorly integrated or out-of-scale change.

5.3.5 Taking both landscape value and susceptibility into account, the overall sensitivity of the Meopham Downs LCA to the type of development proposed is assessed as **Medium**. While the area has capacity to accommodate change, this is contingent upon a development approach that complements the established landscape structure and reinforces local character.

### Agricultural Fields

5.3.6 The Site comprises several pastoral fields of varying size and condition. The larger western field is open in character, though its visual quality is compromised by the presence of adjoining built form, including Hope Cottages and a nearby vehicle storage yard, both of which detracting elements in the setting of the Site. In contrast, the north-eastern field is more enclosed and exhibits a tranquil character, supported by well-established vegetation along its boundaries.

5.3.7 The agricultural fields are not designated nor particularly rare within the local landscape context. Their condition is mixed, with some areas, particularly in the west appearing visually degraded due to boundary erosion and the influence of neighbouring development. The perceptual quality of the eastern field is higher, owing to its contained character and limited visual disturbance. As such, the fields are assessed as having an overall **Low** landscape value.

5.3.8 This landscape feature is considered to have limited capacity to accommodate development of the type proposed without resulting in a fundamental and permanent change to its character. As such, the susceptibility of the agricultural fields to the type of development proposed is assessed as **High**.

5.3.9 Taking account of their Low value and High susceptibility, the agricultural fields are judged to have an overall **Medium** sensitivity to the type of development proposed.

### Field Boundaries

5.3.10 Field boundaries along / within the Site comprise mature treebelts, fragmented internal hedgerows, and timber post-and-rail fencing. The western, northern and eastern edges are defined by well-established vegetation belts that provide visual enclosure and reinforce the Site's landscape structure. The eastern boundary, in particular, appears mature and continuous, likely forming part of a wider woodland habitat given its proximity to ancient woodland.

5.3.11 The field boundaries contribute positively to the Site's ecological, visual and structural characteristics, acting as a buffer between the interior of the Site and the surrounding landscape. Although some internal hedgerows are in poor condition, the outer boundaries are generally robust. While undesignated and with limited wider recognition, the field boundaries support local landscape character. Their landscape value is therefore assessed as **Medium**.

5.3.12 The susceptibility of the field boundaries to change is considered **Medium**. While the type of development proposed seeks to retain the outer treebelts, some tree loss will be required to facilitate vehicular and emergency access from the A227 South Street. Where removal occurs, the time required for newly planted vegetation to reach maturity means that any replacement planting will not immediately replicate the existing function.

5.3.13 In recognition of the above and considering their visual, ecological, and structural roles, the overall sensitivity of the field boundaries is assessed as **Medium**.

### Woodland and Tree Belt within the Site

5.3.14 Two wooded features contribute to the internal landscape structure of the Site. The first is a block of woodland separating the eastern and western parcels, comprising predominantly native tree species. This woodland forms a strong visual and physical barrier, reinforcing the sense of enclosure and tranquillity within the eastern parcel. The second feature is a linear tree belt running east-west within the western parcel. Although fragmented in parts, it provides vertical structure, localised visual screening, and contributes to the legibility and rhythm of the landscape by breaking up the perceived scale of the western field.

5.3.15 Together, the woodland and tree belt offer visual containment, ecological connectivity and support the potential integration of the type of development proposed within a mature landscape framework. While undesignated, these features positively influence local landscape character. Reflecting their contribution, the landscape value of the woodland and tree belts is assessed as **Medium**.

5.3.16 The susceptibility of these features to change is assessed as **Medium**. There is the potential to be retained within the development framework, and their maturity and established structure would be difficult to replicate if loss or fragmentation occurs. The woodland block is particularly susceptible, with even limited encroachment, including into the Root Protection Area (RPA), likely to reduce its contribution to landscape character and structure.

5.3.17 Taking into account their value and susceptibility, the overall sensitivity of the woodland and tree belts is assessed as **Medium**. Their retention, along with appropriate buffers, long-term management, and reinforcement planting, is essential to maintain their role in providing landscape character, visual screening, and habitat connectivity.

### **Built Form within the Site (Blackthorn Farm)**

5.3.18 Blackthorn Farm comprises a cluster of functional buildings, including barns, sheds, and mobile units, located in the southern part of the Site and currently used for equestrian or agricultural purposes. The built form is utilitarian in character, lacking architectural merit, heritage value, or cultural association. It is visually contained by boundary fencing and surrounding vegetation and does not contribute to the scenic or aesthetic qualities of the wider landscape.

5.3.19 As such, the landscape value of infrastructure associated with Blackthorn Farm is assessed as **Low**, given its limited visual or perceptual contribution and lack of recreational, cultural, or historic interest. However, this receptor does not have capacity to accommodate development of the type proposed without resulting in fundamental and permanent change to its form and function or removal from the Site. Its susceptibility to change is therefore considered **High**.

5.3.20 Taking both value and susceptibility into account, the overall sensitivity of the infrastructure associated with Blackthorn Farm as a landscape receptor is assessed as **Medium**.

### **The Character of the Site and its Immediate Vicinity**

5.3.21 The character of the Site is defined by its current land use, surrounding context, and internal landscape structure. It comprises a series of pastoral fields, some of which contain areas of ruderal or unmanaged vegetation, enclosed within a well-defined framework of tree belts and woodland. While the north-eastern field conveys a more tranquil character, much of the Site is influenced by adjacent built form and infrastructure. The proximity of Hope Cottages, the adjoining industrial premises, and the A227 South Street introduces urbanising elements that diminish any strong perception of remoteness.

5.3.22 The Site is not part of a designated landscape and does not contribute to the setting of any nationally or locally designated heritage asset. It does not offer public access or provide opportunities for informal recreation. Although mature vegetation, particularly to the east creates a degree of enclosure, the wider Site is relatively ordinary in character, with a mixed condition due to encroaching development and land-use impacts.

5.3.23 On this basis, the landscape value of the Site is assessed as **Low**, reflecting the absence of scenic quality, recreational function, historic interest, or designation. While the eastern field offers a marginally more positive perceptual experience, this is not sufficient to elevate the value of the Site as a whole.

5.3.24 The susceptibility of the Site's character to change is assessed as **Medium**. The eastern parcel exhibits a more enclosed and intimate character, while the remainder of the Site is already influenced by built form and visual detractors. Existing vegetation, particularly along the eastern and western boundaries, provides strong visual containment and offers the Site some capacity to absorb development without fundamentally altering its character. Taking both value and susceptibility into account, the overall sensitivity of the Site and its immediate setting is assessed as **Low to Medium**.

**Table 5.1: Summary of Landscape Receptor Sensitivity**

Receptor	Value	Susceptibility	Sensitivity
Local LCA Meopham Downs	Medium	Medium	<b>Medium</b>
Agricultural Fields	Low	High	<b>Medium</b>
Field Boundaries	Medium	Medium	<b>Medium</b>
Woodland and Tree Belt within the Site	Medium	Medium	<b>Medium</b>
Built Form within the Site (Blackthorn Farm)	Low	High	<b>Medium</b>
The Character of the Site and its Immediate Vicinity	Low	Medium	<b>Low to Medium</b>

## 5.4 Visual Appraisal

5.4.1 A visual appraisal has been undertaken to determine the relationship of the Site with its surroundings and its approximate extent of visibility within the wider landscape from publicly accessible locations.

5.4.2 The potential visibility of the Site is largely determined by the intervening landform, as topographic features such as ridgelines and subtle undulations may block or curtail views towards the Site. In addition, land cover has an important role in determining potential visibility as woodland, treebelts or built forms may contribute to additional blocking, filtering or curtailing of views.

5.4.3 The effectiveness of vegetation as a screen depends to a considerable extent on its scale. A large mature feature will form a substantial screen throughout the year, but a hedgerow or intermittent treebelt may only be effective during the summer months. Whilst small features, such as hedgerows and individual trees can be very important, particularly when their combined effect is taken into account, they cannot be considered to be substantial or wholly effective screening features or visual barriers due to the seasonal nature of their effect.

5.4.4 **Site Context Photographs 1 to 10** confirm that views into the interior of the Site are largely restricted to properties and vantage points immediately adjoining the Site boundary. Even from locations in close proximity, visibility is heavily constrained by mature vegetation that encloses much of the Site, supplemented in parts by surrounding built form. The extent of the Site's visual envelope is indicated on **Figure 5: Visual Appraisal Plan**, which also identifies the locations from which these photographs were taken.

5.4.5 As illustrated in **Site Context Photograph 1**, views southward from Heron Hill Lane and Public Right of Way (PRoW) NS284 are screened at ground level by industrial premises immediately north of the Site. Moving westwards, **Site Context Photograph 2** shows that views from the A227 are similarly curtailed by intervening residential built form, including properties that abut the Site's north-western boundary.

5.4.6 Further north along the A227 South Street, **Site Context Photograph 3** demonstrates that roadside vegetation lining the carriageway continues to truncate views towards the Site. Nonetheless, glimpsed built form associated with Chapmans Hill is visible in the right of the frame and is perceived as defining the northern edge of the main settled area of Culverstone Green.

5.4.7 **Site Context Photograph 4**, taken from a wooded ridge along PRoW NS285 to the east of the Site, confirms that dense woodland cover filters the majority of views in this direction. However, a single vantage point affords partial views of the eastern portion of the Site, with vegetation remaining a dominant visual element in the composition.

5.4.8 Further north, **Site Context Photograph 5** shows that rising landform intervenes to effectively screen the Site from view. At greater distance to the north-east, as illustrated in **Site Context Photograph 6** (taken from PRoW NS265 at over 1km), the Site is again obscured by vegetation. However, the internal tree belt running through the centre of the Site is discernible on the skyline, while surrounding built form along the A227 is visible in the middle distance.

5.4.9 **Site Context Photograph 7**, taken from the A227 adjacent to the Site's western boundary, reveals that glimpsed views are available through intermittent vegetation. These views are typically fleeting and oblique in nature, primarily experienced by road users in motion. Further south, **Site Context Photograph 8** confirms that built form and vegetation adjoining the Site's southern boundary provide effective screening. From more distant locations to the west and south-west, illustrated in **Site Context Photographs 9 and 10**, the Site is not readily perceptible within the wider landscape due to intervening topography, vegetation and built form.

## 5.5 Visual Receptors

5.5.1 On the basis of the visual appraisal, a series of visual receptors have been selected against which the effects of the Proposed Development on visual amenity have been assessed. Visual receptors, together with their susceptibility, value of views, and resultant overall sensitivity of receptor to development of the type proposed are set out below:

### Residents on A227 South Street and Chapmans Hill (SCP 2 and 7)

5.5.2 This receptor group comprises residents of properties immediately adjoining the northern and north-western boundaries of the Site, including those located near Hope Cottages, South Street and Chapmans Hill. As illustrated in SCP 2 and 7, views into the Site are heavily restricted by intervening built form and mature vegetation, including the adjacent industrial premises and established boundary planting. Although these properties are situated close to the Site, the visibility of the Site's interior is very limited. As residents, these receptors are considered to have a **High** susceptibility to the proposed development, due to the potential influence on their amenity and outlook. However, the value of the view is considered **Low**, as the views are not designated and lack cultural or scenic association. On balance, the overall sensitivity of this receptor group is assessed as **Medium**.

### Industrial/ Commercial Users on Heron Hill Lane / PRoW NS284 (SCP 1)

5.5.3 This receptor group includes workers at commercial or industrial premises adjoining the northern edge of the Site. As shown in SCP 1, views are curtailed by the presence of built form and boundary vegetation. These receptors typically have a low level of visual engagement with the surrounding landscape. The susceptibility of this receptor to the proposed development is considered **Low**, due to its the functional nature. The value of the view is also **Low**, with no formal designation or recognised visual amenity. Accordingly, the overall sensitivity of this receptor group is assessed as **Low**.

### Pedestrians of PRoW NS284 / Heron Hill Lane (SCP 1 and 2)

5.5.4 This group comprises pedestrians using Public Right of Way NS284, which follows Heron Hill Lane to the immediate north of the Site. As illustrated in SCP 1 and 2, views from this route are heavily constrained by intervening built form and mature vegetation. Although PRoW users are typically engaged in informal recreation and may have heightened perceptual awareness, the visual experience in this location is restricted and focused along a narrow lane. The susceptibility of these receptors is therefore considered **Medium**, moderated by limited appreciation of the wider landscape context. The value of the view is **Low**, given the absence of scenic designation or visual prominence. The resulting sensitivity is assessed as **Low to Medium**.

### Users of A227 South Street (SCP 2, 3, 7 and 8)

5.5.5 Road users travelling along the A227 South Street experience filtered, fleeting, and oblique views of the Site, as illustrated in SCP 2, 3, 7, and 8. Visibility is significantly limited by roadside vegetation, built form, and boundary fencing, with only occasional glimpses available through gaps in the western

boundary vegetation. These views are typically experienced at speed and from an oblique angle, offering limited visual engagement with the Site. On this basis, the susceptibility of this receptor group to the type of development proposed is assessed as **Low**.

5.5.6 The value of the view is considered **Low to Medium**, as some localised views, particularly in proximity to heritage assets (e.g. SCP 8) may hold limited local importance, though the route primarily serves a functional role for most users. Taking both factors into account, the overall sensitivity of this receptor group is assessed as **Low**

#### **Pedestrians on PRoW NS285 (SCP 4 and 5)**

5.5.7 This receptor group comprises pedestrians using Public Right of Way NS285, which passes through an elevated, wooded ridge to the east of the Site. Outward views from this area are predominantly filtered by dense vegetation, significantly restricting visibility of the Site. However, SCP 4 identifies a single vantage point where a partial, localised view towards the eastern parcel of the Site is obtainable through a break in the tree cover. This view is limited in extent and does not offer sustained exposure to the Site.

5.5.8 Further north along the route, as illustrated in SCP 5, intervening landform and vegetation fully screen the Site from view. Although the right of way passes through a tranquil setting, features typically associated with higher perceptual value, this specific section is not designated and the Site does not form a prominent element in the visual composition. Therefore, on balance, the value of the view is considered as **Low**.

5.5.9 Receptors on this route are engaged in informal outdoor recreation, and their attention is likely to be focused on the surrounding landscape. As such, their susceptibility to the type of development proposed is considered to be **High**. Taking these factors into account, the overall sensitivity of this receptor is assessed as **Medium**.

#### **Pedestrians on PRoW NS265 (SCP 6)**

5.5.10 This receptor group comprises pedestrians using Public Right of Way (PRoW) NS265, which lies to the north-east of the Site. As shown in SCP 6, views towards the Site from this elevated section of the footpath are largely screened by intervening landform and established vegetation. The only visible element associated with the Site is the upper canopy of the central tree belt, which appears faintly on the skyline. The development area itself is not perceptible, and there is no direct or sustained visual relationship with the Site.

5.5.11 While this section of PRoW NS265 is not located within a nationally designated landscape, it lies in close proximity to a listed heritage asset, which may lend a degree of localised value to the surrounding visual environment. Walkers are generally considered to have a higher susceptibility to landscape change due to their recreational engagement and likely attentiveness to views. On this basis, the susceptibility of this receptor group to the type of development proposed is assessed as **High**. The value of the view is considered to be **Medium**, reflecting its locally valued context and the nearby presence of a designated heritage asset. Accordingly, the overall sensitivity of users of PRoW NS265 is assessed as **Medium to High**.

#### **Pedestrians on PRoW NS301/NS271 (SCP 9)**

5.5.12 This receptor group comprises pedestrians along Public Rights of Way NS301 and NS271 to the south-west of the Site. As shown in SCP 9, views towards the Site from this location are screened by intervening vegetation and landform. The Site itself is not perceptible, and there is no direct visual connection to the development area. Although users of these routes may be engaged with the surrounding landscape, the Site forms no appreciable component of the view.

5.5.13 The location is not designated and has no formal cultural or scenic associations. Recreational users are generally considered to have a higher susceptibility to visual change. On balance, the susceptibility of this receptor group is considered to be **High**, and the value of the view is also **Low**. Accordingly, the overall sensitivity of users of PRoW NS301 and NS271 is assessed as **Medium**.

### Users of Rectory Road/ PRoW SD310 (SCP 10)

5.5.14 This receptor group comprises road users and pedestrians using Rectory Road and Public Right of Way (PRoW) SD310, located approximately 1.8 kilometres to the north-west of the Site. As illustrated in Site Context Photograph (SCP) 10, the Site is entirely screened from this location by intervening landform and mature vegetation. There is no visual connection with the Site, either in the immediate foreground or within the wider landscape setting.

5.5.15 This location is not within a designated landscape and has no known cultural or scenic associations. Recreational users are generally considered to have a higher susceptibility to visual change. On the basis of the above, the susceptibility of this receptor group is judged to be **High**, and the value of the view is assessed as **Low**. Accordingly, the overall sensitivity of users of PRoW SD310 and Rectory Road is considered to be **Medium**.

**Table 5.2: Summary of Visual Receptor Sensitivity**

Receptor	Value	Susceptibility	Sensitivity
Residents on South Street & Chapmans Hill	Low	High	<b>Medium</b>
Industrial/ Comm. Users on Heron Hill Lane	Low	Low	<b>Low</b>
Users of PRoW NS284 / Heron Hill Lane	Low	Medium	<b>Low to Medium</b>
Users of A227 South Street	Low Medium	Low	<b>Low</b>
Pedestrians on PRoW NS285	Low	High	<b>Medium</b>
Pedestrians on PRoW NS265	Medium	High	<b>Medium to High</b>
Pedestrians on PRoW NS301/NS271	Low	High	<b>Medium</b>
Users of Rectory Road/ PRoW SD310	Low	High	<b>Medium</b>

## 5.6 Summary

5.6.1 A landscape and visual appraisal was undertaken in May 2025 to assess the existing character, landscape value, and visual sensitivity of the Site and its surroundings. The Site is located within a gently undulating landscape and comprises a series of pastoral fields that are enclosed by mature tree belts, hedgerows and woodland edges. The landscape character across the Site is varied. The western and central areas are more open and influenced by nearby built development, including residential and commercial properties. In contrast, the north-eastern field exhibits a more tranquil and enclosed character, with a stronger sense of rurality. The existing built form within the Site, associated with Blackthorn Farm, comprises low-rise, functional structures of limited architectural interest. These buildings are visually contained by surrounding vegetation and do not contribute significantly to the scenic or aesthetic value of the wider landscape. The established vegetation framework provides a robust structural setting and helps to visually integrate the Site into its surroundings.

5.6.2 The landscape value of the Site is assessed as low. This reflects its generally unremarkable character, lack of scenic or cultural interest, absence of formal landscape designation and limited public access or recreational function. Certain features, such as the mature boundary vegetation and internal woodland belts, are considered to have medium landscape value due to their ecological role and contribution to local character. These features also offer potential to support the successful integration of future development.

- 5.6.3 A range of landscape receptors has been identified, including the Meopham Downs LCA and specific features within the Site such as the agricultural fields, field boundaries and internal tree belts. The overall sensitivity of these receptors to development is assessed as medium, taking into account their landscape value and susceptibility to change.
- 5.6.4 The visual appraisal has confirmed that the visibility of the Site is highly limited due to the presence of surrounding vegetation, variations in landform and nearby built form. Views into the Site are largely restricted to short-range glimpses from the A227 South Street, upper floors of adjacent properties along South Street and Chapmans Hill, and a limited number of public rights of way. Most visual receptors are assessed as having low to medium sensitivity, with occasional instances of medium to high sensitivity where elevated routes or more tranquil settings are present. However, even in these cases, views are often filtered or partial.
- 5.6.5 Overall, the Site is perceived as a visually contained and partially degraded landscape with limited contribution to the wider landscape character. Subject to the retention and reinforcement of existing vegetation, and the implementation of appropriate landscape mitigation, the Site has the capacity to accommodate sensitively designed development without resulting in significant harm to the landscape or visual resource.

## 6 GREEN BELT ASSESSMENT

### 6.1 Overview

6.1.1 This chapter summarises the published Green Belt studies and reports that include the Site and assesses its contribution to the Green Belt purposes outlined in the National Planning Policy Framework (NPPF), following the methodology set out in **Appendix A**.

### 6.2 Published Gravesham Green Belt Studies and Other Relevant Local Policy

#### **Gravesham Local Plan Core Strategy (2014);**

6.2.1 Policy CS02 'Scale and Distribution of Development' states that:

*"...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..."*

6.2.2 The settlement of Culverstone Green is noted as a '**Third Tier Settlement**' within the rural area, inset from the Green Belt. **Paragraph 4.2.6** notes *"these boundaries do not define the full extent of each settlement but relate to a coherent and established built up area where infilling would not adversely affect local character and identity, or impact on the openness of the Green Belt"*.

6.2.3 **Paragraph 4.2.7** notes *"the national aim of the Green Belt is to prevent urban sprawl by keeping land permanently open"* and sets out the following local planning purposes:

- *"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 assist in safeguarding the countryside by minimising the expansion of the Borough's rural settlements; and"*
- *"To assist in concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet."*

6.2.4 **Paragraph 4.2.8** states that:

*"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."*

6.2.5 **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 anti-crime standards...this will be achieved through...*

- *Using the collaborative approach advocated in Building for Life 12 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..."*

### **Emerging Local Plan**

6.2.6 Between April and July 2018, a Regulation 18 Stage 1 consultation was undertaken on **Site Allocations: Issues and Options and Development Management Policies**. Feedback on the Regulation 18 Stage 1 informed the Regulation 18 Stage 2 consultation that ran between October and December 2020. This consultation was split into two parts: part 1 being a partial review of the local plan core strategy and site allocations, with part 2 a draft development management policies document.

6.2.7 A series of supporting documents provided additional evidence to the emerging Local Plan, with those of most relevance to Green Belt matters including:

- Draft Strategic Housing Land Availability Assessment (SHLAA), 2020 Update;
- The Gravesham Stage 2 Green Belt Study and Appendices, August 2020; and
- The Green Belt Background Paper.

6.2.8 The Site is identified as a developable site 'GBS-Q' within the Draft SHLAA (Appendix D(iii)). Under the 'Suitability' section, the SHLAA outlines the following and indicates an approximate yield of 109 dwellings:

*"Suitability: The site is located on the edge of the inset settlement of Culverstone Green. There is no formal access to the site, but there is scope to provide an access from Wrotham Road to the northern section of the site. Access to the southern part of the site would involve the demolition of Marycroft and the loss of priority habitat.*

*The site lies within the Meopham Downs LCA and within an area of medium-high sensitivity. With landscape mitigation, development could be absorbed into the landscape without adverse impacts.*

*The eastern edge of the site boundary abuts ancient woodland and a 15m buffer would be required to minimise harm to the woodland. This would reduce the developable site area. The southern half of the site is an area of priority habitat and development would need to safeguard its biodiversity value. The western part of the site fronting Wrotham Road is grade 3 agricultural land.*

*Overall, the northern part of the site is suitable for development, however the site lies in the Green Belt and this designation would need to change."*

6.2.9 The Site falls within Parcels CG2 and CG3 of the Culverstone Green Area, as identified in the Gravesham Stage 2 Green Belt Study (Figure 5.3: Harm Assessment). Parcel CG2, which comprises the northern part of the Site, is assessed as having 'Moderate-High' harm, while Parcel CG3, covering the south-eastern portion, is assessed as 'Moderate'.

6.2.10 Although Parcels CG2 and CG3 are rated as 'Moderate-High' and 'Moderate' respectively, these scores are considered to overstate the Site's contribution to Green Belt Purpose 3 (safeguarding the countryside from encroachment). It is also notable that other draft allocations have been proposed on land with similar or higher harm ratings. Therefore, the inflated assessment of CG2 and CG3 should not preclude the Site's potential for development, particularly in light of the proposed Tier 3 settlement hierarchy for Culverstone Green.

6.2.11 The Gravesham Stage 2 Green Belt Study further notes that "*release of the parcel as a whole...would result in boundaries that would be clearly defined by Heron Hill Lane to the north, the tree lined track and woodland block with land sloping down to the east and South Street to the west*" and that "*there would be no additional harm resulting from increased containment of adjacent Green Belt land*".

### 6.3 Assessment of the Contribution of the Site to the Green Belt

6.3.1 An assessment of the contribution that the Site makes to the purposes of the Green Belt has been undertaken. This assessment is set out in Table 6.1.

**Table 6.1: Assessment of the Contribution of the Site to the Green Belt**

Purpose	Critique	Contribution
(a) To check the unrestricted sprawl of large built-up areas	Fundamentally Culverstone Green does not constitute a large built-up area, and accordingly the Site extent to which the Site can contribute to this purpose is diminished. As the Site occupies an area of largely open land that lies beyond the defined settlement boundary, its redevelopment will undoubtedly result in a physical extension of the settlement pattern. However, given that this area of land is physically enclosed by additional built development to the north, and which perceptibly defines the settlement edge, the Site's redevelopment would largely be perceived as infill development amidst the existing settlement and not as unmanaged sprawl. Furthermore, the substantial vegetation that encloses the Site will further diminish any perceived sense of sprawl, with any introduced built development within the Site confined to being within these robust physical features.	Weak or None
(b) To prevent nearby towns from merging into one another	Culverstone Green nor Meopham Green are defined as towns, and accordingly the Site extent to which the Site can contribute to this purpose is diminished. The Site is perceived to be physically contained by existing built development to the north, south and west. The built form to the north of the Site, which lies adjacent to Heron Hill Lane and extends westwards along Chapmans Hill, is perceived as defining the northern extent of Culverstone Green despite being washed over by the Green Belt designation. Given the above, the redevelopment of the Site will clearly not physically or perceptually reduce the separation distance between Culverstone Green and Meopham Green (lying a further 1.2km to the north of the perceived settlement limits of Culverstone Green).	None
(c) To assist in safeguarding the countryside from encroachment	The Site lies beyond the settlement limit and in spatial planning terms is defined as countryside, albeit it is not an extensive tract of land. Although there is some built form present within the Site, its overriding land use (consisting of farmland) combined with the sylvan character to its setting ensures that there is an air of rurality over the Site such that it is perceived as forming part of the countryside. Nonetheless, due to the containment of the Site by dense vegetation its' redevelopment will not likely result in an urbanising influence over the surrounding area, although development would inevitably directly alter the fabric of the Site itself.	Moderate

(d) To preserve the setting and special character of historic towns	Culverstone Green, nor the land in its setting (including the Site), does not contribute to nor form the setting or special character of a historic town.	<b>None</b>
(e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	All areas of Green Belt fulfil this purpose equally.	<b>n/a</b>

6.3.2 Overall, the Site does not strongly fulfil the key purposes of the Green Belt. While it contributes moderately to safeguarding the countryside (Purpose c), it makes no contribution to preventing towns merging or preserving historic town settings, and only a weak contribution to preventing urban sprawl.

## 6.4 Assessment against the definition of 'Grey Belt'

6.4.1 As noted, for the purposes of decision making, 'grey belt' is defined as:

*"land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."*

6.4.2 As outlined in Table 6.1, the Site makes no contribution to Purposes (b) and (d), and only a weak contribution to Purpose (a). The Site does not fall within any of the protected categories identified under Footnote 7 of the NPPF and therefore as the Site does not strongly fulfil any of the relevant purposes it qualifies as 'grey belt' land.

## 6.5 Harm to the Green Belt

6.5.1 Development of the Site would not undermine any of the purposes (a-d) of the remaining Green Belt in Gravesham Borough. With reference to **Paragraph 155** of the NPPF "*development in the Green Belt should not be regarded as inappropriate where... 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...*"

6.5.2 To satisfy NPPF **Paragraph 155** for the Proposed Development to not be regarded as inappropriate, it will be necessary to demonstrate that the Site is,

- Grey belt land and that its redevelopment would not fundamentally undermine the purposes (taken together) of the Green Belt across the area of the plan;
- there is demonstrable unmet need for the type of development proposed;
- the Site constitutes a 'sustainable location'; and
- the 'Golden Rules' can be met where applicable.

6.5.3 Concerning (i), the Site is in the Grey Belt and the containment/delineation of settlement provided by Heron Hill Lane to the north, the A227 South Street to the west, and successive bands of ancient woodland to the east, in conjunction with the localised and small-scale nature of the Site, ensures that the Proposed Development cannot undermine the function of the Green Belt across the area of the plan. Consideration of (ii) and (iii) lies beyond the scope of this assessment. In relation to (iv), the Proposed Development can support delivery of affordable housing and improved green infrastructure.

6.5.4 The NPPF states that the key characteristics of the Green Belt are "*their openness and their permanence*". As demonstrated in Table 6.1, the Site is considered to be inherently open due to its agricultural land use. However, it is pertinent that the Site is physically related to the built-up area of Culverstone Green and is perceived to already lie within the confines of this settlement due to the presence of built form aligned to Chapman's Hill and Heron Hill Lane to the north-west of the Site. Therefore, despite the technical reduction in openness that would occur should the Site be developed, this area of land is not actually perceived to form part of the Green Belt.

6.5.5 The existing Green Belt boundary is somewhat ambiguous on the ground, as while it is in part defined by the area of woodland to the south of the Site, the Green Belt boundary abruptly terminates at the interface between two residences lining the A227 South Street. This means that built development either side of the A227 South Street, north of the defined settlement boundary, is 'washed-over' by the Green Belt designation (including the built form lining Chapman's Hill and Heron Hill Lane).

6.5.6 Given the above and the way in which the settlement pattern has evolved over time, development of the Site offers the potential to consolidate the settlement pattern.

6.5.7 Should the Site be developed as per the principles set out in Section 7 of this report, the openness of the remaining designated area would remain intact given the exceptionally limited visual envelope of the Site and that it is already perceived as forming part of the existing settlement pattern of Culverstone Green. On this basis, development of the Site would not compromise the purposes and function of the remaining Green Belt.

## 6.6 Summary

6.6.1 This chapter has assessed the Site's contribution to the Green Belt in the context of national and local policy, including the NPPF and supporting Gravesham evidence base. The Site lies within the Green Belt but has been assessed as forming part of the 'grey belt - land that does not strongly fulfil the Green Belt purposes set out in the NPPF with no restrictions as set out under footnote 7 applying to the Site.

6.6.2 The assessment demonstrates that the Site makes:

- **Weak contribution** to Purpose (a) (to check unrestricted sprawl), being well contained by existing development and defined physical features;
- **No contribution** to Purpose (b) (to prevent merging of towns), as the Site lies within the perceived settlement of Culverstone Green and does not reduce separation from Meopham Green;
- **Moderate contribution** to Purpose (c) (to safeguard the countryside), due to its farmland use and character, though containment by vegetation limits wider encroachment;
- **No contribution** to Purpose (d) (to preserve historic town settings); and
- Purpose (e) is acknowledged as uniformly applicable across all Green Belt land.

6.6.3 Although Gravesham Borough Council's Stage 2 Green Belt Review assessed the Site's northern and southern parts as causing 'Moderate' to 'Moderate-High' overall harm, this appraisal finds the actual contribution to Green Belt purposes is more limited, given the Site's strong physical containment and visual relationship to Culverstone Green.

6.6.4 In accordance with **Paragraph 155** of the NPPF, development on grey belt land is not considered inappropriate if it does not undermine the Green Belt's wider purposes (alongside other criteria). The Proposed Development will:

- Utilise grey belt land;
- Not result in significant harm to Green Belt purposes when considered at a strategic scale;

- Be visually contained and perceived as part of the existing settlement; and
- Provide public benefits such as affordable housing and enhanced green infrastructure.

6.6.5 While development of the Site would lead to a definitional reduction in openness, it would not materially affect the perception or strategic function of the Green Belt. The Site benefits from strong physical and visual containment. Development would not result in harm that outweighs the benefits, provided it is brought forward through an appropriately landscape-led design and integrated sensitively with its surroundings.

6.6.6 Development would utilise Grey Belt land, following the sequential approach set out in **Paragraph 148**, and would not undermine the Green Belt's strategic purposes when considered across the plan area, as required by **Paragraph 155**. Furthermore, development of the Site will align with national policy by promoting sustainable patterns of development, focusing growth in the vicinity of an existing settlement that is visually contained, while maintaining the openness and permanence of the wider Green Belt. The Site's development would deliver notable public benefits, including the provision of affordable housing and enhanced green infrastructure, including opening up part of the Site to community recreational access, fully in accordance with the wider planning objectives of the NPPF, while preserving the integrity and function of the Green Belt across Gravesham Borough.

## 7 DESIGN RATIONALE AND LANDSCAPE STRATEGY

### 7.1 Overview

7.1.1 From a landscape and visual perspective, the Site presents a strong opportunity for sensitively planned residential development. It benefits from a high level of visual containment, provided by mature and continuous boundary vegetation, and is physically and perceptually connected to the existing settlement pattern of Culverstone Green. Built form already extends northward to Chapmans Hill and Heron Hill Lane, which visually define the northern edge of the settlement. The A227 South Street and built development to the south and west further reinforce a sense of enclosure.

7.1.2 Nonetheless, any future development must respond appropriately to the Site's landscape context and visual sensitivities. Key to this is the retention and enhancement of the boundary vegetation, which provides visual screening, reinforces character, and contributes to biodiversity. The easternmost parcel of the Site is more exposed due to its elevated position and proximity to ancient woodland. The *Gravesend Greenfield and Green Belt Site Assessments and Options Consultation (2020)* identifies that the western plateau part of the Site is less sensitive to development in landscape terms.

7.1.3 The Landscape and Visual Appraisal, alongside the Green Belt Assessment, identifies the opportunities and constraints to be considered in the potential development of the Site. These are illustrated **on Figure 6: Landscape Opportunities and Constraints Plan**.

### 7.2 Site Opportunities and Constraints

7.2.1 The Site presents several landscape-related opportunities and constraints that should shape any future development proposals, as illustrated in **Figure 6: Landscape and Visual Opportunities and Constraints Plan**.

#### Opportunities:

- The Site is not subject to any statutory or non-statutory landscape designations;
- There are no Tree Preservation Orders (TPOs) enforced within the Site;
- It is not crossed by any PRoW and currently lacks public access or recreational function;
- It is strongly enclosed by mature vegetation, limiting visibility and providing a defined landscape framework;
- The adjacent built form to the north, west and south provides context for settlement extension and reinforces a defensible urban edge; and
- There is potential to integrate new green infrastructure, reinforce landscape structure and deliver biodiversity net gain.

#### Constraints:

- The eastern field is visually sensitive, due to its elevation, openness and proximity to Willow Wood (ancient woodland), and should remain undeveloped;
- A minimum 15m buffer is required along the eastern boundary to protect the ancient woodland;
- Built form must be offset from the Root Protection Areas (RPAs) of trees and hedgerows within and along the Site boundary;

- The internal landscape structure is fragmented, particularly the central tree belt, and could be enhanced through new planting measures; and
- Development should respond carefully to the existing settlement pattern, to ensure that new built form is integrated rather than visually or spatially isolated.

### 7.3 Response to Landscape Character

7.3.1 The development of the Site provides the opportunity to respond positively to landscape character at national, county and local levels.

- At a national scale, the proposals support the objectives of the **North Downs National Character Area (NCA 119)**, particularly through the conservation of wooded landscape features and reinforcement of historic field patterns;
- At the county level, development would align with the **Ash Downs LCA**, retaining the landscape structure, woodland edges, and reinforcing enclosure; and
- At the local level, proposals can reflect and enhance the characteristics of the **Meopham Downs LCA**, including hedgerow networks, and local vernacular form and materials.

7.3.2 The Site's enclosed and partially degraded character lends itself to development that reinforces existing boundaries and enhances landscape structure, while avoiding development in the most sensitive areas, particularly the eastern field.

### 7.4 Response to Planning Policy

7.4.1 The proposals have potential to meet the landscape and design objectives of:

- **The National Planning Policy Framework (2024)**, including the protection of landscape character, enhancement of green infrastructure, and high-quality design;
- **Gravesend Core Strategy (2014)**, including Policies CS01 (Sustainable Development), CS12 (Green Infrastructure), and CS19 (Development and Design Principles);
- **Design for Gravesend Design Code SPD (2024)**, which promotes conservation of existing landscape assets, integration of green and blue infrastructure, biodiversity net gain, and locally responsive built form; and
- **The Kent Design Guide (2005)**, which advocates contextual design and sensitive landscape integration.

7.4.2 The retention of existing landscape features, use of local materials, and delivery of multifunctional green infrastructure can ensure that new development contributes positively to Culverstone Green's landscape setting and visual character.

### 7.5 Design Recommendations and Principles

7.5.1 The landscape strategy has been informed by the findings of the landscape and visual appraisal (Sections 4 and 5) and the Green Belt assessment (Section 6), and reflects the opportunities and constraints identified in **Figure 6: Landscape and Visual Opportunities and Constraints Plan** and the design intent in **Figure 7: Illustrative Landscape Masterplan**.

7.5.2 These recommendations support a landscape-led approach that ensures the Site can accommodate development sensitively, maintain visual containment, and avoid harm to the strategic role and openness of the wider Green Belt.

7.5.3 The following principles should guide the development:

## Boundary Containment and Vegetation Framework

- **Retain and strengthen existing boundary vegetation**, particularly to the north, south, and east, to reinforce containment, contribute to character, and support biodiversity;
- **Respect Root Protection Areas (RPAs)** of retained trees and hedgerows, with appropriate setbacks informed by arboricultural advice; and
- **Maintain a minimum 15-metre undeveloped buffer** along the eastern boundary to protect the adjacent ancient woodland (Willow Wood), in line with Natural England guidance.

## Sensitive Layout and Zoning

- **Avoid built development within the eastern field**, which is visually exposed and sensitive due to its proximity to ancient woodland and its role in defining the wooded settlement edge;
- **Focus development within the western and central parts** of the Site, where enclosure and visual containment are stronger and landscape sensitivity is lower; and
- **Ensure a gradual transition** between built form and the wider landscape through planting and varied layout to avoid hard development edges.

## Structural Planting and Landscape Integration

- **Introduce new structural planting** along internal routes and Site edges, especially the A227 frontage, using native woodland blocks, hedgerows and trees to break up built form and reinforce the character of the area;
- **Reinstate and enhance internal hedgerows**, particularly those aligned with historic field patterns, to support legibility and local distinctiveness; and
- **Use planted corridors and green buffers** to provide structure, separate development parcels, and soften built form in views.

## Open Space and Green Infrastructure

- **Deliver a connected network of green infrastructure**, including naturalistic open space, ecological corridors, and accessible routes that support biodiversity and visual softening;
- **Integrate SuDS features** such as swales and basins as landscape elements, contributing to character and function; and
- **Reflect local landform and character** in the design of open spaces, using native planting and subtle grading.

## Built Form and Settlement Character

- **Reflect local vernacular architecture**, using appropriate materials (e.g. red brick, clay tiles, timber), scale, and detailing;
- **Create a clear and well-integrated gateway** along the A227, using structural planting and sensitive built form to define the settlement edge; and
- **Adopt a varied and informal layout**, with appropriate setbacks, green edges and boundary treatments, consistent with the wooded context of Culverstone Green while creating a pedestrian-friendly environment.

7.5.4 These principles provide a structured response to the Site's landscape setting and visual sensitivities. They ensure the development:

- Respects the existing landscape structure;
- Is visually contained and appropriately sited;
- Retains the open character of the eastern parcel; and
- Reinforces the sense of place and local identity.

7.5.5 As set out in **Section 6**, while development would reduce openness in a definitional sense, it would not undermine the Green Belt's strategic purpose or lead to unacceptable encroachment. The proposed landscape approach supports this conclusion, providing strong containment and ensuring the development is integrated, characterful, and policy-compliant.

## 7.6 Summary

7.6.1 The Site presents a suitable opportunity for landscape-led residential development, benefiting from strong visual containment, proximity to existing built form, and a coherent relationship with the settlement pattern of Culverstone Green. The design strategy has been informed by the Site's landscape and visual characteristics, as well as its location within the Green Belt.

7.6.2 Key opportunities include the absence of statutory designations, a well-defined vegetation framework, limited public access, and low overall landscape value and sensitivity. Constraints include the visually sensitive eastern field, proximity to ancient woodland, and fragmented internal landscape structure.

7.6.3 The proposed design approach responds positively to local and national landscape character, planning policy, and Green Belt objectives. Development is focused within the western and central parts of the Site, avoiding the eastern field, with structural planting and green infrastructure used to integrate built form, enhance biodiversity, and soften visual effects.

7.6.4 Design principles include retention and enhancement of boundary vegetation, reinforcement of internal green structure, careful siting of development, and the use of materials and layouts that reflect the prevailing vernacular. A 15-metre undeveloped buffer is provided adjacent to Willow Wood to protect ancient woodland.

## 8 ASSESSMENT OF EFFECTS

### 8.1 Overview

8.1.1 This section sets out the anticipated landscape and visual effects resulting from the Proposed Development at 'Year 1', once the Proposed Development has been completed during winter conditions, and at 'Year 15' during summer conditions to take into account the ongoing establishment of the planting proposals in accordance with the Illustrative Landscape Masterplan (Figure 7).

8.1.2 Landscape and visual effects are related subject areas but assessed separately. Landscape effects derive from changes in the natural and built environments which may give rise to changes in their fabric, character, and quality and how these are experienced. Visual effects relate to the changes that arise in the composition of available views as a result of a development proposal (please refer to **Appendix A**).

8.1.3 Effects on landscape character and visual amenity can arise from many causes, for example, perceived changes to:

- the scale, grain, and pattern of the landscape, for example engineered landform or out of context planting or changes to land cover;
- deterioration or erosion of the landscape by the urbanising effects of traffic, hard surfacing, structures and built development, lighting and signs and associated loss of tranquillity; and
- views or loss of views between surrounding locations and introduced development.
- The anticipated landscape and visual effects resulting from the Proposed Development are based on the Parameters Plan (Dwg. No. 23357B/12) prepared by Clague Architects, the Design and Access Statement and Figure 7: Illustrative Landscape Masterplan.

### 8.2 Landscape Effects

8.2.1 Landscape value is defined by GLVIA3 as being:

*"The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of different reasons".*

8.2.2 Whilst the NPPF does not define 'valued landscapes', it is acknowledged and established by case law, that value is not merely something that is designated either by statute, such as an Area of Outstanding Natural Beauty (National Landscape), or non-statutory process. The Site is not considered to be a 'valued landscape' in and of itself, it is not considered to demonstrate any particular 'intrinsic' value. To better assess the landscape value of the Site and its surroundings, the assessment follows recent guidance set out in TGN 02/21 issued by the Landscape Institute.

8.2.3 Landscape susceptibility is defined by GLVIA3 as:

*"The ability of a defined landscape or visual receptors to accommodate the specific Proposed Development without undue negative consequences."*

8.2.4 Landscape effects are considered in terms of:

- Sensitivity of the receptor based on judgements about:
  - the value attached to the receptor; and
  - the susceptibility of the receptor to the type of change arising from the specific proposals;

- Magnitude of the effect based on judgements about:
  - the size and scale of the effect;
  - the geographical extent of the area that would be affected; and
  - the duration of the effect and its reversibility.

8.2.5 A description of the assessed sensitivities and magnitudes of effect, along with final conclusions on significance of landscape effect can be found below.

### Effects on Local Character Area: Meopham Down LCA

8.2.6 The Meopham Downs LCA is assessed as having Medium value and Medium susceptibility, giving it a **Medium sensitivity** to the type of Proposed Development.

8.2.7 **Year 1:** At Year 1, the Parameters Plan illustrates a transition from pastoral land to residential development within the western parcel of the Site. Although the scale of change is relatively modest in the context of the wider LCA, the introduction of built form, road infrastructure, and access points introduces a discernible change in local character. The permanent loss of a pastoral field and the establishment of a built settlement edge alters the existing land use and visual condition at this interface. The effect is partly offset by the retention and proposed enhancement of existing boundary vegetation, which will begin to soften the visual transition between the development and the adjoining landscape. Importantly, the wider Meopham Downs LCA remains largely unaffected, with the Site contained by its proximity to South Street and the built edge of Culverstone Green. As such, the character impact is spatially limited, and the magnitude of effect is assessed as Small, resulting in a **Minor Adverse** significance of effect.

8.2.8 **Year 15:** By Year 15, the Illustrative Masterplan demonstrates that the development will have matured into a well-integrated extension of the settlement. Reinforced boundary planting and the provision of green infrastructure will visually soften and structurally contain the built form, reducing the perceptual influence of development on the surrounding landscape. The orientation of dwellings, strategic use of open space, and alignment with the settlement grain contribute to a development that is both visually and functionally consistent with local character. Experientially, the softened edges and layered vegetation will improve the quality of views and reduce the sense of encroachment. As identified in the baseline, this LCA can accommodate some development, provided it aligns with the historic field pattern and reinforces characteristic elements such as hedgerows and woodland. The Illustrative Masterplan achieves this, and therefore, the magnitude of effect remains Small. However, the quality of integration and positive response to landscape context results in a **Negligible Adverse** significance of effect overall.

### Effects on Agricultural Fields

8.2.9 The baseline assessment determined that the Agricultural Fields have a Low value and a High susceptibility to the type of development proposed, leading to a **Medium sensitivity** to the Proposed Development.

8.2.10 **Year 1:** At Year 1, the western parcel of the Site will undergo a marked transformation from pastoral land to a residential environment. The Parameters Plan illustrates that much of the existing field pattern will be replaced by new streets, housing plots, and associated infrastructure. While topographic changes are anticipated to be minimal, the loss of traditional land use and the associated sense of openness will be notable. The agricultural fields currently contribute to the Site's character, and their removal constitutes a substantial alteration. The magnitude of effect is therefore considered Large, leading to a **Moderate Adverse** significance of effect.

8.2.11 **Year 15:** By Year 15, the development will be defined by maturing vegetation, structured street layouts, and the establishment of new neighbourhood character. Although the agricultural use will not be restored, the experiential qualities of the landscape will have evolved, offering enclosed, accessible spaces with ecological and recreational value. The eastern parcel, retained as open space and

incorporating SuDS, will enhance the Site's diversity and legibility, providing a degree of spatial and visual relief. Nevertheless, the original land use will have been permanently lost. Despite the enhanced experiential quality, the magnitude of effect remains Large due to the irreversibility of this loss, and the significance of effect is assessed as **Moderate Adverse**.

### Effects on Field Boundaries

8.2.12 Field boundaries within the Site, comprising hedgerows, tree belts, and post-and-rail fencing, are assessed as having Medium value and Medium susceptibility, giving rise to **Medium sensitivity**.

8.2.13 **Year 1:** At the outset, many existing boundaries are proposed to be retained, as indicated in the Parameters Plan. However, several sections, particularly along the western edge where access from South Street is introduced, will be removed or interrupted. The retention of remaining field boundaries reflects an intent to maintain landscape grain, yet the immediate character will be weakened due to fragmentation. Accordingly, the magnitude of effect is assessed as Small, leading to a **Minor Adverse** significance of effect.

8.2.14 **Year 15:** By Year 15, the Illustrative Masterplan shows that field boundaries will have been structurally reinforced through mature hedgerows and tree lines, contributing to ecological networks and visual enclosure. These landscape features will frame development, separate parcels of built form, and define the relationship between open space and settlement edges. While no longer serving an agricultural function, the boundaries will perform an essential role in enhancing legibility, biodiversity, and visual containment. In particular, new planting in the eastern parcel and at internal divisions will restore a pattern reminiscent of traditional field structure. As a result, the magnitude of effect is assessed as Medium, resulting in a **Minor Beneficial** effect.

### Effects on Woodland and Tree Belt within the Site

8.2.15 The internal tree belt and woodland block are assessed as having Medium value and Medium susceptibility, resulting in **Medium sensitivity**.

8.2.16 **Year 1:** The Parameters Plan indicates that the larger woodland block separating the two parcels of the Site will be retained. However, the central east-west tree belt within the western parcel is proposed for removal due to poor condition. This loss will result in reduced internal screening, a diminished tree canopy, and a temporary decline in biodiversity. While the retained woodland will continue to provide some visual structure and ecological value, the magnitude of effect is considered Large, resulting in a **Moderate Adverse** significance of effect.

8.2.17 **Year 15:** By Year 15, new tree planting throughout the Site will have matured, particularly within green corridors, open spaces, and along residential streets. These new elements will compensate for the earlier loss of the central tree belt and contribute to the establishment of a cohesive vegetative framework. This maturing structure will enhance visual and sensory experience, support local biodiversity, and introduce microclimatic benefits. The woodland retained between the two development parcels will be actively managed, further increasing its ecological and visual value. On balance, these improvements contribute positively to the overall landscape character, and the magnitude of effect is assessed as Medium, resulting in a **Minor Beneficial** significance of effect.

### Effects on Built Form within the Site

8.2.18 The existing structures associated with Blackthorn Farm -- comprising barns, sheds, and mobile units are functional and utilitarian, with no architectural merit, heritage interest, or cultural association. These features are visually contained and make little positive contribution to the wider landscape. As such, they are assessed as having Low value but High susceptibility to removal or redevelopment, resulting in an overall **Medium sensitivity** to the Proposed Development.

8.2.19 **Year 1:** Upon completion, new residential development will occupy the former Blackthorn Farm footprint as represented on the Parameters Plan. Although the land use and visual form will be markedly different, the design proposes a higher-quality built environment. With the proposal of development in the western parcel of the Site, the visual enclosure and amenity provision of the Site will also be changed. The

change remains notable but given the uplift in terms of the use and provision of the built form, the magnitude of effect is assessed as Large, resulting in a **Moderate Adverse** significance of effect.

8.2.20 **Year 15:** By Year 15, the built form will be visually integrated within the broader green infrastructure strategy. Layouts will promote coherence through consistent orientation, enclosed streets, and vegetated public spaces. The inward-facing development will be softened by perimeter planting, rear gardens closer to the Site boundary and therefore, the former utilitarian footprint will be replaced by a residential environment that reflects the scale and rhythm of Culverstone Green. These improvements in experiential and perceptual qualities justify a magnitude of effect of Medium, with a significance of effect assessed as **Moderate Beneficial**.

### Effects on the Character of the Site

8.2.21 The overall Site character is assessed as having Low value and Medium susceptibility, giving rise to a **Low-Medium sensitivity** to the Proposed Development.

8.2.22 **Year 1:** At Year 1, the Parameters Plan indicates a distinct and measurable transformation of the Site's character, particularly in the western parcel through the introduction of development including residential built form, roads, new access from South Street, and landscaping. Approximately half the Site will undergo a transition from pasture to development platform. This change will result in the loss of much of the agricultural field pattern and internal tree belt, fundamentally altering both the physical composition and perceptual experience of the Site. The change is most apparent from the western and northern approaches, where built form will replace the prevailing openness and agricultural simplicity of the Site. The loss of internal vegetative features, including the east-west tree belt, reduces the layering of enclosure and diminishes biodiversity value in the short term. Experientially, users of South Street and nearby residents will perceive a difference in character, with construction-stage activity and limited mitigation exacerbating the impact. Though the Site has capacity to accommodate change due to its containment and mixed baseline condition, the physical removal of existing features and the visual dominance of emerging built form results in a Medium magnitude of effect, and a **Moderate Adverse** significance of effect.

8.2.23 **Year 15:** By Year 15, the Illustrative Landscape Masterplan demonstrates a notable redefinition of Site character, guided by a robust green infrastructure framework. Built form will be structurally contained by mature boundary planting and internal green corridors, with tree-lined streets, pocket spaces, and integrated SuDS features collectively shaping a cohesive and legible character. The entire eastern parcel of the Site will function as multifunctional green space, ensuring that open space, biodiversity gains, and visual permeability are embedded in the layout. The transformation from a pastoral field to a suburban-edge neighbourhood is permanent but tempered by qualitative improvements. These include visual softening of built edges, stronger enclosure through native vegetation, and a perceptual shift from fragmented farmland to a planned, ecologically sensitive place. The character will read as a settlement extension, visually compatible with Culverstone Green, but differentiated through landscape quality and spatial rhythm. Importantly, experiential qualities such as enclosure, shade, seasonal interest, and visual layering will be enhanced for local residents and users of adjacent public routes. While the open pastoral function is lost, the resulting environment is diverse, accessible, and environmentally enriched. These improvements offset the loss of former landscape function and re-anchor the Site as part of a wider settlement character. Accordingly, the magnitude of effect remains Medium, but the resultant significance of effect is assessed as **Moderate Beneficial**.

## 8.3 Visual Effects

8.3.1 The assessment of visual effects considers the impact that the Proposed Development will have on the visual amenity of the visual receptors at the identified key views. The locations of the key views are illustrated at Figure 5. These are not intended to be an exhaustive list of the visual effects that will arise but rather are intended to be representative of the viewing experience in the vicinity of the Site and surrounding area.

8.3.2 The selected viewpoint locations have been guided by the Zone of Theoretical Visibility (ZTV) modelling undertaken and field survey. The ZTV illustrates the maximum potential visual envelope of the Proposed

Development, in other words the widest area in the surrounding landscape from where the Proposed Development is potentially visible.

### Effects on Residents on A227 South Street and Chapmans Hill – SCP 2 and 7

8.3.3 This receptor group comprises residents of properties immediately adjoining the northern and north-western boundaries of the Site. As shown in SCP 2 and SCP 7, views into the Site are generally filtered or obscured by a combination of mature vegetation, fencing, and intervening built form, including Hope Cottages and adjacent industrial buildings. Some upper-storey or oblique views toward the Site may be available from rear elevations. The visual baseline assessment determined the sensitivity of this receptor to the type of development proposed as **Medium**.

8.3.4 SCP 2 and SCP 7 provide representative views from the A227 South Street corridor looking east toward the Site. Although no private properties were accessed, these views approximate potential visibility from residences located along the Site's western and north-western edges. Many of these properties are set back from the road and have private boundaries with mature vegetation. As such, it is assumed that most residents will have filtered or screened views from ground level and potentially more open but partial visibility from upper-storey windows.

8.3.5 **Year 1:** At Year 1, the western parcel of the Site as identified in the Parameters Plan is proposed for residential development, including access roads and associated landscape infrastructure. This parcel lies in relatively close proximity to properties along South Street and Chapmans Hill. As illustrated in SCP 2 and SCP 7, views from ground level remain heavily filtered or screened by intervening vegetation, fencing, and built form. However, from upper-storey windows, filtered or partial visibility into the Site may occur, particularly where the proposed built form extends towards the Site's northern and north-western boundaries. While existing vegetation will mitigate some views, the introduction of rooftops, built form, and vehicular movement is likely to represent a perceptible change within the skyline or previously vegetated backdrop. On this basis, the magnitude of effect is assessed as Medium, resulting in a **Moderate Adverse** significance of effect at Year 1.

8.3.6 **Year 15:** By Year 15, the landscape framework set out in the Illustrative Landscape Masterplan will have become established within the western parcel. The layout positions new dwellings inward-facing and set back from existing boundaries, with generous green corridors, buffer planting, and retained vegetation separating them from adjacent residential properties. Proposed planting—including reinforced hedgerows and native tree belts—is anticipated to mature to heights of 5.5 to 9.5 metres, thereby providing substantial screening, particularly in summer months. Filtered glimpses of rooftops or upper-storey elements may remain visible from first-floor windows. However, the combination of setback, inward-facing built form, and mature planting will significantly reduce the development's visual prominence. Accordingly, the magnitude of effect is judged to be Small, and the significance of effect is assessed as **Minor Adverse**, on a worst-case basis accounting for upper-level visibility.

### Effects on Industrial/ Commercial Users on Heron Hill Lane / PRoW NS284 (SCP 1)

8.3.7 As shown in SCP 1, views toward the Site from this receptor group are fully screened at ground level by existing industrial premises and boundary fencing. These receptors comprising employees or users of adjacent commercial and industrial units, typically have a functional relationship with the area and a low expectation of visual amenity. The visual baseline assessment determined the sensitivity of this receptor to the type of development proposed as **Low**.

8.3.8 **Year 1:** This receptor group includes employees and visitors to commercial and industrial premises immediately adjoining the Site's northern boundary. As shown in SCP 1, views towards the Site are largely obstructed by intervening built form and fencing. However, the Parameters Plan identifies the western parcel of the Site as developable, including internal roads, housing, and associated landscape infrastructure. As such, there may be limited and oblique views of upper storeys of the proposed development from certain elevated locations within the premises. Nevertheless, given the low visual expectations of these receptors and the functional character of their environment, the magnitude of visual change is assessed as Very Small, resulting in a **Neutral** significance of effect.

8.3.9 **Year 15:** By Year 15, the proposed boundary planting, as set out in the Illustrative Landscape Masterplan, will have matured and further reinforced the existing sense of visual enclosure along Heron Hill Lane. The Site is already well screened from this receptor group by a combination of intervening industrial and residential buildings, high fencing, and established vegetation along the northern boundary. The proposed built form will be set back from the northern edge of the Site and oriented inward, with boundary treatments and rear gardens forming a buffer between development and these receptors. As a result, any potential visibility of built form will be either removed or substantially filtered. While there may be glimpses of maturing planting or green infrastructure over time, these would represent a neutral or potentially positive contribution to local character rather than a visual intrusion. Given the low sensitivity of industrial/commercial users and the minimal anticipated change in the view, the magnitude of effect is assessed as Very Small, and the residual significance of effect is **Neutral**.

#### **Effects on Pedestrians of PRoW NS284 / Heron Hill Lane (SCP 1 and 2)**

8.3.10 This receptor group comprises pedestrians using PRoW NS284, which follows Heron Hill Lane immediately to the north of the Site. As shown in SCP1 and SCP 2, views from this route are predominantly restricted by mature vegetation, fencing, and adjacent built form. The footpath has a strongly enclosed, linear character with only limited and fleeting opportunities to view the Site through breaks in vegetation, particularly near its western extent where Heron Hill Lane terminates. The visual baseline assessment determined the sensitivity of this receptor to the type of development proposed as **Low to Medium**.

8.3.11 **Year 1:** At Year 1, this PRoW remains visually enclosed due to the presence of industrial and residential buildings, fencing, and established vegetation along the Site's northern boundary. The Parameters Plan indicates that development will be located within the western parcel, with existing boundary vegetation retained. While much of the Site is screened from view, there may be limited filtered glimpses of rooftops or upper-storey elements at the western extent of the footpath, where enclosure is less complete. Although these receptors are assessed to have sensitivity as Low to Medium, given the minimal degree of change, the magnitude of effect is Very Small, resulting in a **Negligible Adverse** significance of effect.

8.3.12 **Year 15:** By Year 15, the proposed boundary planting, as set out in the Illustrative Landscape Masterplan, will have matured, reinforcing the strong sense of visual enclosure that already characterises this section of the PRoW. The Site is currently well enclosed from Heron Hill Lane by a combination of existing built form (industrial and residential) and established vegetation along the northern boundary. The Masterplan indicates that the proposed built form will be set back from the northern edge of the Site and oriented inward, with rear gardens or boundary treatments positioned between the development and the PRoW. This layout and orientation minimise the potential for visual intrusion from the built form. As a result of the combined effect of retained vegetation, maturing planting, and the inward-facing layout of the built form, any significant views of built form PRoW NS284 will be removed or substantially filtered, however there maybe views of the proposed planting. The magnitude of effect is assessed as Very Small, and the significance of effect is **Neutral**.

#### **Effects on Users of A227 South Street - SCP 2, 3, 7, and 8**

8.3.13 South Street (A227) forms the western boundary of the Site. As illustrated in SCP 2, 3, 7, and 8, views toward the Site are filtered by a combination of roadside vegetation, boundary fencing, and adjacent built form. Glimpsed views are possible through breaks in vegetation and field access points. The visual baseline assessment determined the sensitivity of this receptor to the type of development proposed as **Low**.

8.3.14 **Year 1:** This receptor group includes motorists, cyclists, and pedestrians travelling along South Street. According to the Parameters Plan, the western parcel, which fronts the road, will accommodate new residential development, access roads, and associated green infrastructure. As established in the baseline assessment, views from South Street are typically glimpsed and oblique, due to the alignment of the road, intervening vegetation, and the enclosed nature of the Site. Although retained hedgerows provide some screening, intermittent views of built form and activity will be possible, particularly through new access points and during winter months when vegetation is less dense. Given the Low sensitivity of this receptor and the modest degree of visual change, the magnitude of effect is assessed as Small, resulting in a **Negligible Adverse** significance of effect.

8.3.15 **Year 15:** By Year 15, the western frontage will be enhanced through the establishment of hedgerows, street trees, and open space, as set out in the Illustrative Landscape Masterplan. Residential dwellings will be set back, with rear gardens located closer to the Site boundary and framed by a maturing landscape structure. As vegetation matures, views of the built form will be increasingly filtered, and the visual prominence of development reduced. Built elements will appear visually subordinate to the surrounding landscape framework. The magnitude of effect is Small, and due to the improvement in visual character and enhancement of townscape qualities, the significance of effect is assessed as **Minor Beneficial**.

#### **Effects on Pedestrians on PRoW NS285 - SCP 4 and 5**

8.3.16 This footpath (PRoW NS285) runs along an elevated, wooded ridge to the east and north-east of the Site. As illustrated in SCP 4 and SCP 5, views toward the Site are largely screened by dense, mature woodland. A single break in the vegetation, captured in SCP 4, provides a partial, elevated view toward the eastern parcel of the Site, although intervening vegetation remains the dominant element within the view. The visual baseline assessment determined the sensitivity of this receptor to the type of development proposed as **Medium**.

8.3.17 **Year 1:** At Year 1, views from this elevated footpath remain heavily filtered by mature woodland, with only one minor break in the canopy allowing a glimpse of the eastern parcel. As set out in the Parameters Plan, the eastern parcel is not intended for built development and is instead allocated as open space. The existing woodland belt running north to south through the Site will be retained, continuing to screen views of the western parcel, which forms the developable area. Consequently, no built form will be introduced into the view upon completion. Given the Medium sensitivity of this receptor and the absence of perceptible change to the current view, the magnitude of effect is assessed as Very Small, resulting in a **Neutral** significance of effect.

8.3.18 **Year 15:** By Year 15, the Illustrative Landscape Masterplan proposes a publicly accessible open space within the eastern parcel, incorporating naturalistic SuDS features, pedestrian paths, and native planting. These enhancements will reinforce the vegetated setting and retain the open character visible from the footpath. The open space will be perceived as compatible with the existing woodland context. No built form will be introduced into the view, and any visibility will be of green infrastructure rather than development. The magnitude of effect remains Very Small, and the residual significance of effect is **Neutral**.

#### **Effects on Pedestrians on PRoW NS265 - SCP 6**

8.3.19 Located over 1 kilometre to the north-east of the Site, this elevated section of PRoW NS265 offers expansive, long-range views across the landscape, as illustrated in SCP 6. The development area itself is not visible; only the upper canopy of the central tree belt within the Site is faintly discernible on the skyline. The visual baseline assessment concluded that the value of the view is Medium, reflecting the nature and outlook of the existing views, recreational use, and proximity to a listed heritage asset. The visual baseline assessment determined the sensitivity of this receptor to the type of development proposed as **Medium to High**.

8.3.20 **Year 1:** At Year 1, the PRoW continues to provide broad panoramic views across the wider landscape, although visibility of the Site remains limited. As shown in SCP 6, only a faint outline of the upper tree canopy is discernible on the skyline. The Parameters Plan identifies the western parcel as the developable area, with removal of the central tree belt. However, due to the screening effect of landform and intervening vegetation, no significant built form will be visible from this location. Any glimpses of development in place of the former canopy are anticipated to be faint and filtered. The eastern parcel is retained as open space and will remain free from built development, thereby preserving the open skyline. Given the receptor's Medium to High sensitivity, and the Very Small magnitude of effect associated with subtle vegetation clearance and limited perceptibility of early-stage built form, the significance of effect is assessed as **Negligible Adverse**.

8.3.21 **Year 15:** By Year 15, proposed structural planting across both parcels will have matured, providing additional screening of built form within the western parcel and reinforcing the wooded skyline. The orientation and arrangement of development have been designed to reduce massing and minimise any

potential visual intrusion within distant views. As a result, the Site is anticipated to remain visually indistinct from this section of PRoW NS265. The magnitude of effect remains Very Small, and with no appreciable change to the existing view, the significance of effect is assessed as **Neutral**.

### Effects on Pedestrians on PRoW NS301/NS271 - SCP 9

8.3.22 These routes comprising PRoW NS301 and NS271 are located to the south-west of the Site. As illustrated in SCP 9, views towards the Site are entirely screened by a combination of intervening landform, mature vegetation, and built form. The visual baseline assessment determined the sensitivity of this receptor to the type of development proposed as **Medium**.

8.3.23 **Year 1 and Year 15:** On completion and in the long term, the Site will remain visually contained and completely screened from these routes. No elements of built form, infrastructure, or movement will be perceptible, and the view will remain unchanged. The magnitude of effect is assessed as None, and the significance of effect is therefore **Neutral**.

### Effects on Users of Rectory Road/PRoW SD310 - SCP 10

8.3.24 Located approximately 1.8km to the north-west of the Site, this receptor group comprising users of Rectory Road and PRoW SD310 has no meaningful visual connection to the Site. As confirmed by SCP 10, views are fully screened by intervening landform and mature vegetation. The visual baseline assessment determined the sensitivity of this receptor to the type of development proposed as **Medium**.

8.3.25 **Year 1 and Year 15:** On completion and in the long term, the Site will remain entirely screened from this receptor group. No views of built form, infrastructure, or associated activity will be available at any stage due to visual containment of the Site. There will be no change in the composition or character of the existing view. The magnitude of effect is None, and the significance of effect is assessed as **Neutral**.

## 8.4 Summary

8.4.1 A summary of the predicted landscape and visual effects can be found below:

**Table 8.1: Summary of Landscape & Visual Effects**

Receptor	Sensitivity	Year 1	Year 15
<b>Landscape Effects</b>			
Local Character Area: Meopham Downs	Medium	Minor Adverse	Negligible Adverse
Agricultural Fields	Medium	Moderate Adverse	Moderate Adverse
Field Boundaries	Medium	Minor Adverse	Minor Beneficial
Woodland & Tree Belt within the Site	Medium	Moderate Adverse	Minor Beneficial
Built form within the Site	Medium	Moderate Adverse	Moderate Beneficial
Character of the Site	Low Medium	Moderate Adverse	Moderate Beneficial
<b>Visual Effects</b>			
Residents on A227 and Chapmans Hill	Medium	Moderate Adverse	Minor Adverse
Industrial/Comm. Users on Heron Hill Lane	Low	Neutral	Neutral
Pedestrians on PRoW NS284	Low Medium	Negligible adverse	Neutral

Users of A227	Low	Negligible Adverse	Minor Beneficial
Pedestrians on PRoW NS285	Medium	Neutral	Neutral
Pedestrians on PRoW NS265	Medium High	Negligible Adverse	Neutral
Pedestrians on PRoW NS301/NS271	Medium	Neutral	Neutral
Users of Rectory Road / PRoW SD310	Medium	Neutral	Neutral

## 9 SUMMARY AND CONCLUSIONS

### 9.1 Overview

9.1.1 This Landscape and Visual Impact Assessment (LVIA) has been undertaken to evaluate the likely effects arising from the proposed residential development at Land at Blackthorn Farm, Culverstone Green. The assessment has been prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and includes a review of the Site's contribution to the purposes of the Green Belt, as outlined in national and local policy. The appraisal draws upon published character assessments, field survey, viewpoint analysis, and professional judgement.

9.1.2 The Site comprises approximately 5.4 hectares of predominantly agricultural land, physically and visually associated with the existing settlement pattern of Culverstone Green. It is bounded by strong vegetation and adjacent built form, including Hope Cottages, industrial premises and development along the A227 South Street. While located within the Green Belt, the Site is visually and perceptually contained, forming a logical extension to the settlement area. No national or local landscape designations apply to the Site.

9.1.3 The Site lies within the Meopham Downs Local Landscape Character Area (LCA), which has been assessed as having Medium sensitivity to the type of development proposed. Within the Site, landscape receptors include agricultural fields, field boundaries, woodland features, and the built infrastructure of Blackthorn Farm. These receptors vary in sensitivity, with the Site as a whole judged to have Low landscape value but Medium susceptibility, resulting in Low to Medium sensitivity overall.

9.1.4 At **Year 1**, the Parameters Plan sets out the location and extent of development within the western parcel of the Site. This introduces new built form, access roads and associated infrastructure, resulting in the permanent loss of pasture and internal landscape features. The eastern parcel is retained as open space. The removal of the central tree belt and the proximity of new development to the Site's boundaries will cause a noticeable change to the local landscape character. Effects are most pronounced in the western half of the Site, where receptors such as the agricultural fields, field boundaries and the existing built form of Blackthorn Farm will experience *Moderate Adverse* effects due to loss of land use, vegetation, and landscape structure. The wider Meopham Downs Landscape Character Area (LCA) is less affected, with overall effects considered *Minor Adverse* due to the limited spatial extent of change.

9.1.5 From a visual perspective at Year 1, the most sensitive receptors are residential properties along South Street and Chapmans Hill. These may experience filtered or partial visibility of new development, particularly from upper-storey windows, leading to *Moderate Adverse* effects. Road users, PRoW users and commercial premises around the Site are more visually separated by vegetation, fencing and landform, resulting in *Negligible to Minor Adverse* effects overall.

9.1.6 By **Year 15**, the landscape strategy illustrated in the Masterplan will have matured, improving the overall integration of the development. Reinforced boundary planting, tree-lined streets, open spaces and a 15-metre woodland buffer will help restore structure and soften built form. Built development will be set back from sensitive boundaries and arranged in an inward-facing layout to reduce visual prominence. As a result, landscape effects will lessen for most receptors: the Meopham Downs LCA remains largely intact (*Negligible Adverse*), the agricultural fields and internal character of the Site are permanently altered (*Moderate Beneficial*), while field boundaries and new planting contribute positively (*Minor Beneficial*).

9.1.7 Visually, the development will be increasingly screened or filtered by mature planting. For most residential receptors, the significance of visual effects reduces to *Minor Adverse* or *Neutral*, depending on location and viewing height. For other receptor groups, such as road users and PRoW users, the development will be perceived as part of a softened, well-contained settlement edge. In some locations such as along South Street, improvements to townscape character and green frontage will result in a *Minor Beneficial* effect.

9.1.8 Overall, the Proposed Development results in some adverse landscape and visual effects in the short term, particularly where it replaces open or semi-rural land. However, the long-term design, layout and

green infrastructure strategy successfully reduce the scale and prominence of change, supporting a transition to a well-integrated and visually appropriate extension to Culverstone Green.

9.1.9 The Site has also been appraised against the first four purposes of the Green Belt set out in the National Planning Policy Framework (NPPF). It contributes:

- **Weakly or none to Purpose (a):** containment is already provided by built form and vegetation;
- **Not at all to Purpose (b):** the Site does not contribute to preventing the merging of neighbouring settlements;
- **Moderately to Purpose (c):** development will alter the character of the Site and inherently comprise encroachment into the countryside, but will not materially affect the wider countryside;
- **Not at all to Purpose (d):** the Site does not contribute to the setting or special character of any historic town.

9.1.10 The Site is visually enclosed and weakly performing in Green Belt terms.

## 9.2 Conclusions

9.2.1 From a landscape and visual perspective, the Site presents a **suitable and appropriate location** for a sensitively designed residential development. Key conclusions are as follows:

- The Site is **visually well-contained** and physically aligned with the existing pattern of development at Culverstone Green;
- The **most sensitive visual receptors** are limited to a small number of adjacent residents, with the majority of views being filtered, oblique, or absent;
- The development **avoids the more sensitive eastern field** and incorporates robust mitigation, including a **15-metre buffer to ancient woodland**, structural planting, and new public open space;
- The Site's **contribution to Green Belt purposes is limited**, and development of the Site would **not undermine** the strategic function of the Green Belt in this location.

9.2.2 In conclusion, the Proposed Development is considered acceptable in landscape and visual terms, subject to the implementation of the landscape strategy and mitigation measures set out in this LVIA.



## Appendix A

### A.1 Introduction

A.1.1 The Landscape Institute and the Institute of Environmental Management & Assessment's Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3), 2013, notes in Chapter 1 that Landscape and Visual Impact Assessment (LVIA) relates to:

*"...the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity"*

A.1.2 The methodology employed in carrying out the LVIA of the Proposed Development is in accordance with the Guidelines set out in GLVIA 3 and Natural England landscape character guidance. The guidelines are not intended as a prescriptive set of rules, and the approach has been adapted to the specific project.

A.1.3 LVIA are undertaken by professionals who are also typically involved in the design of the landscape and the preparation of subsequent 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 clear evidence and reasoned argument.

A.1.4 The purpose of an LVIA is to identify the likely effects of change resulting from the Proposed Development, which can be used as a tool to optimise the design of a scheme and minimise the potential for adverse change to arise and to maximise the benefit of positive changes. Landscape and visual assessments are separate, although linked, processes with a distinction made between:

- Landscape - landscape character and the elements and features that contribute to the sense of place (landscape receptors); and
- Visual - people who experience views within the landscape (visual receptors).

A.1.5 An LVIA is typically accompanied by illustrative material, including baseline mapping and photographs of the Site itself and from the wider context.

A.1.6 There are typically three key stages to the LVIA process, with a further two optional stages carried out as required:

- Baseline Studies;
- Iterative Design;

- Assessment of Landscape and Visual Effects;
- Cumulative Assessment (should this be required);
- Night-Time Assessment (should this be required).

A.1.7 An overview of the assessment process is set out in Diagram 1 (below). the assessment of landscape and visual effects relies on identifying the interactions between the Proposed Development and the identified receptors, linking judgements between the sensitivity of the receptors and the magnitude of effect experienced. The sensitivity of a receptor is determined by combining judgements on the value attached to the receptor alongside its susceptibility, while the magnitude of an effect is determined by combining judgements on scale and duration.

### **Baseline Studies**

A.1.8 The purpose of baseline studies is to record the existing landscape features, characteristics, the way the landscape is experienced, and the area from which the existing site and Proposed Development may be visible to potential visual receptors. The following are typically undertaken as part of the baseline studies:

- Identification of the extents of the study area. This is based on professional judgement and may vary depending on the type of development proposed and landscape context.
- Zone of Theoretical Visibility (ZTV) modelling to assist in identifying potential viewpoints, should this be deemed necessary, dependent on professional judgement of the visual envelope of the Site/Proposed Development.
- Identification of potential representative viewpoints within the study area.
- A desktop study of patterns and scale of landform, land use and built development, relevant current planning policy (including landscape designations) and landscape character publications. Further localised character assessments may also be undertaken to supplement published assessments.
- A localised character assessment will normally also be carried out to supplement the published characterisation material to confirm whether the Site is representative of any of the key characteristics set out and to determine consideration of 'natural', 'cultural and social', and 'perceptual and aesthetic' factors. Factors typically considered may include the following, as relevant:
  - Landform and hydrology;
  - Land use and settlement;
  - Pattern/texture/line;
  - Scale and enclosure;
  - Historical development/time depth;
  - Activities and cultural association;

- Spatial structure and built form;
- Infrastructure;
- Movement, connectivity, and accessibility;
- Green Infrastructure;
- Enclosure/views;
- Tranquillity and remoteness; and
- Aesthetic or visual quality.

A.1.9 Where relevant, the future baseline of the Site and its context is also considered, in order to account for ongoing change in the landscape, for example developments that are under construction, and which will have altered the landscape context to the Site by the time the Proposed Development would be likely to be initiated.

A.1.10 For the avoidance of doubt, the future baseline context should not be confused with cumulative effects, which are addressed differently and assessed separately.

### **Design and Mitigation**

A.1.11 LVIA are undertaken by professionals who are also often involved in the design of the landscape, site design, and the preparation of subsequent management proposals. The design and assessment stages are iterative, with stages overlapping in part.

A.1.12 Mitigation measures are embedded within the design of the Proposed Development (or the development parameters for an outline application) arising from desk-based study and LVIA field work. These measures, such as the building layout, massing, height, and arrangement of open spaces and new structural planting, are termed 'Primary Mitigation'. Effective Primary Mitigation strategies avoid or reduce adverse effects by ensuring the key principles of the design of the development, as noted above, are sympathetic with the existing baseline.

A.1.13 Additional recommended measures to reduce adverse effects are termed 'Secondary Mitigation'. These may be illustrated in material accompanying the proposal, including a Design and Access Statement.

A.1.14 Typical Secondary Mitigation strategies can include:

- Additional design detail including building materials or landscape design approaches, including indicative species;
- A Landscape and Biodiversity Management Strategy to secure ongoing enhancement of landscape features;
- A Construction Environmental Management Plan to minimise effects arising during the construction process, typically including tree protection; and

- A programme of appropriate monitoring, agreed with the regulatory authority, so that compliance and effectiveness can be readily monitored and evaluated.

A.1.15 The contribution made by areas of planting introduced as part of the Proposed Development is also considered in terms of the effects at year 1 and the residual effects (allowing for growth of planting over time), and the height of this planting for assessment purposes is assumed to be as follows (based on an average growth rate of 1m in 3 years – the specific rate of growth varies according to species, soil, light, microclimate conditions and management):

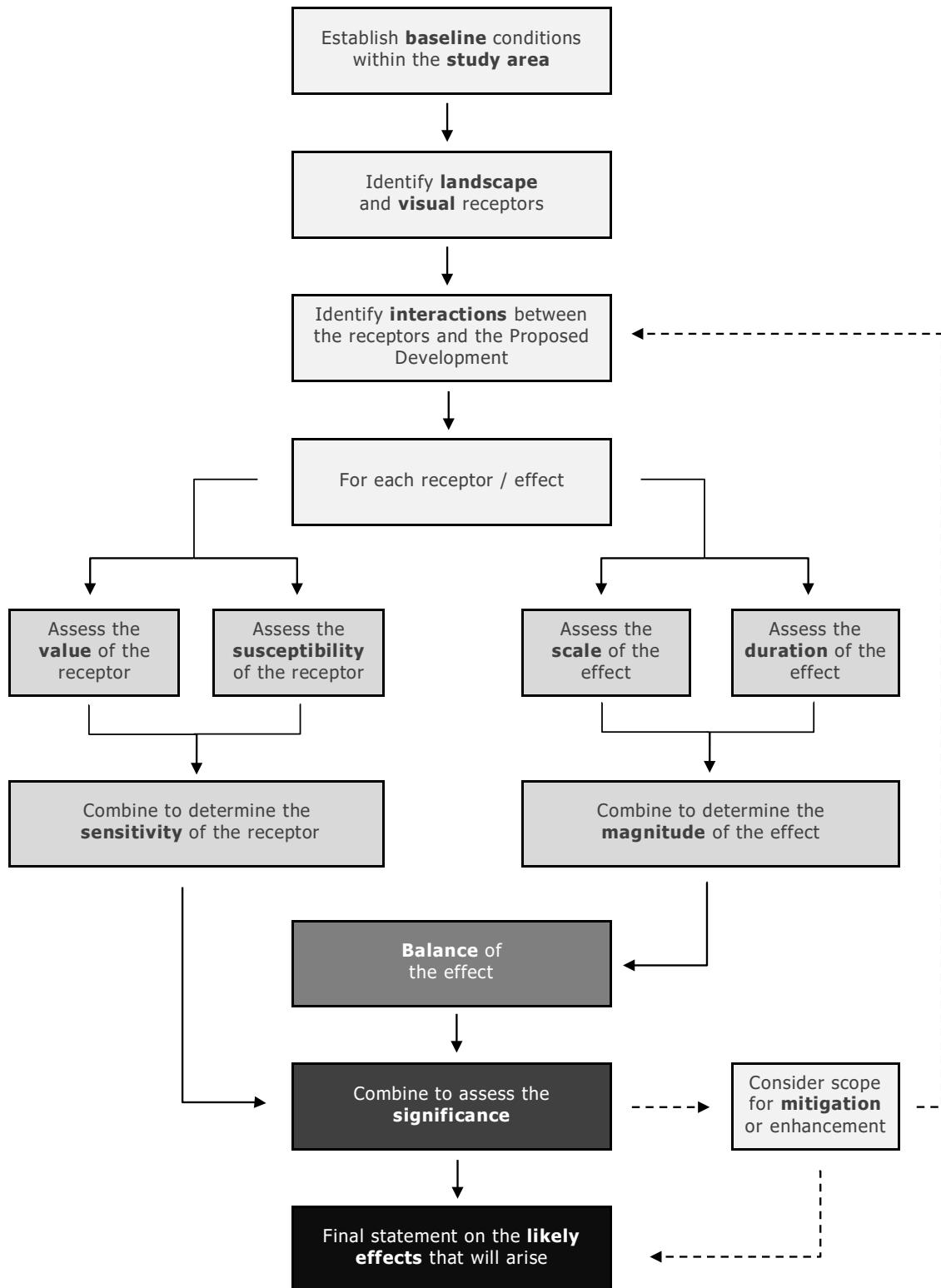
- Planting at Year 01: typically, 0.7-4.5 metres; and
- Planting at Year 15: typically, 5.5-9.5 metres.

A.1.16 In addition, measures may be taken to offset or compensate for adverse effects, if these are not already built into the design proposals. Typical compensation measures are the replacement of felled trees with new trees or off-site provision of public amenity or access where this may be lost within the Site.

### **Enhancement**

A.1.17 Whilst distinct from mitigation of adverse effects, enhancement may be achieved through the Proposed Development (e.g. the creation of a new landscape or public amenity/access; enhancement in character or view; or improved management of existing landscape features secured through the Proposed Development). The beneficial changes resulting from these measures are incorporated into assessment of landscape and visual effects.

**Diagram 1: Overview of the LVIA Process**



## A.2 Assessment of Landscape Effects

A.2.1 GLVIA 3 Paragraph 5.1 states that:

*"An assessment of landscape effects deals with the effects of change and development on landscape as a resource."*

A.2.2 Landscape effects occur as a result of changes to the physical fabric of the landscape that may give rise to alterations to its overriding character and how this character is experienced.

A.2.3 The significance of landscape effects is derived from a combination of assessments of the **sensitivity** of the landscape receptor and the **magnitude** of effect (change) experienced as a result of the Proposed Development.

### Sensitivity of Landscape Receptors

A.2.4 The sensitivity of a landscape receptor is a combination of the **value** of the landscape receptor and the **susceptibility** (in other words 'vulnerability') of the landscape receptor to the type of change proposed, using professional judgement.

#### Landscape Sensitivity - Value

A.2.5 The value of a landscape receptor is established during the baseline stage. The assessment of value is based on a combination of the importance of landscape-related planning designations and the following attributes (drawn from the Landscape Institute TGN 02/21 and Box 5.1 of GLVIA3):

- Natural and Cultural Heritage
- Landscape quality (condition): the measure of the physical state of the landscape. It may include the extent to which typical landscape character is represented in individual areas, the intactness of the landscape and the condition of individual elements.
- Scenic quality: the extent that the landscape receptor appeals to the visual senses;
- Perceptual aspects: the extent that the landscape receptor is recognised for its perceptual qualities (e.g. remoteness or tranquillity);
- Rarity: the presence of unusual elements or features;
- Representativeness: the presence of particularly characteristic features;
- Recreation: the extent that recreational activities contribute to the landscape receptor; and
- Associations: the extent that cultural or historical associations contribute to the landscape receptor.
- Distinctiveness
- Functional

A.2.6 Landscapes, including their character and features, may be designated for their landscape and visual qualities at a range of levels (national, county, and local level).

A.2.7 As a matter of principle, all landscapes are considered to be of value, as enshrined within the European Landscape Convention (ELC) 2004. The overall value for each landscape receptor is categorised as either **High**, **Medium**, or **Low** (as described below in **Table A.2.1**):

**Table A.2.1: Landscape Value**

Level	Criteria
High	Landscape area of distinctive components and characteristics that may also be nationally designated for scenic beauty. A landscape feature that makes a strong positive contribution to landscape character e.g. a mature tree or woodland.
Medium	Landscape area of common components and characteristics that may be designated at county or borough level for its landscape and visual qualities. A landscape feature that makes some positive contribution to landscape character.
Low	Landscape area/feature of inconsequential components and characteristics, undesignated and with little or no wider recognition of value, although potentially of importance to the local community.

### **Landscape Sensitivity - Susceptibility**

A.2.8 The susceptibility of the landscape is a measure of its vulnerability to the type of development proposed, without undue consequences for the maintenance of the baseline situation. Landscape character/features of low susceptibility would have a high capacity to accommodate change, and landscape character/features of high susceptibility would have a low capacity to accommodate change. The following criteria are taken into consideration in the assessment of the susceptibility of landscape character, although not all criteria are equally applicable or important within a given landscape / type of development proposed:

- Landform;
- Pattern/Complexity;
- Composition;
- Landcover;
- Relationship of a given landscape area or feature to the surrounding context and/or to existing settlements or developments; and
- Potential for appropriate mitigation within the context of existing character and guidelines.

A.2.9 With regard to landscape features, susceptibility relates to the potential for loss/retention of the relevant features in relation to the type of development proposed (for example trees within a Site are potentially highly susceptible to construction of an industrial shed, whereas they might not be to construction of residential units, as the latter provides more scope to mitigate by

design); and the ease with which such elements may be replaced, where appropriate. The susceptibility of each landscape receptor is categorised as **High**, **Medium**, or **Low** (as described below in **Table A.2.2**):

**Table A.2.2: Landscape Susceptibility**

Susceptibility	Criteria
High	The receptor is likely to have little scope to accommodate the type of development proposed without undue consequences upon its overall integrity.
Medium	The receptor is likely to have some scope to accommodate the type of development proposed without undue consequences upon its overall integrity.
Low	The receptor is likely to be able to accommodate the type of development proposed with little or no consequences upon its overall integrity.

A.2.10 Based on the combination of value and susceptibility, an assessment of landscape sensitivity is reached, defined as **High**, **Medium**, or **Low**. Typically, a high value and high susceptibility receptor would result in a receptor of high sensitivity; and a low value and low susceptibility receptor would result in a receptor of low sensitivity.

### **Landscape Magnitude of Effect (Change) - Scale**

A.2.11 Factors contributing to the scale of landscape change include:

- The extent/proportion of the physical landscape elements that will be altered with reference to their immediate and local/ wider contribution to the landscape;
- The degree to which aesthetic and/or perceptual aspects will be altered; and
- The geographical area that will be directly and indirectly altered.

### **Landscape Magnitude of Effect (Change) - Duration and Reversibility**

A.2.12 Factors contributing to the duration the change is experienced in the landscape (including consideration of management plans as appropriate) include:

- Whether the change is wholly reversible or permanent; and
- Whether the change is temporary (and if so, for what period of time).

A.2.13 The landscape magnitude of effect is informed by judgements about the precise nature of the change brought about by the Proposed Development both in terms of the existing landscape character and landscape elements / features and the addition of new landscape elements / features, its scale and its duration and reversibility (as described below in **Table A.2.3**):

**Table A.2.3: Landscape Magnitude of Effect (Change)**

Magnitude	Criteria
Large	Pronounced change to the existing landscape receptor that may affect an extensive area. The change may be long-term or may be irreversible.
Medium	Partial change to the existing landscape receptor that may affect a relatively extensive area. The change may be medium-term or may be irreversible.
Small	Limited change to the existing landscape receptor that may affect a relatively limited area. The change may be short-term or reversible.
Very Small	Very slight change to the existing landscape receptor that may affect a limited area. The alteration may be short-term or reversible.
None	No change to the existing landscape receptor.

### A.3 Assessment of Visual Effects

A.3.1 GLVIA 3 Paragraph 6.1 states that:

*"An assessment of visual effects deals with the effects of change and development on the views available to people and their visual amenity."*

A.3.2 The significance of visual effects is derived from a combination of assessments of the **sensitivity** of the visual receptor and the **magnitude** of effect (change) experienced as a result of the Proposed Development.

#### Viewpoint Selection

A.3.3 In order to assess the effects on visual receptors, a selection of publicly accessible viewpoints is made. This could include representative viewpoints (e.g. representing views of users of a particular footpath) and specific viewpoints (e.g. a key view from a specific visitor attraction).

A.3.4 Views may be categorised as either near distance, medium distance, or long distance with the relevant distance's dependant on the size and nature of the development, based on professional judgement.

A.3.5 Viewpoints fall into three broad categories:

- **Representative:** selected to represent the experience of different types of receptor;
- **Specific:** chosen because they are key and sometimes promoted viewpoints within the landscape; and
- **Illustrative:** demonstrating a particular effect or specific issues.

A.3.6 The type of view is typically described as transient (i.e. experienced when moving) or fixed (i.e. from a static location). It is also described in terms of the degree of screening or openness (e.g. open or uninterrupted; filtered (including where partially screened) by vegetation or other

structures; or curtailed by intervening land form, built form or vegetation) and the angle of view (e.g. frontal or oblique).

### **Sensitivity of Visual Receptors**

A.3.7 The sensitivity of a visual receptor is a consideration of the **value** of the view and the **susceptibility** of the visual receptor, the latter being primarily based on consideration of the extent to which a visual receptor is focused on appreciation of the landscape.

#### **Visual Sensitivity - Value**

A.3.8 The value of a visual receptor is established during the baseline stage and is categorised as **High, Medium, or Low**.

**Table A.3.1: Value of Views**

Value	Criteria
High	View off/from a location that is likely to be of national importance, either designated or with national cultural associations.
Medium	View off/from a location that is likely to be of local importance, either designated or with local cultural associations.
Low	View off/from a location that is not designated, with minimal or no cultural associations.

#### **Visual Sensitivity - Susceptibility**

A.3.9 The susceptibility of each visual receptor is a measure of their vulnerability to the type of development proposed, without undue consequences for the maintenance of the baseline situation. The following criteria are taken into consideration in the assessment of visual susceptibility:

- The extent to which the viewers' attention is focussed on the landscape;
- The extent to which the view contributes to the viewers' amenity experience; and
- The nature of the activity the viewer is involved in (or otherwise).

A.3.10 Professional judgement is used to determine these factors, based on considerations set out in **Table A.3.1** (above) and **Table A.3.2** (below):

**Table A.3.2: Susceptibility of Visual Receptor**

Susceptibility	Criteria
High	People at their place of residence;

	People engaged in outdoor recreation, including users of Public Rights of Way (PRoW), whose attention is likely to be focused on the landscape; and People travelling along recognised scenic routes or where their appreciation of the view contributes to the amenity experience of their journey.
Medium	People engaged in outdoor sport and recreation, where their appreciation of their surroundings is incidental to their enjoyment; and People travelling on secondary roads or country lanes, rail or other transport routes.
Low	People travelling on major roads; and People at their place of work.

A.3.11 The sensitivity of a visual receptor results from the combination of value and susceptibility and is rated as **High**, **Medium**, or **Low**. Typically, a high value and high susceptibility receptor would result in a receptor of high sensitivity; and a low value and low susceptibility receptor would result in a receptor of low sensitivity.

### **Visual Magnitude of Effect (Change) - Scale**

A.3.12 In the evaluation of the effects on views and the visual amenity of the identified receptors, the magnitude of visual effect is typically described with reference to:

- The scale of change in the view with respect to the loss or addition of features in the view and changes in its composition. Factors contributing to the scale of visual change include:
  - The angle of view in relation to the main activity of the receptor;
  - The distance of the viewer from the Proposed Development;
  - The extent of the area over which the changes would be visible; and
  - The degree of visual intrusion of the Proposed Development in the view.

### **Visual Magnitude of Effect (Change) – Duration and Reversibility**

A.3.13 Factors contributing to the duration the change is experienced visually in the evaluation of the effects on views and the visual amenity of the identified receptors, the magnitude of visual effect is typically described with reference to:

- Whether or not the view is experienced in fixed or transient views and, in the latter, whether it is intermittent/glimpsed or continuous; and
- The duration of the change, whether temporary or permanent.

A.3.14 The criteria for the magnitude of visual effects is set out in **Table A.3.3** below:

**Table A.3.3: Visual Magnitude of Effect (Change)**

Magnitude	Criteria
Large	The proposals will cause a pronounced change to the existing view, resulting in the loss or addition of features that will substantially alter the composition of the view. The change may be long-term or may be irreversible.
Medium	The proposals will cause a noticeable change in the view, resulting from the loss or addition of features in the view and will noticeably alter the composition of the view. The change may be medium-term or may be irreversible.
Small	The proposals will cause a limited change in the view, which would not materially alter the composition of the view. The change may be short-term or reversible.
Very Small	The proposals will cause a barely perceptible change in the view. The change may be short-term or reversible.
None	No change discernible in the view.

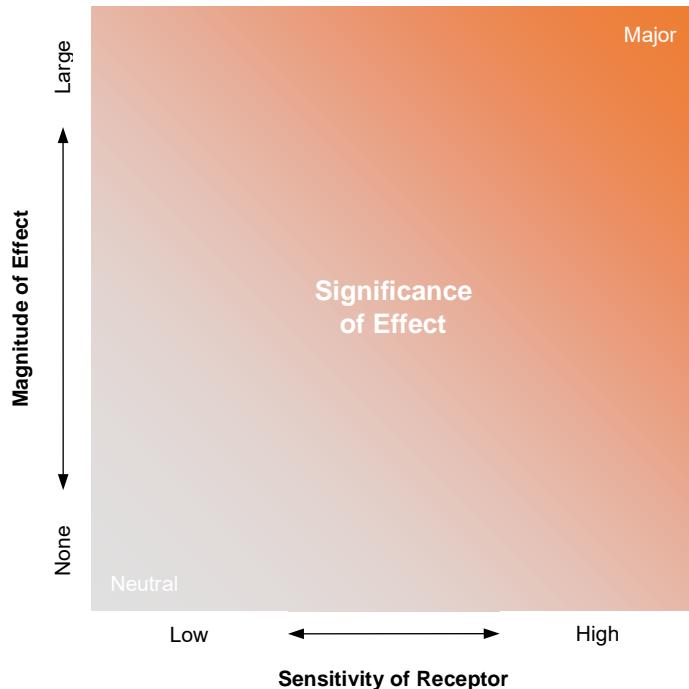
## A.4 Significance of Effects

A.4.1 In order to draw conclusions about the significance of landscape or visual effects, the combination of the sensitivity of the receptors and the magnitude of effect are considered for the Proposed Development at **Day 1** of the operational phase (once the Proposed Development has been completed); and, depending on the assessment, also at a point where planting associated with the Proposed Development will be establishing e.g. **Year 15**. In certain circumstances, it may also be appropriate to consider effects at construction and on decommissioning of the Proposed Development.

A.4.2 The significance of effects are rated on a scale of Neutral to Major. The assessment of significance of effects is subject to professional judgement but in broad terms, where a receptor of High sensitivity experiences a Large magnitude of effect as a result of the Proposed Development, the significance of effect is likely to be Major.

A.4.3 Conversely, where a receptor of Low sensitivity experiences a Very Small magnitude of effect as a result of the Proposed Development, the significance of effect is likely to be Negligible or Neutral.

**Figure A.4.1: Significance of Effects**



A.4.4 Where it is considered that there is potential for both beneficial and adverse changes, these magnitudes of effect (change) are noted and are defined as beneficial, adverse, or neutral. This consideration is termed the 'balance of effects', factoring in both the potentially beneficial and adverse aspects associated with a given change and is used and the balance of these considerations used to inform conclusions on significance of effect.

A.4.5 The assessment of residual effects refers to the likely effects of the Proposed Development that will remain once Secondary Mitigation measures are applied and also considers the growth of planting introduced within the Proposed Development (including where this is part of Primary or Secondary Mitigation).

A.4.6 For schemes subject to Environmental Impact Assessment, as governed by the Environmental Impact Assessment Directive (2011/92/EU), an assessment of whether or not the effect is considered 'significant' is required. This is relative to each scheme but, in general, effects of Major or Moderate (adverse/beneficial) significance are deemed 'significant'.

**Table A.4.1: Significance of Landscape Effects – Criteria**

Significance	Criteria
Major Beneficial	Alterations that would be substantially characteristic and result in a pronounced improvement of the existing landscape resource. Valued characteristic features would be restored or reintroduced as part of the Proposed Development.
Moderate Beneficial	Alterations that result in a partial improvement of the existing landscape resource. Valued characteristic features would be partially restored or reintroduced.
Minor Beneficial	Alterations that result in a limited improvement of the existing landscape resource. Characteristic features would be restored to a limited degree.
Negligible Beneficial	Alterations that result in a very slight improvement to the existing landscape resource, not uncharacteristic within the receiving landscape.
Neutral	Neither beneficial nor adverse effects on the existing landscape resource.
Negligible Adverse	Alterations that result in a very slight deterioration to the existing landscape resource, not uncharacteristic within the receiving landscape.
Minor Adverse	Alterations that result in a limited deterioration of the existing landscape resource. Characteristic features would be lost to a limited degree.
Moderate Adverse	Alterations that result in a partial deterioration of the existing landscape resource. Valued characteristic features would be partially lost.
Major Adverse	Alterations that would be substantially uncharacteristic and result in a pronounced deterioration of the existing landscape resource. Valued characteristic features would be wholly lost.

**Table A.4.2: Significance of Visual Effects – Criteria**

Significance	Criteria
Major Beneficial	Alterations that typically result in a pronounced improvement in the existing view.
Moderate Beneficial	Alterations that typically result in a noticeable improvement in the existing view.
Minor Beneficial	Alterations that typically result in a limited improvement in the existing view.
Negligible Beneficial	Alterations that typically result in a barely perceptible improvement in the existing view.
Neutral	Neither beneficial nor adverse effects on the existing view.
Negligible Adverse	Alterations that typically result in a barely perceptible deterioration in the existing view.
Minor Adverse	Alterations that typically result in a limited deterioration in the existing view.
Moderate Adverse	Alterations that typically result in a noticeable deterioration in the existing view.
Major Adverse	Alterations that typically result in a pronounced deterioration in the existing view.

## A.5 Green Belt Assessment Methodology

### Background Overview: The Green Belt: NPPF

A.5.1 Chapter 13 of the National Planning Policy Framework (NPPF) (December 2024) addresses the Green Belt, with **Paragraph 142** stating “*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*”.

A.5.2 **Paragraph 143** subsequently sets out the following five purposes of the Green Belt:

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

### Proposals within the Green Belt

A.5.3 **Paragraph 153** states that when considering any planning application

*“local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness<sup>55</sup>. ”*

A.5.4 **Footnote 55** sets out the exception: “Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate”

A.5.5 Paragraph 153 goes on to set out that: “**inappropriate development** is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘**Very special circumstances** will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

A.5.6 In relation to proposals affecting the Green Belt, **Paragraph 153** states that “local authorities should ensure substantial weight is given to any harm to the Green Belt, including harm to its openness”.

A.5.7 Any development in the Green Belt is considered inappropriate unless it is covered by the exceptions in Footnote 55 or, as set out in **Paragraph 154**, it falls into one of the exception categories which are:

- a) “buildings for agriculture and forestry;*
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*

- 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;*
- d) *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) *limited infilling in villages;*
- f) *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- 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) *Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
  - i. *mineral extraction;*
  - ii. *engineering operations;*
  - iii. *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
  - iv. *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
  - v. *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
  - vi. *development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.*

A.5.8 However, following from this, Paragraph 155 highlights that “the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where”:

*“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”*

A.5.9 **Paragraph 156** of the NPPF stipulates where major development involving the provision of housing is proposed on sites released from the Green Belt or on sites in the Green Belt subject to a planning application, the following contributions (**‘Golden Rules’**) should be made:

*“affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*

*necessary improvements to local or national infrastructure; and*

*the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”*

A.5.10 Paragraph 158 goes on to state that if “a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”.

A.5.11 Lastly, the NPPF states at **Paragraph 159**:

*“The improvements to green spaces required as part of the **Golden Rules** should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan.”*

A.5.12 The 2025 Planning Policy Guidance (PPG) update on Green Belt complements the 2024 update of the NPPF providing information on the key considerations for assessing the contribution Green Belt land to green Belt purposes and identifying grey belt. As noted in the Scope of Guidance, the 14 paragraphs contained in the guidance set out:

- *“the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land*
- *the considerations involved in determining whether release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;*
- *guidance for considering proposals on potential grey belt land*
- *guidance on identifying sustainable locations when considering the release or development of Green Belt land*
- *updated guidance on how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, should contribute to accessible green space*
- *updated guidance on how to consider the potential impact of development on the openness of the Green Belt”*

A.5.13 It is noted in the introductory text, in relation to identification of grey belt, that “Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework (NPPF).

A.5.14 Criteria for evaluating the contribution of Green Belt land to purposes a, b and d, are set out in PPG Paragraph 005 Reference ID: 64-005-20250225, and these are reflected in the criteria set out at **Table A.5.1**. The guidance clarifies that purposes A, B and D relate to large built up areas and towns and not to villages.

A.5.15 PPG Paragraph: 006 Reference ID: 64-006-20250225 notes that where designations or policies covered by footnote 7 “would provide a strong reason for refusing or restricting development....it may only be possible to **provisionally** identify such land as grey belt in advance of more detailed specific proposals”

A.5.16 PPG Paragraph: 011, Reference ID: 64-011-20250225, notes how should authorities establish whether Green Belt land is in sustainable locations. It states:

*“The Framework is clear that, when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location would be appropriate for the kind of development proposed. Similarly, when making decisions regarding planning applications on grey belt land, authorities should ensure that the development would be in a sustainable location. For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate.*

*Whether locations are sustainable should be determined in light of local context and site or development-specific considerations. However, in reaching these judgements, national policy is clear that authorities should consider opportunities to maximise sustainable transport solutions, as set out in paragraphs 110 and 115 of the NPPF.”*

A.5.17 PPG Paragraph: 012, Reference ID: 64-012-20250225 notes how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, contribute to accessible green space. It states that the following contributions to accessible green space should be considered:

- *“New residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.*
- *Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.*
- *Where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways).*

- *Proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.*
- *Where appropriate, authorities should consider the use of conditions or planning obligations. The Community Infrastructure Levy can also be used to fund improvements to existing greenspaces or the provision of new ones. Local authorities should consider arrangements for the long-term maintenance of green spaces.”*

A.5.18 PPG Paragraph: 013, Reference ID: 64-013-20250225 identifies the factors that can be taken into account when considering the potential impact of development on the openness of the Green Belt. These include, but are not limited to the following:

- *“openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.”*

A.5.19 PPG Paragraph: 014, Reference ID: 64-014-20250225 notes how should harm to the Green Belt including harm to its openness shall be considered if a development is not inappropriate development. It states:

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

*This is consistent with rulings from the courts on these matters that, where development (of any kind, now including development on grey belt or previously developed land) is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by “very special circumstances”.*

### **Criteria for Assessment of the contribution of the Site to Purposes (a), (b), (c) and (d) of the Green Belt**

A.5.20 Should it not qualify as Previously Developed Land, or grey belt, the Site or relevant area of Green Belt is assessed against the first four purposes of the Green Belt as set out in Paragraph 143 of the NPPF:

- a) to check the unrestricted sprawl of large built-up areas*
- b) to prevent neighbouring towns merging into one another;*

- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns..."

A.5.21 With respect to the fifth purpose of the Green Belt, that is (e) “*to assist in urban regeneration by encouraging the recycling of derelict and other urban land*”, should the Site or relevant area of Green Belt be brought forward for development it would not prejudice derelict or other urban land being brought forward for urban regeneration. The principle of retaining land within the Green Belt holds true for all areas within the Green Belt, therefore the Site is considered to make the same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt. Accordingly, no additional specific assessment is undertaken.

A.5.22 The criteria for the assessment of the contribution that a Site or relevant area of Green Belt makes to the purposes of the Green Belt and to the ability of the remaining Green Belt to fulfil the purposes, are set out in **Table A.5.1**:

**Table A.5.1: Purposes of the Green Belt - Assessment Criteria**

Purpose	Criteria
a - Check the unrestricted sprawl of large built-up areas <sup>1</sup>	<p><b>Strong:</b> Development of the land would be strongly perceived as sprawl, insofar as it is adjacent or near to a large built-up area, is not contained by robust physical features that could restrict and contain development and/or would extend the settlement in an incongruous pattern (such as an extended “finger” of development into the Green Belt).</p> <p><b>Moderate:</b> Development of the land would be perceived as sprawl to a moderate extent, insofar as it is adjacent or near to a large built-up area, but also contains features that weaken the lands contribution to purpose A, such as (but not limited to): having physical features in reasonable proximity that could restrict and contain development; being partially enclosed by existing development, such that new development would not result in an incongruous pattern of development; contains existing development; or is subject to other urbanising influences.</p> <p><b>Weak or None:</b> Development of the land would not be perceived as sprawl, or weakly, as it is not adjacent to or near a large built up area or is largely enclosed by significant existing development.</p>
b - Prevent neighbouring towns from merging <sup>1</sup>	<p><b>Strong:</b> No built or engineered forms present and perceived as inherently undeveloped and/or rural in character, forming a substantial part of a gap between towns and the development of which would be likely to result in the loss of visual separation of towns.</p> <p><b>Moderate:</b> May be location in a gap between towns but contribution to purpose B weakened by such considerations as (but not limited to) presence of built or engineered forms; being a small part of the gap between towns; and having the capacity to be developed without loss of visual separation between towns - due to the presence (in close proximity) of structures, natural landscape elements or topography that preserves visual separation.</p> <p><b>Weak or None:</b> Does not form part of a gap between towns, or where it does, is a small part of the gap and does not contribute to visual separation</p>

<sup>1</sup> Villages are not considered to be large built up areas or towns as per PPG Paragraph 005.

Purpose	Criteria
c - Assist in safeguarding the countryside from encroachment	<p><b>Strong:</b> No built or engineered forms present and perceived as inherently undeveloped and/or rural in character.</p> <p><b>Moderate:</b> Built or engineered forms present but retaining a perception of being predominantly undeveloped and/or rural in character.</p> <p><b>Weak or None:</b> Built or engineered forms are present, with perceptions ranging from minimally developed or rural in character to inherently developed or urban in nature.</p>
d - Preserve the setting and special character of historic towns <sup>1</sup>	<p><b>Strong:</b> Forms part of the setting of the historic town and makes a considerable contribution to its special character. Such as being within, adjacent to, or of significant visual importance to the historic aspects of the town.</p> <p><b>Moderate:</b> 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</p> <p><b>Weak or None:</b> Not adjacent to or near an historic town, not forming part of the setting of a historic town or having no visual, physical, or experiential connection to the historic aspects of a historic town.</p>

**Assessment of the Site, based on its contribution to Purposes (a), (b) and (d), with regard to whether the Site can be considered as “Grey Belt”**

A.5.23 ‘Grey Belt’ is defined in the Glossary within the NPPF as:

**“Grey Belt:** For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7<sup>2</sup> (other than Green Belt) would provide a strong reason for refusing or restricting development.”

A.5.24 Therefore, subject to there being no strong reason for refusing development<sup>3</sup> (as per footnote 7) if the Site or relevant Green Belt area does not contribute strongly to Purposes (a), (b) and (d), the Site/area is ‘Grey Belt’.

<sup>2</sup> NPPF Footnote 7: “The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”

<sup>3</sup> As per Paragraph 006 of the PPG: “As defined in the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. In reaching this judgement, authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. Where this is the case, it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals.”

**Assessment against the characteristics of the Green Belt to determine whether the development of the Site should not be considered  
'Inappropriate'**

A.5.25 To satisfy NPPF Paragraph 155, for the Proposed Development to not be regarded as inappropriate, it will be necessary to demonstrate that the Site or relevant Green Belt area is Grey Belt land and that its development would not fundamentally undermine the purposes (taken together) of the Green Belt across the area of the plan.

A.5.26 To determine if the Site or relevant Green Belt area comprises Grey Belt the methodology above will be used. It is then necessary to establish the degree to which the whole of the remaining Green Belt within the relevant plan area fulfils Purposes (a), (b), (c), (d) and (e) of the Green Belt, that is at the strategic level of function regarding purposes of the Green Belt.

**Definitions**

A.5.27 **Table A.5.2** below provides a glossary of the terms used in relation to the Green Belt assessment.

**Table A.5.2: Definitions**

Term	Definition
Brownfield	(see Previously Developed Land)
Character	A distinct, recognisable and consistent pattern of elements in the landscape that differentiates one area from another.
Coalescence	The physical or visual linkage of large built-up areas.
Countryside	In planning terms: land out with the settlement boundary; and/or, In broader terms: the landscape of a rural area.
Defensible Boundary	A physical feature that is readily recognisable and likely to be permanent.
Encroachment	Physical incursion of a large built-up area beyond the limits of the existing built-up area into an area perceived as countryside.
Exceptional Circumstances	As per Paragraph 145 of the NPPF these are fully evidenced and justified circumstances for altering Green Belt boundaries through the preparation of or updating of plans.
Golden Rules	As per Paragraphs 155 and 156 of the NPPF "Golden Rules" are conditions which must be met, alongside other requirements, for major development providing housing on sites released from the Green Belt or on sites in the Green Belt, subject to a planning application. The "Golden Rules" are set out in Paragraph 156 of the NPPF.
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Greenfield	Land (or a defined site) usually farmland, that has not previously been developed.

Term	Definition
Grey Belt	Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. Grey Belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) in the NPPF would provide a strong reason for refusing or restricting development.
Historic Town	A town which falls under the protection of a Conservation Area or Local Plan policies that protect their historic character and setting. An Historic Town typically has origins dating back to a significant historical period and retains a strong historic character.
Inappropriate Development	Development, which is harmful to the Green Belt, that can only be approved in "very special circumstances", as stated in Paragraph 153 of the NPPF. Inappropriate Development exceptions are set out in Footnote 55 and Paragraphs 154 and 155.
Large Built-up Area	An area that corresponds to the settlements identified in the relevant Local Plan, including those inset from the Green Belt.
Merging	(see Coalescence)
Neighbouring Town	Refers to settlements identified within the relevant Local Plan and those within the neighbouring authorities' administrative boundary that abut the Green Belt.
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Openness	Openness is taken to be the degree to which an area is primarily unaffected by built features, in combination with the consideration of the visual perception of built features. In order to be a robust assessment, this should be considered from first principles, i.e. acknowledging existing structures that occur physically and visually within the area, rather than seeing them as being 'washed over' by the existing Green Belt designation.
Previously Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built -up areas such as private gardens, parks, recreation grounds and allotments and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Sprawl	The outward spread of a large built-up area in an incoherent, sporadic, dispersed or irregular way.
Very Special Circumstances	Circumstances in which "potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations". Paragraph 153 of the NPPF. These need to be satisfied to allow planning permission for a development within the Green Belt.

<b>Term</b>	<b>Definition</b>
Villages	Refers to settlements identified as villages within the settlement hierarchy in the relevant Local Plan.

## Statements of Environmental Opportunity

- SEO 1:** Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations.
- SEO 2:** Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs, for their internationally and nationally important habitats and species, cultural heritage and recreational value and to help to deliver climate change mitigation and adaptation. Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, while recognising their contribution to sense of place, sense of history and tranquillity.
- SEO 3:** Manage and enhance the productive mixed farming landscape of the North Downs and the mosaic of semi-natural habitats including the internationally important chalk grassland. Promote sustainable agricultural practices to benefit soils, water resources, climate regulation, biodiversity, geodiversity and landscape character while maintaining food provision.
- SEO 4:** Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness, particularly on or alongside the boundaries of the designated landscapes within the North Downs.



Children enjoy the extensive views from Wye NNR across adjoining NCAs. The NCA offers opportunities for access and education.

## Statements of Environmental Opportunity

**SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations.**

**For example, by:**

- Conserving the downland settlement pattern of nucleated villages, irregular fields and scattered farmsteads linked by a network of narrow, winding lanes and characteristic sunken 'hollow ways' through appropriate planning policies and development management, and in particular promotion of Kent Downs and Surrey Hills Area of Outstanding Natural Beauty (AONB) design guides.
- Protecting from damage the rich and varied heritage of historic buildings, settlements and sites dating from the prehistoric period onwards, including iron-age hill forts, defensive coastline installations and traditional farmsteads, and improving management, access to and sensitive interpretation of historic features.
- Improving management of historic parklands and any associated key habitats such as ancient and veteran trees, ancient woodland and species-rich grassland. Works such as successional planting, coppicing or reversion of arable back to grassland should be prioritised and informed by assessment of the historic design and significance of parkland.

**Continued on next page...**



The NCA has a number of heritage assets including the megalithic remains at Kit's Coty as shown here.

**SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations.**

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- Conserving and appropriately managing ancient trackways such as the North Downs Way National Trail which links Dover and Guildford, and the Pilgrims' Way which links Canterbury and Winchester; and working across sectors to promote and strengthen the network through high-quality interconnecting routes, increasing the benefits of these routes for biodiversity, health and local businesses.
- Using AONB design guidance and understanding of the area's traditional and historic architecture, and its distinct local materials (flint, chalk, brick, timber and tiles) and patterns of settlement, to inform appropriate conservation and use of historic buildings, and to plan for and inspire any new development which makes a positive contribution to local character.
- Seeking opportunities to minimise the impact of new developments, including visual intrusion, disturbance and noise, on the tranquillity and beauty of the countryside. Green infrastructure planning should be maximised for its multiple benefits and best practice should be shared locally.
- Working in partnership with Kent Downs and Surrey Hills Areas of Outstanding Natural Beauty to identify management opportunities in accordance with their respective management plans<sup>12</sup>.
- Seeking to increase awareness and maximising the potential of the various historic, natural and cultural assets, improving access to and interpretation of sites and features, including the world-renowned White Cliffs of Dover, as a platform for enhanced education and to enthuse local communities, linking them with their local geology, wildlife and cultural and historic environments. At the same time there is a need to recognise and manage the impact of increased visitor numbers on sensitive sites.

<sup>12</sup> Surrey Hills Area of Outstanding Natural Beauty Management Plan 2009–2014, Surrey Hills Board (2009); Kent Downs Area of Outstanding Natural Beauty Management Plan 2009–2014, Kent Downs AONB Unit (2009)

**SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs, for their internationally and nationally important habitats and species, cultural heritage and recreational value and to help to deliver climate change mitigation and adaptation. Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, while recognising the contribution to sense of place, sense of history and tranquillity.**

**For example, by:**

- Supporting the sustainable re-establishment of coppice management to appropriate areas of woodland, where this will improve biodiversity interest while providing a local resource including wood fuel.
- Seeking to work in partnership to aid co-ordinated conservation management, particularly where there are woodlots. Managing all woodlands as single entities aimed at benefiting the whole wood, its biodiversity, its contribution to landscape character, and the provision of community and other benefits where appropriate.
- Supporting existing markets and encouraging new markets for the products of native woodland underwood and timber. This will provide the market driver to encourage and maintain viable and sustainable woodland management.
- Encouraging the positive management of open habitats and spaces, such as rides and glades, for their landscape, biodiversity and cultural benefits, especially where they will support rare species, such as Duke of Burgundy fritillary. Maintaining an appropriate balance of well-structured woodland and transitional and open habitats will produce a mixed structure of tree species and stand age, benefiting biodiversity.
- Working to increase public understanding and appreciation of the importance of woodlands, including the impacts of harmful activities and inappropriate management. Utilising the woodland resource for education, appropriate recreation and research, furthering our understanding of the role of woodlands in a changing climate.
- Ensuring that the North Downs Woodland and Mole Gap to Reigate Escarpment Special Areas of Conservation attain and retain favourable conservation status as an element of the Natura 2000 network. Also, ensuring that the woodland Sites of Special Scientific Interest are in favourable condition and that local sites are in positive management.
- Protecting and expanding the existing urban tree resource, recognising its multiple benefits, including its role in climate change mitigation.
- Targeting the expansion and re-linking of existing semi-natural woodland, benefiting biodiversity and landscape, where it can re-connect isolated woodland blocks and help to prevent soil erosion and nutrient run-off (where this does not result in loss of existing important habitats such as chalk grassland). Taking into account future climate change, looking to enhance the coherence and resilience of woodlands, hedgerows, trees and other habitats to create robust networks of woody and open semi-natural habitats.
- Creating new areas of broadleaved woodland, where it accords with the landscape character of the area, helping to maintain tranquillity while providing a local recreational resource and further source of wood fuel and high-quality timber products.
- Encouraging conservation management of game woodlands as promoted by the British Association for Shooting and Conservation and sharing best practice locally, as shown in the Kent Downs AONB game management guidance.

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**SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs, for their internationally and nationally important habitats and species, cultural heritage and recreational value and to help to deliver climate change mitigation and adaptation. Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, while recognising the contribution to sense of place, sense of history and tranquillity.**

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- Recognising and managing the risks of tree diseases and woodland pests, taking co-ordinated conservation action to safeguard the woodland resource, and considering the close vicinity to the continent from where diseases can spread.
- Conserving ancient and veteran trees within the landscape for the benefit of species that depend upon them, and for their heritage value and contribution to a sense of place. Planning and implementing a programme to develop the next generation of hedgerow trees and future veterans, choosing appropriate species and taking into account their resilience to climate change.
- Ensuring that populations of deer are managed to reduce the damage caused to the natural regeneration of woodland (and woodland flora). High populations will have major impacts on ancient woodland flora and coppice management.



Wood chipping in action. The woodland resource provides an excellent opportunity for biomass energy in the form of wood chip.

**SEO 3: Manage and enhance the productive mixed farming landscape of the North Downs and the mosaic of semi-natural habitats including the internationally important chalk grassland. Promote sustainable agricultural practices to benefit soils, water resources, climate regulation, biodiversity, geodiversity and landscape character while maintaining food provision.**

**For example, by:**

- Working with farmers, land managers and communities to positively shape the agricultural landscape while preserving and enhancing ecological and cultural assets.
- Restoring and strengthening the mosaic of connecting landscape and habitat features including the patchwork of smaller downland banks, hedgerows, unimproved hay meadows, pockets of heath and acid grassland, flower-rich roadside verges and uncultivated field corners, field margins and woodlands.
- Managing and restoring existing chalk grassland habitats. Seeking to integrate chalk grassland management into the farming business to allow for extensive grazing, promoting initiatives which allow for the sustainable management of chalk grassland and help to secure best practice management of this internationally important habitat type.
- Working with landowners to seek opportunities for arable reversion to chalk grassland in locations with the highest potential for the re-creation of this habitat and in areas where it will bring the greatest benefits. Considering arable reversion to chalk grassland where it will bring particular benefits for aquifer recharge and to assist in water quality regulation, looking for locations that maximise these benefits along with benefits for biodiversity and the landscape.
- Conserving and appropriately managing associated chalk habitats that include rare chalk scrub and heath and calcareous flushes at the foot of the scarp, strengthening the overall mosaic of chalk downland habitats and benefiting their dependent species.
- Working in partnership to enable the restoration of chalk grassland at a landscape scale, seeking to secure grazing where required on difficult sites, identifying and linking green hay donor and recipient sites and piloting restoration techniques. Supporting research to increase our understanding of chalk grassland habitats and species and to advance our knowledge of what is needed to create coherent and resilient ecological networks within the chalk landscape and the multiple benefits this may provide, including enhancement of landscape character.
- Restoring and planting new hedgerows to reinforce historic field boundary patterns, especially where they: run across slopes to provide a buffer to soil erosion and nutrient run-off (important in the Great Stour Priority Catchment); follow parish boundaries or long-established rights of way (especially historic drove ways) or otherwise support the distinctive character of the landscape; and provide a link between isolated habitats.
- Creating wide grassland buffer strips across steeper slopes and alongside hedgerows, rivers and other watercourses, particularly in areas of arable farmland, to help to prevent soil erosion and nutrient run-off and to enhance the habitat network.

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**SEO 3: Manage and enhance the productive mixed farming landscape of the North Downs and the mosaic of semi-natural habitats including the internationally important chalk grassland. Promote sustainable agricultural practices to benefit soils, water resources, climate regulation, biodiversity, geodiversity and landscape character while maintaining food provision.**

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- Working with landowners to integrate arable habitats into the farming system. Encouraging the uptake of measures such as conservation headlands, low-input cereals and grassland buffer strips to optimise the multiple benefits for biodiversity, water, soil regulation and pollination services while conserving, enhancing and expanding the range of arable wild flowers. In particular, maximising opportunities for providing high-quality nesting and feeding habitat for farmland birds such as corn bunting and grey partridge.
- Conserving and enhancing traditional orchards of the National Character Area (NCA), seeking new markets for their products and exploring potential for community orchards.
- Working with landowners to integrate any new and novel crops into the NCA as a result of market or climatic drivers, promoting sustainable management and integrating the crops into the landscape appropriately. Seeking to monitor the impacts of changing farming practices.
- Sympathetically managing soil and water resources to ensure the long-term productivity and economic viability of agriculture and increasing the ability of agricultural systems to withstand extreme weather and adapt to and mitigate climate change, improving water and soil quality.
- Managing land in a way that retains the legibility of the dry valleys and associated geomorphology and seeks to retain and improve the network of geological exposures in disused pits and quarries across the area.

**SEO 4: Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness, particularly on or alongside the boundaries of the designated landscapes within the North Downs.**

**For example, by:**

- Creating high-quality, well-managed accessible natural green space within and surrounding urban areas as part of comprehensive green infrastructure planning, providing significant local recreational opportunities that meet the Accessible Natural Greenspace Standard (ANGSt) while benefiting health and wellbeing and providing habitats and green space linkages, increasing the permeability of the urban landscape to biodiversity and building on existing networks.
- Improving water quality by careful design to address the potential issues of pollution and contamination by run-off and leakage through water pathways. Creating new wetlands as part of sustainable drainage systems, helping to provide flood alleviation. In addition, creating extensive reedbeds where potentially polluted waters enter these wetlands to filter out pollutants and provide benefits for water quality.
- Promoting the use of London's existing frameworks to inform the design of new landscapes associated with new development and green infrastructure within Greater London, including implementation of the All London Green Grid.
- Maintaining the existing downland character as a setting for new development (where allocated and approved), ensuring that this does not impact adversely on the special qualities of the designated landscapes, conserving the tranquillity and geodiversity of the area through planning and sympathetic design, in particular minimising light spill and traffic noise to retain the 'undisturbed' feel of parts of the NCA and enhancing local landscape character.
- Promoting the use of sustainable and locally sourced materials, vernacular building techniques and styles, and existing landscape character to inform design and ensure integration with the surrounding landscape.
- Targeted planting of woodland and trees surrounding existing and new development and major transport corridors where appropriate within the existing context, helping to provide climate change adaptation and mitigation, flood alleviation, landscape character and biodiversity benefits.
- Identifying opportunities for community involvement in projects through design and implementation to foster ownership, involvement and support of local communities and to help to create environments which improve the lives, livelihoods and health of local people and communities.
- Planning schemes which connect to or incorporate an existing or planned low carbon transport network, such as walking and cycling routes.
- Developing a strategic approach to green infrastructure across the NCA and its boundaries to take account of the existing urban areas and proximity of the NCA to areas of growth, planning a network of green spaces in the urban and urban fringe areas and adjacent countryside.

## Additional opportunities

**1. Conserve and enhance important geological sites and exposures of international importance, inland and along the coastline, including the White Cliffs of Dover, in order to maintain and enhance their geodiversity and biodiversity interest, cultural significance and sense of place.**

**For example, by:**

- Protecting, conserving and enhancing important inland geological exposures, for their geological, cultural and biological interest. In particular, raising awareness of the geological, ecological and cultural interest within the rich heritage of abandoned chalk pits and quarries throughout the area, providing links to the area's cultural history.
- Planning for and managing the effects of coastal change, by allowing the operation of natural coastal processes and improving the sustainability of current management practices, allowing for maintenance of the geological interest of the highly distinctive chalk cliff coastline. This will benefit the maritime cliff-ledge plant communities and breeding bird colonies, while maintaining the dramatic landscape which provides a powerful sense of place.
- Promoting continued research into coastal geology, helping to inform future decision making.
- Maximising the opportunities presented by the geodiversity of the NCA for education, research and tourism, in particular seeking to use the assets to engage with local communities. The geological features are an international scientific resource and can help people to appreciate the evolution of the landscape, its habitats and wildlife. Awareness of this value should be promoted, including the interrelationships between geology, wildlife and human activity, with improved access and interpretation where appropriate to inspire and enthuse.

## Additional opportunities continued

**2. Protect the important water resources of the NCA, including the North Downs chalk aquifer, rivers and associated wetlands, to safeguard the quality and quantity of public, private and agricultural water supplies and to bring about benefits for biodiversity, water quality and regulation of flooding.**

### For example, by:

- Protecting the chalk aquifer by promoting good agricultural and land management practices, helping to bring improvements to groundwater quality. Further, promoting sustainable use of water resources across sectors, protecting the aquifer from over-abstraction and safeguarding the water supply which is derived from the aquifer.
- Adopting a landscape-scale approach and working at the catchment scale to safeguard the surface water resources of the NCA, especially those failing to meet Water Framework Directive objectives for good ecological status. Working in partnership across sectors and NCA boundaries to tackle the challenges associated with flood risk, pollution and low flows.
- Managing, restoring and expanding the wetland habitats of the valley floors of the rivers Mole, Darent, Medway and Great Stour. Affording priority to flood meadows, flood plain grazing marsh, fen and reedbeds, and intertidal mudflats such as on the River Medway, and optimising opportunities for restoring natural river geomorphology where this is of particular benefit to biodiversity but is designed to meet the challenges of low flow conditions, and bringing rivers back into continuity with their flood plains to help to sustain these habitats for the benefit of biodiversity and the alleviation of downstream flooding.
- Identifying opportunities for research that improves our understanding of how to respond to and plan for climate change impacts and future consumer demands, and the interrelationships between supply and demand in adjoining NCAs, including the impacts of water availability on key biodiversity sites.
- Drawing on best practice principles such as those established under catchment sensitive farming and building on and supporting existing stakeholder groups to help to deliver a good water environment across the North Downs, benefiting biodiversity and local communities.
- Improving linear and car-free access along river corridors where appropriate, increasing opportunities for enhanced access, recreation and community engagement.

# ASH DOWNS

## PHOTOGRAPH



## CHARACTERISTIC FEATURES

A pleasant mix of deep, dry pastoral valleys enclosed by wooded ridges and species rich hedgerows, with broad plateau tops beyond.  
Small valley-bottom villages and large 20th century settlements on plateau.  
A winding network of narrow, historic lanes often eroded by traffic

## LANDSCAPE ANALYSIS

### Condition

The pattern of landscape elements is coherent and in most cases reflects the underlying landform. Some visual detractors such as commercial buildings and unsympathetic land uses intrude into some of the views. The high ecological value of the area in general, supported by the wooded network on ridges and shaws, is reduced by the intensity of arable cultivations on the plateau. The condition of heritage features such as field boundaries and vernacular buildings is good, however, much recent isolated development using unsympathetic materials has a negative impact. Overall, the area is considered to be in good condition.

## CONTEXT

Regional: North West Kent

### Condition

good	REINFORCE	CONSERVE & REINFORCE	<u>CONSERVE</u>
moderate	CREATE & REINFORCE	CONSERVE & CREATE	CONSERVE & RESTORE
poor	CREATE	RESTORE & CREATE	RESTORE

low      moderate      high

### Sensitivity

## SUMMARY OF ANALYSIS

### Condition

### Good.

Pattern of elements: Coherent.  
Detracting features: Some.  
Visual Unity: Coherent.  
Cultural integrity: Good.  
Ecological integrity: Moderate.  
Functional Integrity: Strong.

### Sensitivity

### High.

The characteristic features of this landscape are strongly represented and portray both an historic and ancient time-depth. Recent development of urban areas has a localised effect; the area retains local distinctiveness and a strong sense of continuity. The existing highways and the evidence of vernacular materials (such as flint) in historic buildings, in particular, enhance the sense of place. Visibility is moderate due to the intermittent tree cover. The area is considered to be of high sensitivity.

### Sensitivity

### High.

Distinctiveness: Characteristic.  
Continuity: Ancient.  
Sense of Place: Strong.  
Landform: Apparent.  
Extent of tree cover: Intermittent.  
Visibility: Moderate.

## LANDSCAPE ACTIONS

Conserve the small scale of the agricultural use of the valley slopes, retaining hedged enclosure and applying long-term management plans for this purpose.  
Conserve the wooded edge to the arable plateau which encloses the landscape and contains the wider views.  
Conserve and enhance the use of vernacular materials and the scale of historic built form.  
Resist the intrusion of large-scale buildings or groups of buildings into the view.  
Conserve the settlement pattern with isolated, small villages on valley bottoms and hamlets on the plateau.  
Conserve the dominance of the broadleaf woodland in the landscape.

## SUMMARY OF ACTIONS

### CONSERVE.

Conserve broadleaf woodland cover  
Conserve small scale field pattern on valley sides  
Conserve wooded edges to arable plateau  
Conserve the impact of vernacular materials and the historic scale of built form  
Conserve the enclosure of settlements within wooded areas  
Conserve original highway characteristics

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## 8. Meopham Downs



### Landscape Description

Meopham Downs is a large character area, stretching from the centre to the south of Gravesham Borough along the eastern edge of Sevenoaks District.

The majority of the geology comprises Upper Chalk and a wide band of Clay with Flint, stretching from north to south. An area of Blackheath / Oldhaven Beds sits beneath the large village of Meopham and an area of Claygate Beds sits west of the neighbouring village Meopham Green. Soils across the character area are silty, with loam to clay across high areas.

The topography is gently undulating with clear views across the immediate landscape and occasional wider views from the main road towards the residential settlements of Istead Rise and New Barn. The dominant land use is agricultural, with a mixture of grazed pasture and arable use. Small clumps of woodland, neglected orchards and commercial horticulture exist in parts. There is a presence of horse related activity scattered throughout the landscape.

Field shape and size differs, with a neat pattern of small square fields in the south and broader irregular shaped fields to the north. Field boundaries are distinctly formed by native hedgerows, with hedgerow trees.



The large village of Meopham is located to the north of the area, with Meopham Green located at the centre of the area and Culverstone Green to the far south. Traditional architecture surrounds village greens in both Meopham and Meopham Green, providing a strong sense of place and local vernacular. All three settlements comprise dense clusters of buildings that have formed along the A227 that runs from north to south and links all three villages. In addition the small recent settlement of South Street is located to the north-east.

Small traditional clusters of isolated farmsteads can be found to the east and west. Small traditional Victorian red brick architecture and elements of flint are common, reflecting their locality within the Kent landscape. Meopham Windmill, located along Wrotham Road, provides a unique and

### Key Characteristics

- Gently undulating topography with a mixture of arable and pasture farmland
- Neat pattern of small square fields in the south
- Broader irregular shaped fields to the north
- Narrow lanes and roads lined with hedgerows
- Three large settlements located along A227 running east and west
- Traditional architecture surrounding village greens provide local vernacular



traditional attraction within the area. Overhead wires run across the landscape near the small settlement of Henley Street.

The A227 is the areas largest highway and acts as a busy link between the north and south. Narrower, winding, hedge lined roads and lanes run east and west from the A227 into the adjacent landscape.



### Condition: Good



The pattern of landscape elements is coherent, with few visual detractors. Established hedgerows and small woodland clumps limit the visual impact of detractors. Hedgerows are native and in good condition, providing ecological corridors along field boundaries. Woodland clumps are mostly native and mature and vary in condition, whilst the remains of orchards are in poor condition. In general the ecological integrity of the area varies.

Both Meopham and Meopham Green have Conservation Areas at their centres with traditional buildings and village greens. In

general the uses of the landscape are traditional, however the quality of the landscape and land development to the south is of a lower quality than that to the north. Taking into consideration the traditional architecture, land use, coherent pattern of elements and the lack of visual detractors the condition of the landscape can be assessed as being good.

### Sensitivity: Moderate

The key characteristic elements of the landscape are distinct, providing coherency and a strong sense of place within the landscape. Although woodland is restricted to small woodland clumps, hedgerows that run along field boundaries are historic and distinct. Both the settlements of Meopham and Meopham Green have distinct traditional village centres. In addition, traditional vernacular architecture can be found scattered across the landscape. The other two remaining settlements have more recent architecture that is less in keeping with the local vernacular. Strength of character and visibility are moderate, providing a moderate sensitivity overall.



### Guidelines: Conserve and Reinforce

The key landscape elements characteristic of the Meopham Downs should be conserved and reinforced.

- Conserve and reinforce the traditional landscape structure and where necessary introduce new elements they should respect and enhance the pattern.
- Conserve characteristic narrow winding lanes and dense native hedgerows.

- Conserve traditional character of built environment by drawing on traditional building materials and techniques for new development.
- Reinforce village identity, keeping villages distinct and separate from one another.
- Reinforce the enclosure of settlements within wooded areas.
- Conserve and reinforce broadleaf woodland cover and wooded edges to arable plateau.
- Encourage the use of local produce to support traditional land uses such as orchards.
- Explore new horticultural land uses.
- Conserve and reinforce agricultural land use.

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

Sensitivity

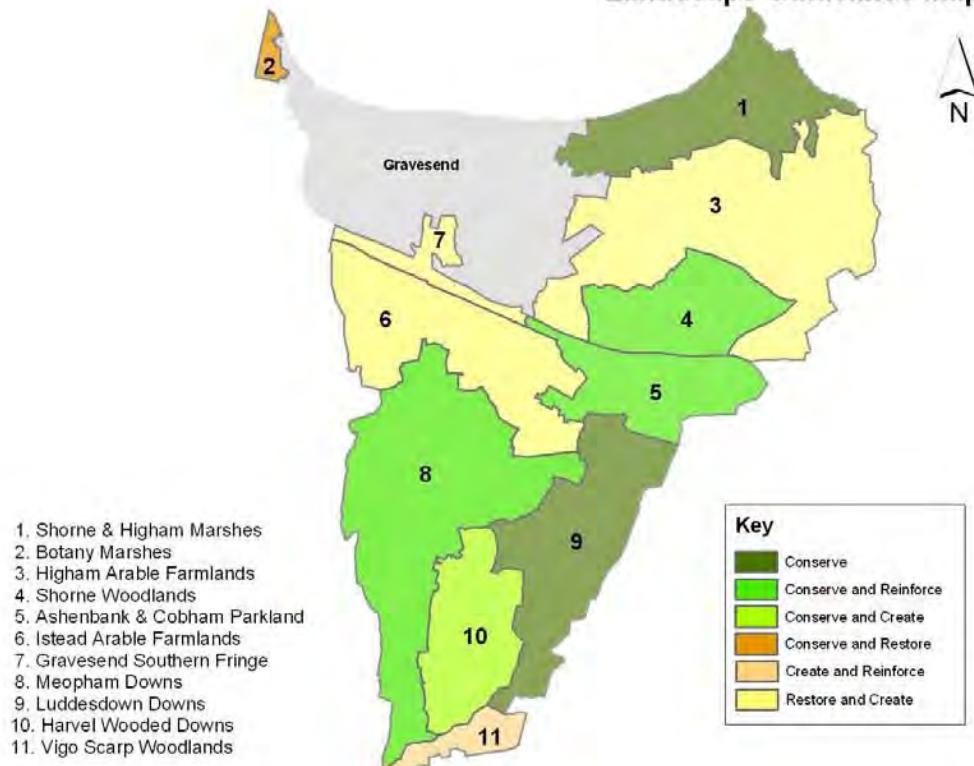
## Landscape Character Generic Guidance

This section provides, firstly, a summary of the overall landscape type of each of the identified character areas, together with its overall condition, sensitivity and guidelines. Secondly, generic landscape issues are identified across each broad landscape types found in the Borough, and, lastly, broad guidelines are provided that should be applied to types of development. Each should be read in conjunction with the guidelines for the character area concerned.

### Summary of Landscape Character

Ref	Character Area	Condition	Sensitivity	Guidelines
1	Shorne and Higham Marshes	Good	High	Conserve
2	Botany Marshes	Moderate	High	Conserve and Restore
3	Higham Arable Farmlands	Poor	Moderate	Restore and Create
4	Shorne Woodland	Good	Moderate	Conserve and Reinforce
5	Ashenbank and Cobham Parkland	Good	Moderate	Conserve and Reinforce
6	Istead Arable Farmlands	Poor	Moderate	Restore and Create
7	Gravesend Southern Fringe	Poor	Moderate	Restore and Create
8	Meopham Downs	Good	Moderate	Conserve and Reinforce
9	Luddesdown Downs	Good	High	Conserve
10	Harvel Wooded Downs	Moderate	Moderate	Conserve and Create
11	Vigo Scarptop Woodlands	Moderate	Low	Create and Reinforce

Landscape Guidelines Map



## Generic Issues

The assessment identifies some common issues across the landscape character areas. These are summarised below and, where appropriate guidelines are provided.

### Marshland Landscapes

Forming part of the Greater Thames Estuary, the marshes to the north of the Borough consist of grazing marsh segregated by a network of ditches and waterways. There is very little development and no roads. Access is based on footpaths and tracks that are raised on flood defences and counterwalls. The marshes support a limited variety of vegetation, with areas of scrub and reeds along waterways. As well as the lack of vegetation and very few trees, the marshes are characterised by the flat topography and extensive views across the River Thames. Flood defence strategies for the River Thames are likely to be the major issue that could affect the future management of the marshlands.

#### Guidelines:

- Appropriate proposals that balance the need for effective Thames flood defence mechanisms and enable the management of grazing marsh to maximise both landscape and biodiversity benefits should be supported.
- Conserve and enhance the historic character of areas of traditional grazing/saltmarsh and their distinctive network of ditches (inc. riparian vegetation) and other characteristic features such as flood defences, counterwalls, and drove tracks. Arable land reversion should be avoided and opportunities taken to revert remaining pockets of arable land to grazing marsh.
- Encourage the retention and reinstatement of traditional timber wing fencing and gates, together with smaller sporadic features like sheepfolds/washes, footbridges etc.
- The open character of most marshland landscapes accentuates the visual impact of many proposals over a wide distance as compared with more enclosed landscape types. Avoid proposals that can result in the interruption of views of large open skies or horizons, or impinge on the undeveloped quality of marshland.
- Where the urban fringe has significantly reduced the quality and rural character of these areas, the landscape would benefit from screening using appropriate wetland species (i.e. reeds) on adjacent non-marshland areas. Where appropriate, use ditches and earth banks to mimic characteristic flood banks.

### Arable Landscapes

Forming part of the North Kent Plain and lying upon the fine loam soils found between the London Clay underlying the Greater Thames Estuary to the north and the North Downs chalk to the south, these areas are amongst some of the most productive agricultural areas in Kent. Large areas are used for arable crops, with occasional shelterbelts or hedgerow lanes as a sign of former land uses as orchards or hop gardens. Trees are rarities here and the small clumps that do exist help to mark the location of isolated churches and farmsteads. Many public footpaths cross the agricultural landscape and form important links between urban and rural areas, and woodlands and marshlands. Pylons and infrastructure are highly visible in these open landscapes.

#### Guidelines:

- In order to maintain the traditional fabric of these areas in continued agricultural use, appropriate proposals to encourage these activities should be supported.
- To maintain the economic viability of this pivotal land use, fragmentation of landholdings should be avoided as far as possible.
- These farmland landscapes are generally in moderate or poor condition where the arable landscape dominates. Opportunities should be sought to enhance natural features such as the enclosure pattern to improve landscape structure.

- Opportunities should be sought to improve access networks through the arable landscape recognising the vital role they play in linking urban areas to the countryside.
- Where open field patterns exist, the built environment is more obvious, particularly at the urban fringe. Care should be taken in the planning and design of proposals both on the urban edge, within rural villages and the wider character areas. These include the enhancement of the landscape through the application of appropriate design through the planning process and land management initiatives.
- Opportunities to relocate cables underground and reduce the impact of pylons on the landscape should be supported.

### **Dry Valleys and Downs**

The North Downs escarpment runs to the south of the Borough. Within the Borough, the broad dip slope gradually drops towards the Thames. The feature that gives unity to the character of the North Downs landscape is the strong chalk topography and the rolling downland. This strong landform is emphasised further by the pattern of woods and interlocking hedgerows. Land use is dominated by traditional downland grazing. It is a rural landscape with scattered flint-walled houses and farmsteads. Settlements are mainly traditional villages, comprising clusters of dwellings often located within valleys.

#### **Guidelines:**

- Many of these landscapes contain a rich diversity of valuable habitats contributing to biodiversity, including, coppice and mixed native woodlands and chalk grassland that should be conserved and enhanced.
- Dry valleys are distinct features of the natural landscape that should be conserved. The steep valley sides and numerous woodland blocks create a landscape of enclosure.
- The nature of traditional settlements and farmsteads located within valleys should be maintained and expansion of these villages should be avoided.

### **Trees and Woodland**

Trees and woodland can be found throughout the Borough, ranging from downland woodland on the chalky dipslopes and valley sides to those on the more acidic and heavier soils. Elsewhere large veteran trees stand in historic parkland, such as around Cobham. The repeated felling and re-growth of the coppice cycle has characterised some woodlands for centuries and are strongly representative of cultural and economic activity.

#### **Guidelines:**

- Support appropriate proposals that enable the conservation of landscape character to continue through diverse woodland/forestry management practice.
- Important woodland and trees within the landscape, especially ancient semi-natural woodland should be protected, appropriately managed and, where possible, expanded and enhanced. Veteran trees should be protected and appropriately managed.
- At planted ancient woodland sites, explore opportunities to plant appropriate native trees and shrubs as continuous cover to enable pockets of ancient woodland species to spread and flourish. Where appropriate, replace coniferous plantation with native deciduous trees.
- Create ecological networks by linking isolated woodlands.
- New woodland planting should be targeted in areas where there are high concentrations of ancient woodland and designed to buffer and extend these habitats.

## **Urban Fringe**

Urban fringe influence is particularly dominant in the north of the Borough. Pressure on the surrounding countryside is heightened by the Thames Gateway status of the area. Changes to the infrastructure and the use of the landscape, fragmentation in addition to the impact and demand on the surrounding rural landscape for access and recreation are changing the traditional function of these landscapes.

### **Guidelines:**

- Where traditional land uses are no longer appropriate create a new function, structure and identity to landscapes appropriate to their urban edge location and Thames Gateway status.
- Ensure Green Grid principles are embodied in new proposals for these areas.
- Manage access arrangements to balance the need for recreation (including walking, cycling, equestrian), whilst controlling anti-social uses and unauthorised access (including fly tipping).
- Ensure that new development on the urban edge is sensitive to its location adjacent to the rural landscape and creates a positive edge to the built up area.

## **Buildings and settlements**

Many villages of great charm and antiquity exist throughout the Borough. Their conservation is central to overall landscape character. Uncharacteristic built elements in the landscape, particularly in the plot lands, are having a suburbanising effect on traditional rural character. This has the effect of eroding landscape character by degrees and is often beyond control of planning authority.

### **Guidelines:**

- Ensure that proposals respect (but do not extend) the clustered character of settlements and avoid the creation, expansion, or consolidation of more scattered farmsteads and cottages.
- Building materials, layout and style should reflect the local vernacular character as appropriate. Landscape proposals should also reflect local character, using appropriate form, structure and species.

## **Landmark Buildings and Features**

Across the Borough are a large number of buildings and features that have become part of the landscape, frequently occupying isolated, elevated, or open aspects in the landscape. They may be reference points of past activities that remain only in fragmented pockets of the modern landscape. Examples include isolated churches, oast cowls, windmills and perhaps isolated farmsteads. Other landmark features include the memorials, former Thameside defences and built elements associated with historic parklands such as at Cobham Hall.

### **Guidelines:**

- Conserve and enhance landmark buildings and features, together with their setting and views and restore the visual and if possible, the historic integrity in the landscape.
- Conserve and restore features associated with historic parklands, including estate buildings such as lodges, memorials, follies and fencing.

## Generic Guidelines for development types

### All development

- Should submit a site landscape assessment or statement, depending upon the size and type of development. These should provide an analysis of the site and its context and demonstrate how development has responded to the Gravesham Landscape Character Assessment.
- Should relate to settlement pattern – i.e. linear, clustered etc. Consider plot size and shape and the relationship of the buildings within the plot and to each other. Small-scale proposals are more likely to be sympathetic to landscape character.
- Landscapes that have a strong established landscape structure (e.g. field patterns with natural boundaries such as hedges, woodlands, shelterbelts, ditches etc) with a diverse mix of uses should, as a general rule, better accommodate change than simple landscapes with an open structure. Look for targeted opportunities to enclose most landscape types (i.e. create new natural connecting landscape structure), whilst avoiding the opening up of enclosed landscapes.
- Respect local vernacular and distinctiveness when considering massing, form, height, detail, colour and texture, blending innovation with tradition. Use materials in their traditional manner e.g. avoiding prefabricated flint panels.
- Minimise the number of new vehicular accesses and use minimum acceptable width. Access tracks/roads should relate to landform and field patterns, with materials appropriate to the locality.
- The re-use of, or grouping of buildings, is likely to have the least impact on the landscape, as opposed to the isolated positioning of buildings in exposed or prominent locations such as ridgelines or hilltops. Avoid: straight lines or regimented buildings on the settlement edge; extending the linear form of settlements; the creation, expansion, or consolidation of more scattered farmsteads and cottages.
- Protect settlement setting, important views and spaces and avoid intrusion onto ridgelines, prominent slopes, hillsides and tops, open fields and valley sides and bottoms.
- Avoid proposals that would impinge on the sense of undeveloped openness between settlements vulnerable to coalescence.
- Retain key landscape features – e.g. woodland, shaws, hedgerows, orchards, trees, watercourses and ponds. Where possible, extend and buffer key habitats from new developments and intensive agricultural practices.

### Residential

- Generally avoid close board fencing or other suburban features such as walls, gates, lighting, bollards, block paving, concrete kerbs and ornamental planting. Provide the minimum acceptable width access and use timber gates, with a minimal driveway of (normally) bound gravel. Retain vegetation and make use of grass, hedgerow planting and existing natural features.
- Limit domestic curtilage extensions where settlements depend upon the surrounding field pattern, landscape form, cover, or boundary treatment, for their distinctiveness. Where extended, look for opportunities to re-instate traditional landscape features e.g. hedges and avoid over-suburbanising the garden with ornamental plants and structures.

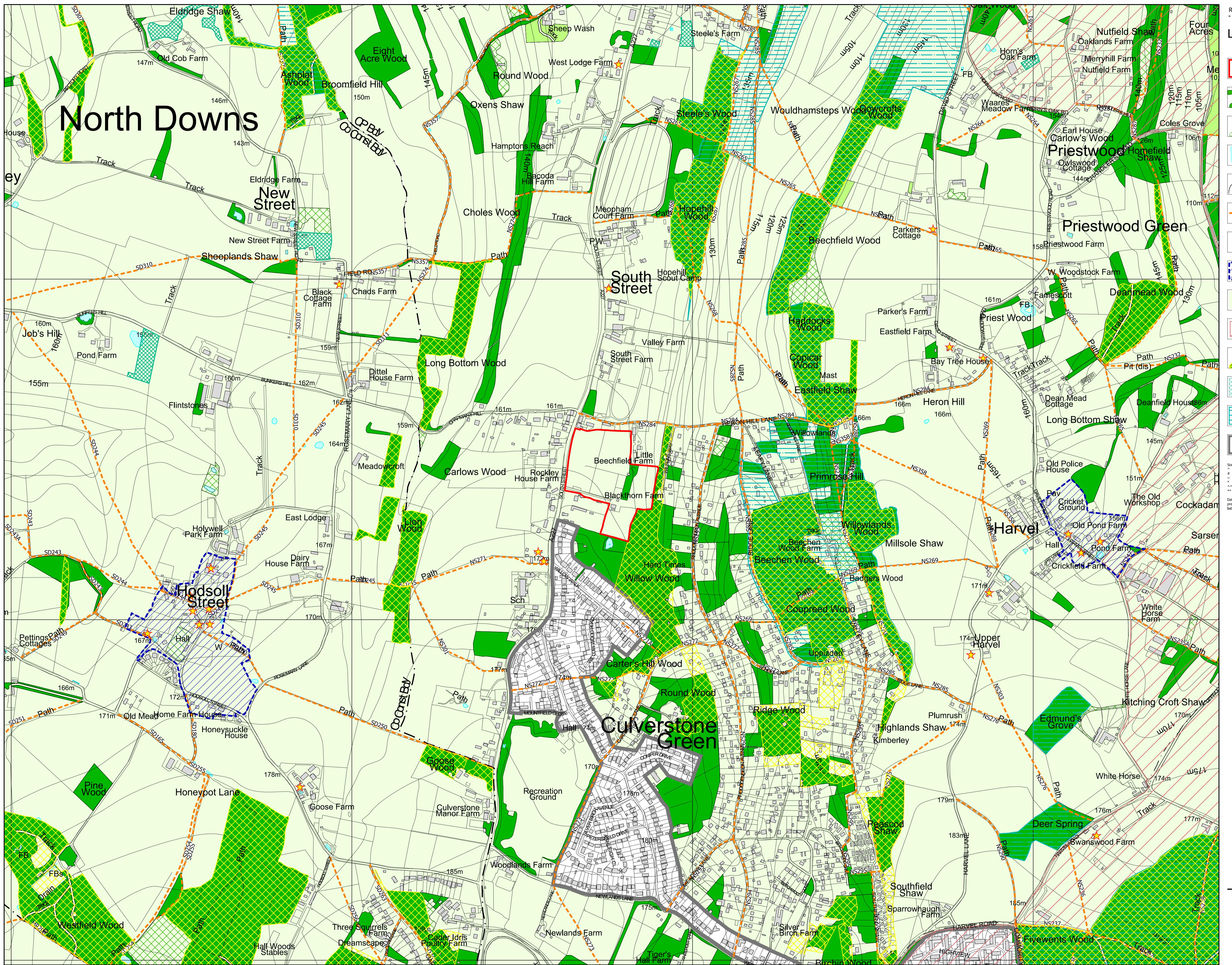
### Commercial (including Agriculture, Equine, Tourism and Leisure)

- Avoid the use of chainlink, weldmesh, close board and other fencing and gates associated with urban industrial sites.

- Use neutral colours for buildings and limit open storage and lighting. Creative use of colour can be used to reduce the apparent scale of larger commercial buildings.
- For new stables (including non-commercial) and ménages/exercise areas, re-use or locate buildings as part of existing building group or in field corners and avoid the proliferation of buildings and other structures. Use natural folds in the landscape, existing vegetation, or copses. Use dark matt colours for stables and surfaces or (preferably) local materials. Black weatherboarding should be used in historic landscapes, historic groups of buildings or on traditionally designed 'barns'. Avoid overgrazing and excessive field sub-division with post and rail fencing/wire/white tape. Look for opportunities to plant hedgerows around and between the fragmented fields (including replacing evergreen belts) and to replace/supplement fencing with hedging.
- Golf course design should work with existing landscape form and pattern, avoiding hilltops, hill and valley sides. Look for opportunities to naturalise their appearance by use of traditional landscape elements such as hedgerows, shelterbelts, shaws, woodland and large areas of rough grassland. Consider the colours and textures of grass seeding. Reintroduce native planting in intensively farmed areas. Consider English Heritage guidance on golf in historic landscapes. Avoid floodlighting.

### **Infrastructure**

- New roads often contrast with landscape pattern so design and landscaping should integrate the road with the surrounding landscape and extend beyond the road corridor.
- For highway works and management, conserve hedges, grass verges/banks, trees, walls, bridges and roadside features like finger posts or milestones, whilst avoiding concrete kerbing, standardised 'features', excessive sight-lines and lighting, especially between settlements. Make restrained use of coloured surfaces and road markings.
- For masts, avoid breaking open skylines or intruding into sensitive views. Site on lower slopes against a backdrop of trees.
- With the exception of marshland, flatter large-scale landscapes can generally better accommodate overhead cabling where associated with existing structures. Often, the use of underground cabling will be the most appropriate.



**FIGURE 1**

Project  
Land at Blackthorn Farm,  
Culverstone Green  
Drawing Title  
Site Context Plan

Date 09.06.2025 Scale 1:5,000 @A1  
Project No 333101791 Drawing No LN-LP-01  
Drawn by ML Check by GM  
Revision A

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