



Appendix 12.9 – Green Belt Assessment

12.1 Introduction

- 12.1.1 This Green Belt Assessment has been prepared by Icen Projects ('Icen') in relation to the potential development of Land North of Camer Road, Meopham (the 'Site') on behalf of the McManus Family for up to 730 dwellings, a new two-form entry primary school (Use Class F1), the provision of Public Open Space including sport and recreation facilities, alongside associated access, landscaping, parking, and infrastructure (the 'Proposed Development').
- 12.1.2 The assessment considers the contribution of the Site to the purposes of the Green Belt as set out within the National Planning Policy Framework (NPPF). A sifting exercise is undertaken to understand whether the Proposed Development is 'inappropriate', including consideration as to whether the Site constitutes grey belt land.
- 12.1.3 Consideration of the application of the 'Golden Rules' is examined as appropriate, and as a matter of course, an assessment of the openness of the Green Belt in the Site and its vicinity is conducted to understand to what extent the development of the Site could have on the perception of openness within the Green Belt should this be an applicable consideration.

Site Background

- 12.1.4 The Site is located to the east of Hook Green and to the south-west of Sole Street and is bordered by the Medway railway line to the north, Camer Road to the south-east, and Norwood Lane to the south-west. The northwestern boundary is marked by the rear gardens of the properties along Nursery Road, within the village of Hook Green. Overall, the Site is well-contained.
- 12.1.5 The Site falls within the administrative area of Gravesham, where 78% of the Borough is designated as part of the London Metropolitan Green Belt, and 40% of the Green Belt is either a Ramsar site or part of the Kent Downs National Landscape. The Site has no significant planning policy designation other than its Green Belt status. There are no statutory landscape or ecology designations on site, and no heritage constraints aside from Norwood Farmhouse (Grade II Listed) which is located along Norwood Lane. The Site is also located within Flood Zone 1.
- 12.1.6 The Site predominantly comprises flat, agricultural land. There are no buildings within the Site itself.
- 12.1.7 The Site is within a highly sustainable location. The Village of Hook Green lies immediately to the west of the Site, which is described as a Tier 2 settlement within the adopted Local Plan. The Village of Sole Street lies immediately to the north-east, beyond the railway line. This is a smaller village and is described as a Tier 4 settlement within the adopted Local Plan. Both settlements contain train stations that provide direct services to London and the Medway Towns and are within walking

distance from the Site. There are also a number of bus stops serving commuter, school and local services, and a number of shops, services and facilities within walking distance.

- 12.1.8 The Site was identified as a potential site allocation (GBS-E) for approximately 520 dwellings within the Regulation 18 version of the Local Plan (2020), which demonstrates that it was considered to be a suitable and sustainable location for development.

12.2 Planning Policy Context

National Planning Policy Framework (December 2024, corrected Feb 2025)

- 12.2.1 Section 13 of the NPPF concerns the protection of Green Belt land. Paragraph 142 highlights that the Government attaches great importance to Green Belts, adding that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

- 12.2.2 Paragraph 143 defines the five purposes of the Green Belt, which are:

“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.”

- 12.2.3 Paragraph 145 of the NPPF notes that once Green Belts have been defined, they should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. It notes that strategic policies should have regard for the intended permanence in the long term of Green Belt boundaries. Paragraph 149 notes that, when defining Green Belt boundaries, plans should, amongst other criteria, not include land which it is unnecessary to keep permanently open.

- 12.2.4 Paragraph 153 highlights that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 adds that:

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt... ‘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.”

12.2.5 Paragraph 148 sets out that *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework”.*

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

12.2.7 Paragraph 154 notes that certain forms of development are not inappropriate in the Green Belt. Paragraph 155 goes on to note that ‘development of homes, commercial and other development in the Green Belt should 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.”

12.2.8 Paragraph 156 goes on to state that where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the

Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

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

b) necessary improvements to local or national infrastructure; and

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

12.2.9 Paragraph 158 states that *"development which complies with the Golden Rules should be given significant weight in favour of the grant of permission"*.

12.2.10 Paragraph 159 notes that 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"*.

National Planning Practice Guidance

12.2.11 Additions to the Green Belt Planning Practice Guidance ('PPG') were published in February 2025. The PPG provides guidance on how to assess the contribution of the Green Belt land to the purpose of the Green Belt, where relevant to identifying grey belt land.

12.2.12 Paragraph 005 provides further guidance on how the contribution of land should be assessed against the purposes relevant to identifying grey belt land, purposes a, b and d. In relation to purpose a, it notes that villages should not be considered large built-up areas and that purposes b and d relate to towns and not villages.

12.2.13 Paragraph 008 highlights that Green Belt assessments should also consider the extent to which release or development of Green Belt (including but not limited to grey belt land) would fundamentally

undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.

12.2.14 The PPG also provides guidance on the identification of sustainable locations, as well as the application of the Golden Rules. Paragraph 013 notes that judging the openness of Green Belt land depends on the circumstances of the case with following factors to consider which include but are not limited to:

- 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.

12.2.15 Paragraph 014 reiterates Footnote 55 of the NPPF, which states that if development is considered to be not inappropriate development on previously development land or grey belt, then it is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including its openness.

12.3 Evidence Base Studies

12.3.1 In this section we consider the relevant Green Belt studies that have been undertaken by and on behalf of Gravesham Borough Council.

12.3.2 Gravesham's Green Belt Study Stage 1 was undertaken in 2018, with a Stage 2, prepared by LUC in 2020, pre-dating the Green Belt PPG updates. For reference, the Studies use Purpose 1 to refer to Purpose (a), Purpose 2 to refer to Purpose (b) and Purpose 4 to refer to Purpose (d). Within the Stage 1 Study, the Site is identified as falling within Parcel 19 (Land East of Hook Green) within the Stage 1 Assessment. The Site makes up approximately 25% of the overall area of the parcel, which extends further to the south-east away from the settlement boundaries and into the Kent Downs National Landscape.

12.3.3 Parcel 19 is considered to make Minimal/ No Contribution to Purpose (a), as the area does not abut either Gravesend or Strood so it does not directly check the unrestricted sprawl of large built-up areas.

12.3.4 The Study breaks Purpose 2 down into two parts: to prevent neighbouring towns merging and to prevent other settlements in the Green Belt from merging. In preventing neighbouring towns from merging, Parcel 19 is considered to make Minimal/ No Contribution), as the parcel does not lie directly between Gravesend and Strood. Therefore, it does not play a role in preventing neighbouring

towns from merging into one another or maintaining the break in built development between them. In relation to preventing other settlements from merging, the parcel is considered to make a contribution, noting *“The western and north western parts of the parcel are particularly important in maintaining the separation between Hook Green and Meopham Green/Sole Street as the gaps between them are relatively narrow”*. However, this study pre-dates the updated PPG, which confirms that Purpose (b) only relates to the merging of towns, not villages.

12.3.5 Purpose (d) is not assessed. However, it is stated at Paragraph 28 of the Assessment that:

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

12.3.6 It can therefore be concluded that Purpose (d) is not relevant in this case.

12.3.7 The Stage 2 assessment confirms the methodology set out within Stage 1, with regards to how to assess Purposes (a), (b) and (d). It also includes assessments of harm, however, this analysis is not relevant to whether a site is considered to meet the grey belt definition within the NPPF.

12.3.8 The assessment generally focusses on small parcels immediately adjacent to settlements, and part of the Site (the paddock area and adjoining land to the north-west is assessed under Parcel HG2. The remaining land is assessed under HG3. Both parcels were assessed as making a limited or no contribution to Purposes (a), (b) and (d).

12.4 Contribution of the Site to the Green Belt

Methodology

12.4.1 The NPPF does not attach a hierarchy to the Green Belt purposes and it is assumed that each purpose is of equal importance. The National Planning Policy Guidance provides direction on how to assess the contribution of Green Belt land in relation to purposes a, b and d.

12.4.2 The most relevant non-policy guidance in relation to Green Belt Assessment is published by the Planning Advisory Service ('PAS'), Planning on the Doorstep: the Big Issues – Green Belt (February 2015). This methodology has therefore also been informed by the PAS guidance, as well as through

considering other evidence base reports which have been examined in public as part of Local Plan Examinations, and found acceptable.

12.4.3 There are two components to consider in relation to Green Belts: the value (contribution) of the land to the Green Belt in relation to the five purposes; and the potential harm to the purposes of the Green Belt of development of that land. In considering both the value and potential harm, we have taken other paragraphs within the NPPF into account, which, while not strictly policy, aid in expanding the concept of the value of the Green Belt. This includes paragraph 148 which refers to previously developed land and land that is well-served by public transport. Paragraph 149 refers to the requirement to not include land within the Green Belt which is not necessary to be kept open permanently, and sets out that Green Belt boundaries should be clearly defined, using physical features that are readily recognisable and likely to be permanent. Paragraph 151 includes commentary about positive enhancements to the beneficial use of Green Belts, such as providing access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

12.4.4 Harm to the purposes of the Green Belt as a result of inappropriate development should be considered within the 'any other harms' category as set out within NPPF paragraph 153. It must also be considered when assessing whether development complies with the exceptions listed in paragraph 154(b and h) and 155(a).

12.4.5 The PAS advice note states that some of the five Green Belt purposes will be more relevant, or important, than others. Below, we consider the five purposes in more detail.

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

12.4.6 The purpose refers to 'large built-up areas'. Paragraph 005 of the PPG notes that villages should not be considered large built-up areas, and this purpose does therefore not relate to villages, hamlets, or washed-over settlements (noting, however, that sprawl anywhere is an undesirable characteristic). Large built-up areas are therefore considered to comprise towns or cities.

12.4.7 The PAS advice notes that the terminology of 'sprawl' comes from the 1930s when Green Belt was conceived, and it poses the question of whether development that is planned positively through a Local Plan, and well designed with good masterplanning, constitutes sprawl. The early Green Belt helped prevent ribbon development which was prevalent at the time (i.e. single plot depth development to one of either side of existing or new roads, often extending out of the settlement into the countryside). Therefore, ribbon development is one way in which sprawl can be defined. Sporadic or dispersed development on the edge of a settlement could also be seen as sprawl, as can development which extends beyond a clear settlement boundary following a physical element, such as a river or main road. 'Untidy' or scattered development, incongruous patterns of development, and areas of unplanned expansions over a period of time, could also be considered as sprawl. This

is reflected in paragraph 005 of the PPG which notes land as having a strong contribution to purpose a as resulting in an *“incongruous pattern of development (such as an extended “finger” of development into the Green Belt)”*.

12.4.8 However, sprawl can similarly be contained, or the appearance of sprawl can be mitigated by, amongst others, maintaining a clear separation between the settlement and the countryside beyond. In this regard, the NPPF notes in paragraph 149(f), that Local Plans should define Green Belt boundaries *“clearly, using physical features that are readily recognisable and likely to be permanent”*. This is reinforced within the PPG which notes land as having a strong contribution to purpose a as lacking *“physical feature(s) in reasonable proximity that could restrict and contain development”*.

12.4.9 Criteria to consider in relation to the contribution of the land to purpose a:

- The land’s relationship to a large built-up area, including its degree of containment by existing development and presence of other urbanising influences;
- Degree of openness, and how much built development already occurs;
- The current character of the settlement or Green Belt edge, and whether it follows a clearly identifiable and defensible boundary; and
- The occurrence of other potential defensible boundaries, and whether they are clearly identifiable, permanent, regular, amongst others.

12.4.10 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with Table 1. This aligns with the illustrative features identified within paragraph 005 of the PPG. The harm to the purpose as a result of development of the land is judged in accordance with Table 2.

Table 1: Contribution to Purpose a

Contribution	Description
Strong	Land which makes a strong contribution to purpose a is likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following: - Be adjacent or near to a large built up area; and - If developed, result in an incongruous pattern of development (such as an extended “finger” of development). Land which makes a strong contribution is likely to have existing very strong boundaries and/or no physical features to form a new settlement edge. It is likely to be clearly outside of the existing settlement, have little to no containment and/or be a very open landscape. It is also likely that there is no or limited sprawl evident nearby.

Contribution	Description
Moderate	Land which makes a moderate contribution to purpose a is likely to be adjacent or near to a large built-up area, but include one or more of the features that weaken the land's contribution to purpose a, such as (but not limited to): - Having physical feature(s) in reasonable proximity that could restrict and contain development; - Be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development; - Contain existing development; and/or - Being subject to other urbanising influences. Land which makes a moderate contribution is likely to have existing clearly identifiable boundaries, however, other potential boundaries also exist. It is likely to be mostly open with some containment and/or have some urbanising influences. Some sprawl may be evident near the settlement, but is not connected to it.
Weak or None	Land which makes a weak or no contribution to purpose a is likely to: - Not be adjacent to or near to a large built-up area; or - Be adjacent to or near to a large built-up area, but is containing or largely enclosed by significant existing development. Land which makes a weak contribution towards purpose a is likely to be adjacent to or in proximity to a large built-up area. It is likely to have a weak existing boundary and strong potential new boundaries. It is likely to be well contained and have existing urbanising influences. Some sprawl is likely to occur in proximity. Land which makes no contribution towards purpose a is likely to not be adjacent to or in proximity to a large built-up area. If it is adjacent to a large built-up area, it is likely that it is very well contained and that there is no clear distinction between development within the Green Belt and that outside of it. There are likely to be no clearly identifiable existing boundaries, but strong potential boundaries. It is likely that sprawl adjoins the settlement.

Table 2: Harm to Purpose a

Harm	Description
High	Development which would cause high harm to purpose a is likely to be perceived as sprawl without clear boundaries, and would not be well related to the settlement. It is likely to include ribbon and scattered development, or be particularly incongruous with the existing settlement form. It is likely that no edge to the settlement would be identifiable.
Moderate	Development which would cause moderate harm to purpose a is likely to constitute sprawl, but the extent would be minor, and some containment would occur. Development might be well related to existing sprawl, and therefore have a limited additional impact. Development might be well related to the settlement and well planned, but there may be no clearly identifiable boundaries.

Harm	Description
Weak or None	Development which would cause limited harm to purpose a is likely to be planned and would form an extension to the existing large built-up area. It is likely that a clearly identifiable new settlement boundary would be present. Development would be regular in form and at least partially enclosed. Development which would cause no harm to purpose a is likely to not adjoin a large built-up area. Development which does adjoin a large built-up area would be well contained on all sides or could consolidate existing sprawl. It is likely to create an identifiable settlement edge.

Purpose b: To prevent neighbouring towns from merging into one another

- 12.4.11 This purpose specifically refers to towns, not villages, as highlighted in paragraph 005 of the PPG.
- 12.4.12 The nature and size of the perception of separation are important considerations in determining the role that a land parcel plays in maintaining separation between towns. The PAS guidance states that when assessing this purpose, *“a ‘scale rule’ approach should be avoided. The identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land between must be taken into account”*.
- 12.4.13 In cases where coalescence has already occurred elsewhere between the towns, it is necessary to consider the importance or value of maintaining the remaining separation. If the towns are already indistinguishable from each other, then there is little value in maintaining a ‘token’ area of separation, if it would either not be meaningful or functional, or if it is considered that there is no need to retain separation for the sake of it.
- 12.4.14 Criteria to consider in relation to the contribution of the land to purpose b:
- The perceptual distance between towns;
 - Intervisibility, or visual separation;
 - The role of landform or landcover in ensuring separation;
 - The individual characters of the towns;
 - Identifiable settlement boundaries or separating features, such as motorways for example; and
 - The effect of development on the perception of transition between towns, i.e. would you clearly leave one town and enter the next if the land were to be developed.
- 12.4.15 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with Table 3. This aligns with the illustrative features identified within paragraph 005 of the PPG. The harm to the purpose as a result of development of the land is judged in accordance with Table 4.

Table 3: Contribution to Purpose b

Contribution	Description
Strong	Land which makes a strong contribution to purpose b is likely to be free of existing development and include all of the following features: - Form a substantial part of a gap between towns; and - The development of which would result in the loss of visual separation of towns. Land which makes a strong contribution to purpose b is likely to be perceived as occupying the whole or vast majority of the physical gap between towns which are currently separate. The land is likely to form the last area of separation between towns which have already merged elsewhere, and where the land perceptually functions as a separating feature, where judged necessary. Development of the land is likely to have the consequence of perceptually merging the towns or substantially reducing their separation to the point that the separate identities of the towns are no longer recognisable.
Moderate	Land which makes a moderate contribution to purpose b is likely to be located in a gap between towns, but include one or more features that weaken the land's contribution to purpose b, such as (but not limited to): - Forming a small part of the gap between towns; and/or - Being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural elements or topography that preserve visual separation. Land which makes a moderate contribution to purpose b is likely to form part of a wider perceived gap between towns. It is likely that some boundaries or features occur which would ensure separation. Towns are likely to have clear boundaries at the moment, but potentially new clear boundaries also exist. There is likely to be limited coalescence that has already taken place, and the land prevents the perception of further coalescence. Development on the land would likely reduce the perceived separation of towns, but the separate identities of the towns would remain recognisable.
Weak or None	Land which makes a weak or no contribution to purpose b is likely to: - Not form part of a gap between towns; or - Does form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation. Land which makes a weak contribution to purpose b is likely to form part of a substantial gap between towns which are clearly separate. It is likely that there are several clearly separating features occurring between the towns. In some cases, much coalescence has already occurred, and additional low levels of coalescence would not change the overall separate identities of the towns. It is likely that development on the land would not materially affect the perceived separate identities of the towns. Land which makes no contribution to purpose b is likely to not be located between two towns. Where the land is located between two towns, it is likely that the distance between the towns is significant, and the two towns remain clearly identifiable. Alternatively, the land occupies a gap which is judged to provide no meaningful or functional separation between towns which have already merged.

Table 4: Harm to Purpose b

Harm	Description
High	Development which would cause high harm to purpose b would likely cause towns which are currently separate, to coalesce, either physically or visually. Development would likely occupy the final identifiable area of physical or visual separation between towns which have already coalesced.
Moderate	Development which would cause moderate harm to purpose b would likely bring towns closer to each other, but clear boundaries or clearly identifiable intervening undeveloped land will ensure their perceived separation and separate identities are maintained. Development will likely increase coalescence where it already occurs and substantially reduce the clear perception of separation.
Weak or None	Development which would cause limited harm to purpose b would likely bring towns closer to each other, but clear boundaries and clearly identifiable, large areas of intervening undeveloped land will ensure their separation and separate identities are maintained. Development would likely lead to coalescence where towns are already not separately identifiable. Development which would cause no harm to purpose b is likely not be located within a gap between towns, or would not lead to any perception of coalescence.

Purpose c: To assist in safeguarding the countryside from encroachment

- 12.4.16 The PAS advice notes that, presumably, all Green Belt assists in safeguarding the countryside from encroachment, making the purpose difficult to use to distinguish the contribution of different areas. The PAS also notes that the most useful approach is to look at the difference between urban fringe – land under the influence of the urban area; and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.
- 12.4.17 Countryside is not defined within the NPPF, and in planning policy terms it most often refers to land outside of the settlement boundary. If the fundamental aim of Green Belts is to prevent urban sprawl and keep land permanently open, then it follows that countryside is undeveloped, and open.
- 12.4.18 This purpose therefore relates to the character and function of the landscape, to an extent, and the extent to which it displays a 'countryside' character. For the purposes of this assessment, land that is clearly countryside is considered to be rural, with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields. On the other side of the land use and openness scale are urban areas, and clearly identifiable settlements. However, the use and character of land often falls

between these two sides, and is often described as having a semi-rural/urban, urban fringe, or settlement edge character.

- 12.4.19 The second main consideration relates to the extent of encroachment, and whether any containment exists which would limit the actual or perceptible encroachment. Encroachment into a landscape with no clearly defined boundary features to curtail further development or encroachment, will have a larger impact on this purpose than encroachment into a landscape which is separated from the wider adjoining countryside by clearly identifiable features. A planned urban extension on the periphery of a settlement is likely to encroach on the wider countryside, and consideration of this purpose should assess the ability of the land parcel to accommodate change and its impact on the wider countryside.
- 12.4.20 Criteria to consider in relation to the contribution of the land to purpose c:
- Land use on site;
 - Character of site;
 - Effect on character of site from adjoining land uses;
 - Connection to adjoining settlement, and connection to adjoining countryside; and
 - Occurrence of clear boundaries between the settlement and the countryside.
- 12.4.21 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with Table 5. The harm to the purpose as a result of development of the land is judged in accordance with Table 6.

Table 5: Contribution to Purpose c

Contribution	Description
Strong	Land which makes a strong contribution to purpose c is likely to be clearly rural and undeveloped. The existing settlement edge is likely to be very strong and no other equally strong potential boundary exists in the area.
Moderate	Land which makes a moderate contribution to purpose c is likely to be predominantly rural and undeveloped with some urbanising influences. The existing settlement edge is clearly identifiable, but other potential clearly identifiable boundaries occur in the area.
Weak or None	Land which makes a weak contribution to purpose c is likely to be mostly developed and/or is not characteristic of rural countryside due to urbanising influences. The settlement edge is either well defined or not well defined, however, clearly identifiable potential boundaries occur within the area. Land which makes no contribution to purpose c is likely to be clearly developed. Strong boundaries exist which would form a new settlement edge and potential Green Belt boundary.

Table 6: Harm to Purpose c

Harm	Description
High	Development which would cause high harm to purpose c would likely occur on open, undeveloped land. Development would likely not be clearly adjoined to the settlement, and would not be clearly separated from the countryside. There would be no clear boundary between the settlement and the countryside, and the wider Green Belt would be vulnerable to further development. The development would likely affect the rural character of the wider Green Belt.
Moderate	Development which would cause moderate harm to purpose c would likely occur on mostly undeveloped land, but would be adjoined to the existing settlement. Some extension of the settlement into the countryside would occur, but it is likely that clearly identifiable boundaries will create a firm boundary between the settlement and the wider countryside. There will be no significant effect on the wider Green Belt, which will remain countryside.
Weak or None	Development which would cause limited harm to purpose c would likely occur on land which contains much existing development, and which cannot be described as rural. Development will form an extension to the settlement and will be well contained from the wider Green Belt by clearly identifiable boundaries. Development which would cause no harm to purpose c would likely be located on land which is mostly developed and which does not reflect rural or countryside characteristics. Development will clearly form part of a settlement, and will not extend the settlement into the adjoining open countryside.

Purpose d: To Preserve the Setting and Special Character of Historic Towns

- 12.4.22 The PAS advice notes that this purpose is generally accepted as relating to very few settlements in practice. This is reinforced through paragraph 005 of the PPG which notes that where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. In most towns there already are more recent developments between the historic core, and the countryside between the edge of the town.
- 12.4.23 We also note that the purpose refers to historic towns, so this excludes modern towns, and also smaller settlements such as villages, as highlighted in paragraph 005 of the PPG. That does not mean that the character or openness of land around a historic village should not be preserved, but simply that it is not the purpose of the Green Belt to do that.
- 12.4.24 Criteria to consider in relation to the contribution of the land to purpose d:
- Is the settlement a historic town;
 - Does the land contribute to the setting or character of the historic town;
 - Is there modern development between the land and the historic town (i.e. usually the historic core), which affects the role of the land within the Green Belt;
 - Conservation Area Appraisals and guidance;

- Visual relationship between historic core and wider countryside; and
- Views to landmark buildings in historic core.

12.4.25 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with Table 7. This aligns with the illustrative features identified within paragraph 005 of the PPG. The harm to the purpose as a result of development of the land is judged in accordance with Table 8.

Table 7: Contribution to Purpose d

Contribution	Description
Strong	Land which makes a strong contribution to purpose d is likely to be free of existing development and to include all of the following features: - Form part of the setting of a historic town; and - Make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town. Land which makes a strong contribution to purpose d is likely to comprise the whole, or a principal part of, the visual or physical setting of a historic town. The land is likely to be located adjacent to the historical parts of the town.
Moderate	Land which makes a moderate contribution to purpose d is likely to form part of the setting and/or contribution to the special character of a historic town but include one or more features that weaken its 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; and/or - Not having an important visual, physical, or experiential relationship to historic aspects of the town. Land which makes a moderate contribution to purpose d is likely to form part of the setting of a historic town. It is likely that there is very limited intervening modern development, and that there is a direct relationship between the land and the historic elements of the town.
Weak or None	Land which makes a weak or no contribution to purpose d is likely to: - Not form part of the setting of a historic town; or - Have no visual, physical, or experiential connection to the historic aspects of the town. Land which makes a weak contribution to purpose d will adjoin a historic town. There may be views of historical elements from the land, which may contribute to the wider setting. However, it is likely that there is no direct association between the historical town and the land. Land which makes no contribution to purpose d may or may not adjoin a historic town. Where it does adjoin a historic town, the historic core is likely to be separated from the land by much intervening modern development. There is

Contribution	Description
	likely to be no visual connection of importance (i.e. beyond incidental) between the land and the historic core of the town.

Table 8: Harm to Purpose d

Harm	Description
High	Development which would cause high harm to purpose d would likely sever the connection between a historic town and its setting, or would significantly affect the special character of the historic town due to the loss of the open land.
Moderate	Development which would cause moderate harm to purpose d would likely intrude on the connection between the historic town and its setting, but the setting and special character would be maintained.
Weak or None	Development which would cause limited harm to purpose d would likely result in a very minor incursion into the setting of a historic town. Development would likely result in a minor alteration to an element which contributes to the special character of the historic town. Development which would cause no harm to purpose would either not be near a historic town, or there would be no or very limited intervisibility between the development and the historic town. The development would maintain all elements which contribute to the setting or special character of the historic town.

Purpose e: To assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 12.4.26 The PAS advice sets out that when a Council decides to release Green Belt land, it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land for development. If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.
- 12.4.27 Previously developed land within the Green Belt, especially where the openness is affected, is, however, considered to perform less of a Green Belt function than greenfield sites.
- 12.4.28 Criteria to consider in assessing harm caused by development within the Green Belt in relation to purpose e:
- Is the land already developed;
 - Does the development affect its openness; and
 - Can the land be considered derelict.

12.4.29 The harm to the purpose as a result of development of the land is judged in accordance with Table 9.

Table 9: Harm to Purpose e

Harm	Description
High	Development which would cause high harm to purpose e is likely to be on undeveloped, open land. Evidence shows that there is sufficient derelict land or land within the settlement to accommodate the Council's required growth.
Moderate	Development which would cause moderate harm to purpose e is likely to be on partially developed land, but may extend beyond the existing built area. Evidence shows that there is sufficient derelict land or land within the settlement to accommodate the Council's required growth.
Weak or None	Development which would cause limited harm to purpose e is likely to be in an area where evidence shows that there is insufficient derelict land or land within the settlement to accommodate the Council's required growth. Development is on open and undeveloped land. Development which would cause no harm to purpose e is likely to be in an area where evidence shows that there is insufficient derelict land or land within the settlement to accommodate the Council's required growth. Development is on land which is already developed and not open, or on derelict land within the Green Belt.

Green Belt Boundaries

12.4.30 The consideration of the effectiveness of the existing Green Belt boundaries is also taken into consideration in the assessment of the land. The NPPF states that boundaries should be defined *"clearly, using physical features that are readily recognisable and likely to be permanent"*.

12.4.31 Where Green Belt boundaries follow the rear of existing housing on the edge of a settlement, these can lack visual containment and result in a poor relationship between the edge of the settlement and the adjoining land parcel. Where the boundary along rear gardens on a settlement edge is more irregular or complicated, or where it crosses rear gardens, it is likely the case that the Green Belt boundary is not well defined along clearly identifiable features. In such cases, consideration should be given to whether an improved boundary could be provided through planned expansion.

12.4.32 Clearly identifiable physical, recognisable, and likely permanent features include:

- Major transport infrastructure, including roads and railways;
- Landscape features including woodland blocks or belts, and watercourses;
- Topography, such as ridgelines; and
- Public rights of way.

12.4.33 Hedgerows, dependent on their character, would usually form a less clearly identifiable boundary, and private roads would form a less permanent feature for a boundary, however, these elements could also be used to align Green Belt boundaries.

12.4.34 When considering the performance of land against the Green Belt purposes, the presence of alternative, durable boundaries can help reduce the perception of sprawl, countryside encroachment and loss of separation. In addition, release of land will typically form part of a planned extension, and consideration should be given to whether new appropriate Green Belt boundaries can be created.

Assessment

12.4.35 An assessment of the contribution that the Site makes to the purposes of the Green Belt has been undertaken and is set out in Table 10.

Table 10: Contribution of the Site to the Purposes of the Green Belt

Purpose	Assessment	Contribution	Strongly Contributing?	Harm
(a)	The Site is located between the settlements of Hook Green and Sole Street. Hook Green/Meopham is a second-tier settlement, and Sole Street is a fourth-tier settlement, as identified in the Core Strategy (2014). Neither of these settlements is classified as a large built-up area, and therefore the Site does not serve to check the unrestricted sprawl of a large built-up area. The Site is well-contained and features the defensible boundaries of the train line to the north, and roads to the south-west and south-east. These are existing physical features that would reasonably restrict and contain development. Although there is no definition of sprawl within the NPPF, the PPG indicates this to mean ‘an incongruous pattern of development (such as an extended “finger” of development into the Green	None	No	None

Purpose	Assessment	Contribution	Strongly Contributing?	Harm
	Belt'). It is therefore considered that well-designed, masterplan-led development does not constitute sprawl. Our own assessment finds that development of the Site would form a logical planned development utilising existing sustainable transport connections and would make use of robust and defensible Green Belt boundaries. In conclusion, Iceni agrees with the Council's evidence base that the parcel makes no contribution to this purpose and that it does not make a 'strong' contribution towards purpose (a). Overall, development at the Site will be well related to the existing and emerging settlement form, and as it does not lie near to a town, there will be no harm to this purpose of the Green Belt as a result of the Proposed Development.			
(b)	The Site is located between the settlements of Hook Green and Sole Street, both of which are identified as villages within the Core Strategy (2014). Paragraph 005 of the Green Belt PPG reinforces that purpose (b) relates to the merging of towns, not villages. Therefore, the Site makes no contribution towards this Green Belt purpose. As set out earlier, development at the Site will be well contained by clear boundaries, and will form a logical part of the settlement of Hook Green, which in any event is not a town.	None	No	None

Purpose	Assessment	Contribution	Strongly Contributing?	Harm
	Development at the Site will result in no harm to purpose b of the Green Belt.			
(c)	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. Given the generally open disposition of the agricultural land means that it is distinct from the built-up area of Hook Green and Sole Street, there is an air of rurality. While the edge of Hook Green is identifiable, there is the potential to provide other clearly identifiable and defensible boundaries. On balance the Site is considered to make a moderate contribution to purpose c. Should the Site be redeveloped, it would occupy undeveloped land that adjoining the existing settlement. Some extension of the settlement into the countryside would occur, but it is likely that clearly identifiable boundaries will create a firm boundary between the settlement and the wider countryside. Accordingly a moderate degree of harm would arise.	Moderate	n/a	Moderate
(d)	The Site and surroundings do not lie on the edge of a historic town and the Site does not contribute to the special character or setting of a historic town. Therefore, the Site makes no contribution towards this Green Belt purpose. Given the above the Proposed Development will	None	No	None

Purpose	Assessment	Contribution	Strongly Contributing?	Harm
	result in no harm to purpose d of the Green Belt.			
(e)	All Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose	n/a	n/a	n/a

12.5 Grey Belt Applicability

Grey Belt Definition

12.5.1 In determining whether the Site constitutes ‘grey belt’ there are several tests that would need to be met, as set out within NPPF December 2024 and clarified through the Green Belt Planning Practice Guidance (‘PPG’) published in February 2025.

12.5.2 The definition of grey belt, as set out in the Glossary (Annex 2) of the NPPF is:

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

12.5.3 The purposes referred to above are:

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

- 12.5.4 No 'restrictive policies' as set out in Footnote 7 of the NPPF apply to the Site, and the Site does not strongly perform against purposes (a), (b), or (d), as set out in Table 10.

Appropriate Development

- 12.5.5 NPPF paragraph 155 states that the development of homes, commercial and other development in the Green Belt should 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."

- 12.5.6 Each aspect above is considered in turn.

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

- 12.5.7 The Site makes up approximately 0.5% of the Borough's overall Green Belt land. Whilst development of the Site would involve a loss of open countryside, it would have no significant effect on the wider Green Belt, which would remain as countryside. This is reinforced by the existing defensible boundaries on all four sides of the Site, creating both physical and visual separation between the Site and the wider countryside to the north and south.

- 12.5.8 Overall, development of the Site would not fundamentally undermine the functions of the Green Belt taken together across the Plan as a whole. The development would therefore comply with point a of paragraph 155.

b. There is a demonstrable unmet need for the type of development proposed

- 12.5.9 Footnote 56 clarifies that in the case of applications involving the provision of housing, demonstrable unmet need means the lack of a five-year supply of deliverable housing sites, including the relevant

buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years.

- 12.5.10 In Gravesham, the most recent Five-Year Land Supply Statement 2024-2029 was published in February 2025 to reflect the revised Framework. This confirms that the Council can only demonstrate a 3-year supply of deliverable housing sites, which represents a significant shortfall.
- 12.5.11 Furthermore, the latest Housing Delivery Test figure for Gravesham was 59%, whereby presumption in favour of sustainable development applies.
- 12.5.12 Therefore, under the revised methodology, Gravesham cannot demonstrate a 5-year housing land supply, and the latest Housing Delivery Test was below 75%, meaning there is demonstrable unmet housing need in the borough. The development would therefore comply with point b.

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework

- 12.5.13 The Site is within a highly sustainable location given its proximity to the two established settlements of Hook Green and Sole Street.
- 12.5.14 The Site is extremely well served by public transport. Both Sole Street Railway Station and Meopham Railway Station are within comfortable walking/cycling distance of the Site and offer frequent and direct services to London Victoria in 35-45 minutes from Meopham Station, and 49 minutes from Sole Street via South Eastern Service. Both Sole Street and Meopham Stations offer services towards Rochester and Chatham in c.10 minutes where it is possible to change for direct services towards Gravesend, Ebbsfleet International, Stratford International or St Pancras International all in under 40 minutes (also via South Eastern service).
- 12.5.15 The Site is also well-located in terms of access to local bus services. There are a number of bus stops located along Wrotham Road (also within walking distance of the site) offering services towards Sevenoaks, Borough Green, Vigo Village and Meopham Green, with school buses serving schools in Gravesend and Dartford at peak periods.
- 12.5.16 The Site is also well placed with a large number of local facilities with 1km of the site. These facilities include:
- Meopham Community Academy (Primary School)
 - National Autistic Society - Helen Allison School (Secondary School)
 - Meopham Medical Centre
 - St Pauls Catholic Church
 - Meopham Station Post Office

- Childcare Nursery Facilities
- A range of Public Houses, Restaurants and Cafes
- Shops and Local business including a Hairdressers and a Bakery

12.5.17 It is clear that the Site is in a sustainable location offering a genuine choice of transport modes and will promote sustainable transport in line with paragraphs 110 and 115 of the Framework. As such, the Site would comply with criteria c).

d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.

12.5.18 Paragraph 156 of the Framework requires sites subject to a planning application involving the provision of housing in the Green Belt to make the following contributions:

“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.”

12.5.19 Paragraph 157 states that the affordable housing contribution to satisfy the ‘Golden Rules’ is 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In Gravesham, Policy CS16 of the adopted Local Plan requires affordable housing provision on all new housing developments above 15 units, at 30% in the urban area and 35% in the rural area. Therefore, the affordable housing provision required on Site would be 50%.

12.5.20 The Site is able to make any necessary improvements to local or national infrastructure arising through the proposals.

12.5.21 The Site can deliver a scheme that provides new, or improvements to existing, green spaces that are accessible to the public. With regards to existing green spaces, there are a range of accessible green spaces within proximity of the Site:

- Camer Park Country Park (less than 100m, adjacent to the southern boundary of the Site)
- Judson’s Recreation Ground (less than 200m from the Site, includes play facilities)

- Jeskyn's Country Park (within 1km)
- Access to a large network of Public Rights of Way

12.5.22 Overall, the Site is wholly capable of delivering a scheme that meets the 'Golden Rules'.

Summary and Conclusion

12.5.23 For the reasons set out above, the Site constitutes grey belt in accordance with the NPPF (2024) and the Green Belt PPG (2025). Development at the Site is wholly capable of achieving the 'Golden Rules' and therefore development of the Site should not be considered 'inappropriate development' in the Green Belt. As such, paragraph 153 and whether very special circumstances exist, is not a determinative test for this Site.

12.6 Effect on Openness

12.6.1 Without prejudice to the above, this section considers the extent to which the Proposed Development would result in harm to the openness of the Green Belt if it was incorrectly determined not to constitute 'grey belt' land.

Spatial Dimension

12.6.2 As set out in the NPPF substantial weight should be attributed to definitional harm on non-grey belt land. It is evident that spatially the Proposed Development will result in some loss of openness to the Green Belt in the immediate area of where built elements will be introduced.

12.6.3 The proposed built form is low-lying, comprising predominantly residential development that is limited to a maximum height of 14m. Careful consideration has been given to the developable area to ensure it responds to the Site context, including setting limits on the maximum height of built form in those areas that are potentially more visually sensitive. In addition, the eastern part of the Site will remain wholly free of built form, while an active travel corridor is incorporated through the core of the Site to creating a landscaped setting to introduced built form in all directions. In doing so, this will provide a balance of density while also preserving the environment and local amenity. It is accepted that the area of land comprises generally open countryside with an overall absence of built form.

Visual Dimension / Perceptual Loss of Openness

12.6.4 The Site does not have a large visual envelope. There are few far-reaching views of the Site, and where the Site is visible, it is not perceived in its entirety. It does not feature within any protected or key views, although it does lie in the setting of the Kent Downs National Landscape. Visibility of the Site is generally confined to the roads that immediately frame the Site and the residential properties that overlook it, as well as the PRow that extends through the Site itself. Some longer distance views

from the south and east are also obtained, where there is likely to be some intervisibility with the roofscape of introduced built form, although it will largely blend into the view and be seen to nestled amongst the wooded horizon and partially screened and softened by intervening vegetation.

12.6.5 The retention of the eastern part of the Site free of built form ensures that the prominence and visual envelope of the Proposed Development is limited, and by extension, the perceptual loss of openness. For the majority of the surrounding receptors, visibility of the Site and the introduced built form is heavily restricted. As set out above the built forms will project a limited visual envelope due to their modest footprint and scale, and by extension the visual effects will be localised in extent. Given the proposed density of built form, there will also be substantial areas of open space within the development footprint zones that will further assist in minimising the perceptual loss of openness by enabling viewers to opportunity to read the landscape without interruption, i.e. providing visual relief from built form.

12.6.6 Consistent with the Supreme Court’s judgment in Samuel Smith Old Brewery (Tadcaster) v North Yorkshire County Council [2020] UKSC 3, openness is principally a spatial concept, though visual considerations may inform the assessment of harm. In this case, the limited visual impacts materially constrain any perceptual loss of openness. Any reduction in openness will be localised, confined to views from Camer Road, Norwood Lane, and a small number of overlooking properties.

Duration

12.6.7 The Proposed Development will be permanent in nature.

Degree of Activity

12.6.8 The most apparent activity will relate to the coming and going of vehicles associated with a residential development of this scale (refer to the related traffic and transport documentation that supports the application for a breakdown of detail), alongside the typical activities you would expect including tending of gardens, playing children etc. There are no notable intensive activity generators within the Site, although the provision of play equipment and the Camer Park Extension may result in increased foot traffic from the surrounding area as this will become a local community asset in the neighbourhood.

Summary

12.6.9 The Proposed Development will introduce some definitional loss of openness to the Green Belt through new built form, but this will be modest in scale, carefully sited, and balanced by substantial areas of retained open space, including the eastern portion of the Site which remains free of development. The Site has a limited visual envelope, with visibility largely confined to nearby roads,

a small number of properties, and the PRow, while longer views are softened by vegetation and the wooded horizon.

- 12.6.10 The development will be permanent, but associated activity will be typical of residential use and not intensive, with the Camer Park Extension providing a community amenity that integrates positively with the surrounding landscape.
- 12.6.11 On balance it is considered that the harm to the openness and permanence of the Green Belt would be moderate.

12.7 Conclusion

- 12.7.1 A Green Belt Assessment has been carried out, which has identified that the Site constitutes grey belt in accordance with the NPPF (2024) and the Green Belt PPG (2025). Development at the Site is wholly capable of achieving the 'Golden Rules' and therefore development of the Site should not be considered 'inappropriate development' in the Green Belt.
- 12.7.2 Without prejudice to the above, an assessment of the effect of the Proposed Development on openness has been conducted. In the unlikely event that a decision maker determines that the Site does not constitute grey belt, evidently there would be definitional harm caused by development in the Green Belt. However, given the characteristics of the Site, the level of harm to Green Belt openness is limited to the immediate site (i.e. on-site and localised) and is considered to be moderate.