



SITE SPECIFIC GREEN BELT APPRAISAL

LAND OFF CHALK ROAD, HIGHAM, KENT, ME3 7JY

ON BEHALF OF

RICHBOROUGH

AUGUST 2025

V3

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1.0 INTRODUCTION

Introduction

- 1.1. BLADE Landscape Architects Limited ('BLADE') were commissioned on behalf of Richborough (the 'Applicant') to prepare a Green Belt Position Review which examines the prospect of future development on land situated on the northwestern edge of Higham, and contribute to the iterative development of the Masterplanning for a new residential development.
- 1.2. The site cover 1.68 Hectares (Ha) and is located at OS Grid Reference: TQ 71162 72966 (site centre). The Applicant is seeking Outline Planning Permission for new homes to be situated on land situated off Chalk Road, Higham, Kent, ME3 7JY (the 'Site'); see Appendix BLA 1.
- 1.3. Higham is a village that is located south-east of Gravesend and just north-west of Strood, in Medway. The civil parish had a population of 3,938 at the 2011 Census, increasing slightly to 3,962 at the 2021 Census. The Site is in the county of Kent, and found within the administrative authority of Gravesham Borough Council (the 'LPA').

The Site

- 1.4. The Site measures 1.68 Hectares and is in mixed use with the existing buildings being used for a mix commercial and domestic purposes and the surrounding land being used for temporary storage and animal grazing.
- 1.5. The whole quantum of the site is within the control of the Applicant. This will form the basis of the planning application. A survey of the Site was undertaken by BLADE's Landscape Team in July 2025.

The Proposed Development

- 1.6. The Applicant is submitting an Outline Planning Application for the demolition of existing buildings and erection up to 40 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Chalk Road and all other matters are reserved.

Approach

- 1.7. This Position Paper forms part of an independent technical examination of the Site and has been informed by a desk-based review of available data, policy, landscape character publications and mapping, as well as the Local Planning Authority's own Green Belt Study (published in April 2018). A site visit was undertaken by an experienced member of BLADE's Landscape Team in June 2025.
- 1.8. For consistency, this Green Belt Review undertaken by BLADE has been conducted in line with the methodology used in the Gravesham Green Belt Study Stage 1 and Stage 2, which were published in 2018 and 2020 respectively.

2.0 PLANNING CONTEXT AND RELEVANT CONSIDERATIONS

The Metropolitan Green Belt

- 2.1. The Metropolitan Green Belt is a statutory Green Belt around London, England. It comprises parts of Greater London, Berkshire, Buckinghamshire, Essex, Hertfordshire, Kent and Surrey, parts of two of the three districts of Bedfordshire and a small area in Copthorne, Sussex.
- 2.2. The Metropolitan Green Belt was first formally proposed by the Greater London Regional Planning Committee in 1935, *'to provide a reserve supply of public open spaces and of recreational areas and to establish a green belt or girdle of open space'*. New provisions for compensation in the Town and Country Planning Act 1947 allowed local authorities to incorporate green belt proposals in their first development plans., and was formally approved.
- 2.3. The Metropolitan Green Belt was established in the 1930s and has expanded enormously since. Accompanying policies, including New Towns, have since been abandoned, leaving the MGB as an 'orphaned' policy which constrains land supply. The Green Belt was extended after 1955, in places to a distance of 35 miles out. The belt is subject to minor annual variations, and covers an area approximately three times the size of London.
- 2.4. Extension has taken place to take in large parts of the Surrey Hills, Chiltern Hills and three of the areas known as various Wealds including Epping Forest, as such extension pre-dates certain largely duplicative protections which cover those areas, particularly Areas of Outstanding Natural Beauty (now the National Landscape).
- 2.5. Over the life of the Green Belt it has been described and regulated by a series of different national planning regimes. Nevertheless, certain basic principles have remained in place since the 1947 Act. England has a discretionary planning system; rather than using zoning, it is a plan-led system – although the Green Belt looks something like a zonal system, for which plans are developed in a context set by the national government.

National Planning Policy

- 2.6. With regard to the National Planning Policy Framework ('NPPF'), 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. As such, Green Belt is a planning policy designation rather than a landscape designation based on landscape character and value.
- 2.7. Notwithstanding, the general stance on the protection of the Green Belt, the NPPF is also clear that Green Belt boundaries can be altered, but only in exceptional circumstances and that this process can only be undertaken through the preparation or review of the Local Plan.
- 2.8. NPPF Chapter 13, paragraph 143 continues and sets out five purposes of the Green Belt, which are listed below:

'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.'*

N.B. The above are referred to in this Green Belt Reviews as Green Belt functions, and are numbered accordingly as 1 to 5.

2.9. Guidance in paragraph 147 and 148 makes clear that, when reviewing Green Belt boundaries, Local Planning Authorities (LPA) should take account of the need to promote sustainable patterns of development and consider the consequences for sustainable development of channelling development towards urban areas and towns and villages inset within the Green Belt or towards locations outside the Green Belt boundary.

2.10. Paragraph 148 states:

'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.....

2.11. On Grey Belt, having issued a consultation draft soon after coming into office in July 2024, the Government considered the responses and issued its final version of the policy document. It makes substantial changes to planning policy in a number of areas, most notably in relation to the Green Belt, policy for which now includes the category of 'Grey Belt' (as above within Paragraph 148) – land which is either previously developed or performs poorly against a number of the purposes of the Green Belt.

2.12. While avoiding a complete overhaul of the existing green belt policy, the key element is a new category of 'grey belt land', which is a recognition that not all green belt land is of a good quality, or in need of protecting.

2.13. On 27 February 2025 the Government published an update to its national planning guidance on Green Belt Land to include guidance on how to identify Grey Belt Land and to apply the planning policies set out in the NPPF relating to this Land. This is defined as: 'land in the green belt comprising previously developed land and/or any other land which, in either case, does not strongly contribute to any of purposes 1, 2 or 4 as below:

- *Green Belt purpose 1 – 'To check the unrestricted sprawl of large built-up areas'*
- *Green Belt purpose 2 – 'To prevent neighbouring towns merging into one another'*
- *Green Belt purpose 4 – 'To preserve the setting and special character of historic towns'*

2.14. This confirms that in regard to Green Belt purpose 1, this relates to the sprawl of large built up areas, and that villages should not be considered large built up areas. Similarly, in respect of purposes 2 and 4, these relate to towns and not villages.

2.15. For Grey Belt, the NPPF does not include Green Belt purpose 3 - 'safeguarding the countryside from encroachment' or Green Belt purpose 5) 'assisting in urban regeneration' which, as noted in the government's consultation response, was seen by many as too ambiguous. The definition of previously developed land has been expanded and, in particular, now expressly includes hardstanding.

2.16. Additionally, Grey Belt land cannot include land where the following designations would provide a strong reason for refusing or restricting development (e.g., SSSIs, habitats sites, irreplaceable habitats, designated heritage assets, or areas at risk of flooding or coastal change).

2.17. Also of relevance to this Green Belt Position Review is guidance in paragraph 148 about defining boundaries, which states that Local Authorities should *inter alia*:

- *'Not include land that it is unnecessary to keep permanently open.'*
- *'Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

2.18. Additionally, Paragraph 150 states:

'If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.'

2.19. 'Openness' and 'permanence' are essential characteristics of the Green Belt and they contribute to the fundamental aim of the Green Belt policy, to prevent urban sprawl by keeping land permanently open.

2.20. Given the site's location on the periphery of the Green Belt, it would appropriate to consider the likely effect on these characteristics of the wider Green Belt, even if it to only demonstrate, that any resulting effect would be indirect, and benign its magnitude.

2.21. Paragraph 156 sets out how the NPPF's 'Golden Rules' relative to major development within the Green Belt, and states the following:

'Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review⁵⁸, 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.

2.22. Paragraph 158 continues to recognise development which complies with the Golden Rules should be '*given significant weight in favour of the grant of permission' and 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'*'

Local Planning Policy

2.23. The Site is situated within the administrative area of Gravesham Borough Council. The Gravesham Local Plan Core Strategy was adopted in 2014 and is the main document in the Gravesham Local Plan with the purpose to '*set out a long-term vision for the future of Gravesham based on evidence of need to support communities and outline what makes Gravesham a distinctive and attractive place to live and work' and 'support and inform via sustainable development via investment in infrastructure, economic development, and regeneration proposals within the borough, while promoting healthy communities' and facilitate a 'consistent basis for planning application decisions.'*'

2.24. Policy CS02 is entitled 'Scale and Distribution of Development; and states the following:

'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.'

3.0 GRAVESEND GREEN BELT STUDY: STAGE 1

Overview

- 3.1. Much of Gravesham's rural area to the east and south of Gravesend and Northfleet falls within the metropolitan Green Belt which is intended to protect London from sprawling further outwards. Parts of the Borough form the eastern boundary to the metropolitan Green Belt.
- 3.2. The whole of the Green Belt in Gravesham is covered by the 2018 Gravesham District Council's Gravesham Green Belt Study. The area has been subdivided into parcels and vary in size, '*generally follow boundaries formed by roads and railways, and in more remote areas with few roads, tracks, the edge of the urban area of Gravesend/Northfleet/Ebbsfleet defined on the Local Plan Policies Map, edges of settlements inset from the Green Belt defined on the Local Plan Policies Map and the Council's administrative boundary*'.
- 3.3. The core purpose of this Stage 1 assessment was to provide the '*assessment of the Green Belt in Gravesham against the National and local purposes of the Green Belt. The results will help to inform the options for accommodating growth in the Borough and detailed changes to the Green Belt boundaries and site allocations, if required.*'
- 3.4. The LPA acknowledges, that this study is '*not intended to be a comprehensive Green Belt review at this stage, rather a higher level appraisal that will inform more detailed work later to be prepared for the Regulation 18 (Stage 2) consultation in 2019*', and '*no consideration has been given within this document at this stage to the recent publication by the Government of its draft revised National Planning Policy Framework*', which at this time was the draft version, later adopted in December 2018.
- 3.5. In the first instance, BLADE considers the LPA's Stage 1 Green Belt Study, and the considers the '*more detailed work later to be prepared for the Regulation 18 (Stage 2)*' later within this section of our Green Belt Review.

Scope of Assessing Green Belt Purposes

- 3.6. Gravesham District Council's assesses three out of the five Green Belt purposes, with those being:
 - Green Belt purpose 1: Check the unrestricted sprawl of large built-up areas.
 - Green Belt purpose 2: Prevent neighbouring towns merging.
 - Green Belt purpose 3: Safeguarding the countryside from encroachment.
- 3.7. Additionally, for Green Belt purpose 2, the LPA have expanded its assessment criteria to also include an examination of how the land '*Prevents other settlements in the Green Belt from merging*'; this is included within Green Belt function 2, as a subsection 2a. This is an additional purpose, and one which is not commonly seen amongst current Green Belt Reviews, with the LPA justifying this measure as '*an additional purpose which has been added to the assessment to consider the contribution each parcel plays in preventing settlements inset from the Green Belt from merging with each other*'.

3.8. It considers the effect of development on both sides of the roads where the '*roads form the boundary of the parcel. It also highlights if one part of the parcel is more important in terms of preventing merging. Where the majority of the parcel separates two or three settlements inset from the Green Belt, it is assessed as having a significant contribution. In cases where part of the parcel separates two or three settlements inset from the Green Belt, it will be assessed as having a contribution. All other parcels will be assessed as having minimal/no contribution*'.

3.9. With regard to Green Belt purpose 4 ('Preserve the setting and special character of historic towns'), the LPA considers that the '*Green Belt has no real role in preserving the setting and special character of Gravesend and Northfleet.*' However, only Gravesend and Northfleet comprise the towns within the Borough and both have historic cores which are reflected by a number of conservation area designations.

3.10. The LPA recognises that the '*Green Belt boundaries are located some distance from these conservation area boundaries*' and consequently, the LPA elected to not assess land against the fourth Green Belt function. With regard to the Site located within the northwestern edge of Higham, BLADE notes the following:

- There are no designated heritage assets within the Site, the Site is not situated within or adjoining a Conservation Area, or a Registered Park or Garden, Registered Battlefield or World Heritage Site; and
- The Site itself has no known notable cultural associations with art, literature or events in history.

3.11. Given the foregoing, BLADE concurs with the LPA's approach to exclude this Green Belt function from their Green Belt Study (2018).

3.12. In their assessment, Green Belt purpose 5 ('Assist urban regeneration by encouraging the recycling of derelict and other urban land') is also excluded, with the LPA advocating:

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

Assessment Criteria

3.13. On page 8 of their Gravesham Green Belt Study (2018), the LPA does not define their assessment criteria in any real detail; rather, it states the following:

'Assessment against each relevant national and local Green Belt purpose using a traffic light system of: Significant Contribution, Contribution or Minimal/No Contribution.'

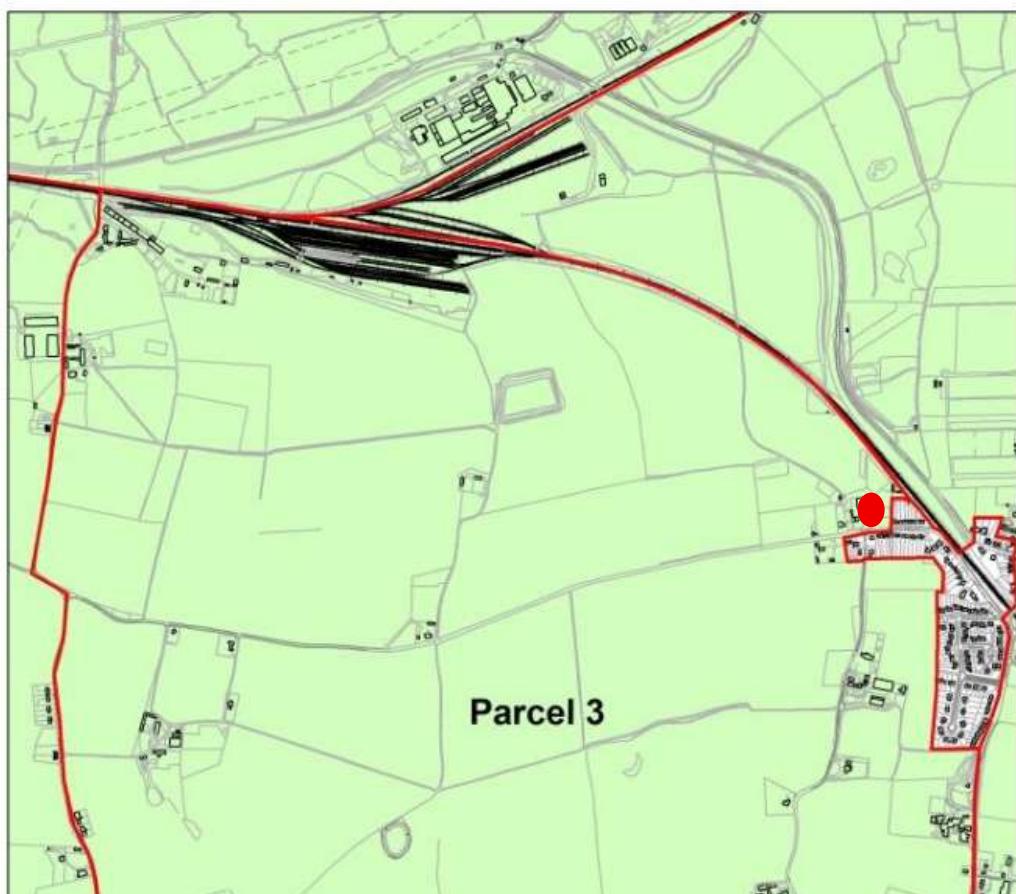
3.14. It is to be noted, that to maintain consistency in this Site-specific Green Belt Study, the performance of the Site is compared to that of the Parcel within which it is located. This is undertaken by using the same methodology adopted in undertaking their own study in 2018.

3.15. With consideration of the drawn plan of Parcel 3 North and West of Higham contained at page 22 of the Gravesham Green Belt Study (2018), the Site is found on the peripheral edge of Parcel 3 - North and West of Higham; see Image BLA 3.1:

Image BLA 3.1: Extract from the Gravesham Borough Council's Gravesham Green Belt Study (April 2018), page 22. N.B. The approximate location of the Site is indicated by BLADE with a solid red circle

Gravesham Green Belt Study April 2018

Parcel 3 North and West of Higham



Parcel 3 - North and West of Higham

3.16. In their analysis, the LPA describe this land parcel as:

'The parcel lies between the north Kent railway line to the north and the A226 Gravesend Road to the south. Queens Farm Road and Green Farm Lane form the western boundary and School Lane comprises the eastern boundary. A number of settlements inset from the Green Belt abut the parcel; Lower Higham to the north east, Higham to the south east and Lower Shorne to the south west. The area is bisected from west to east by Lower Road/Chalk Road.'

3.17. The LPA continues:

'The parcel is mainly arable land. It contains some scattered farmsteads and dwellings, as well as Higham Primary School. The north western part of the parcel contains railway sidings and industrial development associated with Hoo Junction and industrial buildings around Queens Farm Road.'

3.18. Whilst the LPA do not calculate the size of Parcel 3, BLADE has estimated Parcel 3 to be circa 330 Hectares in quantum. For Parcel 3, the LPA find that the Parcel makes the following contribution to the assessed Green Belt functions, as summarised in Table BLA 3.1:

Table BLA 3.1: Summary of the Gravesham Borough Council's assessment for Parcel 3 - North and West of Higham (Gravesham Green Belt Study Stage 1, 2018)

Green Belt function	Assessment by Gravesham District Council's (2018)	Comment by Gravesham District Council's (2018) for Parcel 3 - North and West of Higham N.B. Emphasis added by underlining by BLADE
1. <i>To check unrestricted sprawl of large built-up areas</i>	Minimal/No Contribution	<i>'The area does not abut either Gravesend or Strood so it does not directly check the unrestricted sprawl of large built up areas.'</i>
2. <i>To prevent neighbouring towns merging into one another</i>	Significant Contribution	<i>'The parcel is situated between Gravesend and Strood....The gaps to the west between Lower Shorne and Gravesend (parcel 2) and to the east between Higham and Strood (parcels 5 and 11) are relatively narrow. As a result, this parcel, in combination with other parcels, plays a significant role in preventing Gravesend merging with Strood and maintaining the break in built development between them.'</i>
2a. <i>To prevent other settlements in the Green Belt from merging</i>	Significant Contribution	<i>'The parcel is located between three settlements inset from the Green Belt (Lower Shorne, Higham and Lower Higham). The gaps between Higham and Lower Shorne and Higham and Lower Higham are narrow. In the latter case there is already a significant amount of development in the gap between the two settlements....Overall, it is considered that this parcel plays a significant contribution in preventing settlements from merging with each other.'</i>

<p>3. <i>To assist in safeguarding the countryside from encroachment</i></p>	<p><i>Significant Contribution</i></p>	<p><u>'Where they do not abut settlements, the northern and southern boundaries follow the railway line and a main road (A226) so these form strong boundaries. The eastern and western boundaries largely follow more rural lanes so are distinct but weaker. Around all three settlements the boundaries are weak as they generally follow the curtilages of residential properties.'</u></p> <p><u>The parcel mainly comprises agricultural land. The main urbanising features are around the Hoo Junction railway sidings but these comprise only a small part of the parcel and do not abut a settlement. There is some development close to the defined settlement of Lower Higham on Chalk Road but this is more sporadic than the more dense development within the settlement boundaries and does not undermine its boundaries. The open nature of the parcel and its rising topography make it visible from roads in the vicinity. This landscape character, together with its primarily agricultural use, means that it plays a significant contribution towards safeguarding the countryside from encroachment and preserving the openness of the Green Belt.'</u></p>
<p>4. <i>To preserve the setting and special character of historic towns</i></p>	<p><i>Not assessed</i></p>	<p><i>'It is considered that the Green Belt has no real role in preserving the setting and special character of Gravesend and Northfleet.'</i></p>
<p>5. <i>Assist urban regeneration by encouraging the recycling of derelict and other urban land</i></p>	<p><i>Not assessed</i></p>	<p><i>'It is considered that the Green Belt parcels in Gravesham contribute equally towards assisting urban regeneration by encouraging the recycling of derelict and other urban land in the wider area.'</i></p>

Summary

3.22. The foregoing analysis draws on the LPA Stage 1 of the Gravesham Green Belt Study (April 2018); for which the LPA summarise the finding of their assessment as follows (N.B. Emphasis added by BLADE by underling):

'The parcel plays a significant role in preventing neighbouring towns from merging, preventing rural settlements from merging and safeguarding the countryside from encroachment. The easternmost part of the parcel is particularly important in preventing Higham from merging with Lower Higham.'

Apart from possibly infilling or redeveloping the small industrial areas in the north western corner of the parcel, there are no real opportunities for development in the area without adverse effects on the strategic purposes of the Green Belt. There are limited opportunities to strengthen the strategic boundaries without causing the settlements to merge. At a more local level, the Green Belt around Lower Higham may be strengthened by following Taylors Lane rather than the curtilages of dwelling houses to the west of it.'

4.0 GRAVESEND GREEN BELT STUDY: STAGE 2

Overview

4.1. The Gravesham Borough Council Gravesham Stage 2 Green Belt Study was published in 2020. The study providing an evidence base for the preparation of the Council's Site Allocations and Development Management Policies document and the Partial Review of the Local Plan Core Strategy to inform future options for accommodating development in the Borough as the Local Plan was reviewed for beyond 2028.

4.2. This 'Stage 2' study follows on from a 'Stage 1' study that was published in April 2018. The Stage 1 study was a *'high-level appraisal that assessed the whole of the Green Belt in Gravesham in terms of its contribution to the five purposes of the Green Belt'*.

4.3. The Stage 2 study was prepared to provide a 'more focused and finer grained assessment' that provided a 'more specific spatial assessment of harm to the purposes of the Green Belt focussed on land around the urban area and rural settlements inset from the Green Belt.' The purpose of the study is to identify the extent of the harm to the purposes of the Green Belt of releasing land around the urban area and rural settlements inset from the Green Belt within the Borough.

4.4. A total of 122 parcels were identified and assessed as part of the Stage 2 study reflecting the *'potential harm to Green Belt purposes, rated on the basis of a 5-point scale of high, moderate-high, moderate, low-moderate and low. Parcels were defined up to the point where it was considered that the release of land would cause high harm to Green Belt purposes.'*

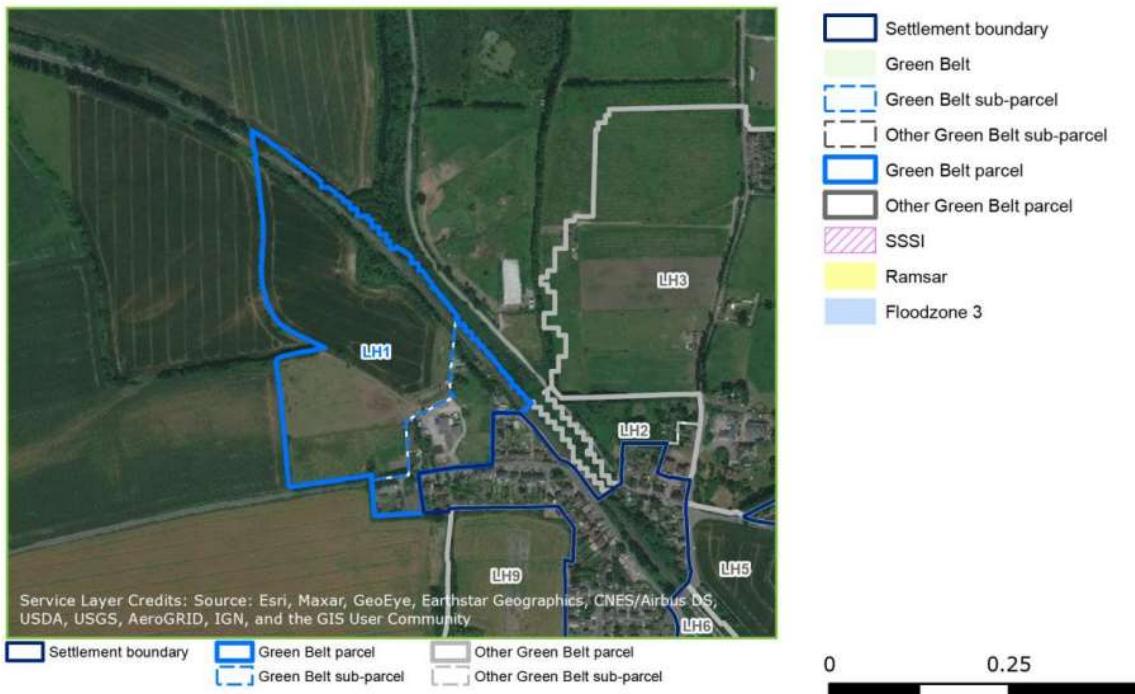
4.5. With consideration of Chapter 4 of the Gravesham Borough Council Gravesham Stage 2 Green Belt Study, the LPA provides an assessment methodology, and within Table 4.5 (page 34) an assessment criterion is provided. This criterion defines harm to the Green Belt ranging from High to Low; which is reproduced below:

- ***'High harm:*** *Release of land that makes a significant contribution to at least one of the Green Belt purposes, and would constitute at least a minor weakening of the integrity of land that remains designated as Green Belt.*
- ***Moderate-High harm:*** *Release of land from the Green Belt that makes a relatively significant contribution to one of the Green Belt purposes and a less significant contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.*
- ***Moderate harm:*** *Release of land from the Green Belt that makes a moderate contribution to one of the Green Belt purposes and a less significant contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.*
- ***Moderate- Low harm:*** *Release of land from the Green Belt makes a relatively limited contribution to one of the Green Belt purposes and a limited contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.*

- **Low harm:** Release of land from the Green Belt that makes limited or no contribution to all of the Green Belt purposes, and would cause no more than a minor weakening of the integrity of land that remains designated as Green Belt.'

4.6. This Stage 2 Green Belt Study examined Green Belt purpose 1 to 4. The Gravesham Borough Council Gravesham Stage 2 Green Belt Study finds the Site within a wider land parcel, which is referenced 'LH1'; see Image BLA 4.1:

Image BLA 4.1: Extract from the Gravesham Borough Council Gravesham Stage 2 Green Belt Study (August 2020), page Appendix, page 218



4.7. Whilst the LPA do not calculate the size of LH1, the Site is considerably less in its quantum than the wider LH1, and is described as:

'Relatively flat area of farmland with a cluster of agricultural buildings and equestrian centre, adjacent to the north eastern edge of the settlement of Lower Higham. With the exception of a single property on the western edge of the settlement to the south of Chalk Road, and a bungalow on the north side of Chalk Road, the parcel contains no urbanising development to diminish openness. Land beyond Buckland Farm is not contained by any urbanising development, however there is more influence from existing development in the vicinity of the farm buildings, and between them and the inset edge to the east. The boundaries of residential gardens provide minimal distinction from the urban edge. The outer boundary with adjacent Green Belt land is defined by the railway line to the north, field boundaries to the west and Chalk Road to the south.'

4.8. The Site is located within the part of LH1 which is recognised by the LPA as within a '*cluster of agricultural buildings and equestrian centre, adjacent to the north eastern edge of the settlement of Lower Higham*' where there is '*influence from existing development in the vicinity of the farm buildings, and between them and the inset edge to the east.*' From BLADE's own field-based assessment, the following is note about the location and context of the Site:

- The Site is in mixed use with the existing buildings being used for a mix commercial and domestic purposes and the surrounding land being used for temporary storage and animal grazing.
- The Site has a mixture of robust hedgerows trees and fencing with domestic curtilages to the eastern site boundary. The Site contains built form and also hard standing associated with its mixed and domestic uses.
- The Site is situated within the lower lying part of Higham village and inside such features as '*shelterbelts, fence lines, gappy hedgerows and ditches provide an element of enclosure*' (which are noted within the Gravesham Landscape Character Assessment (May 2009) as typical of the host Higham Arable Farmland Landscape Character Area
- The Site is partially overlooked by neighbouring residential development to the west and northwest. The Site is perceived to have a village edge location, and is situated physically adjoining residential built form at a location which already contains built development. Consequently, the Site is situated within the influence of the built form of the village, rather than being wholly within the open countryside, and is considered to have a spatial equivalence to these neighbouring land uses

4.9. Given the foregoing, whilst the Site is found within the lad parcel LH1, it is situated is adjoining the village edge, and influenced more so by this location. The mixed use, hard standing and associated paraphernalia is limiting in the perception of openness, with land on the west and north of the field hedgerows and shelterbelts being experienced as more open and contain no built form.

4.10. In this sense the openness of the Green Belt diminishes in its vicinity to the village edge of Lower Higham, and consequently, BLADE concurs with the LPA who recognise these qualities in their examination of LH1:

'Open and uncontained land to the north, where the railway line forms a strong boundary has greater separation from the inset settlement edge. To the west, visual openness in this low-lying arable landscape strengthens, with distance, the lands association with the countryside rather than the settlement.'

4.11. For Parcel LH1, the LPA find that the parcel makes the following contribution to these assessed Green Belt purposes, as summarised in Table BLA 4.1:

Table BLA 4.1: Summary of the Gravesham Borough Council Gravesham Stage 2 Green Belt Study (August 2020) for LH1

Green Belt function	Assessment by Gravesham Borough Council's (2020)	Comment by Gravesham Borough Council's (2020-) for LH1 N.B. Emphasis added by underlining by BLADE
1. <i>To check unrestricted sprawl of large built-up areas</i>	Limited/ No Contribution	'The parcel is associated with Lower Higham, which is <u>not a large built-up area and it does not have a strong enough relationship with either Gravesend or Strood to be considered to contribute to this purpose.</u> '
2. <i>To prevent neighbouring towns merging into one another'</i>	Relatively Limited	'The land lies in the gap between the towns of Gravesend and Strood which is diminished by intervening rural settlements but which has significant separating features including large woodlands and the valley along which the A289 passes. It is open and uncontained, and so has a stronger relationship with the countryside than with the settlement.'
3. <i>Assist in safeguarding the countryside from encroachment</i>	Relatively significant	'Land beyond Buckland Farm, despite a lack of distinction on the settlement edge, is open and uncontained countryside. Land here has a stronger relationship with the countryside than with the settlement.'
4. <i>To preserve the setting and special character of historic towns'</i>	Limited/ No Contribution	'Land does not make a significant contribution to the setting of any historic town.'

Summary

4.12. The LPA's Stage 1 study for Parcel 3 - North and West of Higham highlighted the following points for the more extensive land parcel:

1. '*The parcel plays a significant role in preventing neighbouring towns from merging, preventing rural settlements from merging and safeguarding the countryside from encroachment.*

4.13. For LH1, the LPA consider that this smaller land area does 'not contribute to this purpose. Additionally, Higham is a small rural village and not a large built up area such as town. The physical separation of the large built up areas of Gravesend or Strood would remain functional, and being as LH1 does not

neighbour or adjoin these towns, the land does not provide a significant contribution to checking the unrestricted sprawl of large built up areas.

2. *The parcel is particularly important in preventing Higham from merging with Lower Higham.*

4.14. The Site is located north of Chalk Lande, and plays a subservient role to the land south of Chalk Road in preserving the identity of Higham and Lower Higham. The Site is within mixed use with the existing buildings being used for a mix commercial and domestic purposes and the surrounding land being used for temporary storage. This current baseline represents development, and the existing residential development off Chalk Lane and Taylors lane provide an edge to Lower Higham at this location with the Site situated beyond this away from Higham and '*contained between the farm buildings and the settlement edge, would be contained on two sides by urbanising development and strongly bound to the north by the railway line.*'

4.15. Additionally, for LH1 the LPA notes that the land makes limited to no contribution to '*reserve the setting and special character of historic towns.*'

3. *There are no real opportunities for development in the area without adverse effects on the strategic purposes of the Green Belt.*

4.16. Within the 2020 Stage 2 study, the LPA considers that the land beyond Buckland Farm to the west is '*open and uncontaminated countryside*' with a '*stronger relationship with the countryside than with the settlement.*' Given our field-based assessment, BLADE concurs with this conclusion, but notes that the Site is situated on the eastern edge of LH1, and Buckland Farm is the part of the mixed use built form at the Site. Consequently, whilst land west of Buckland Farm makes a '*relatively significant*' contribution to Green Belt purpose 3, the area of the Site within LH1 does not.

4.17. In their examination of LH1, the LPA note the opportunity to facilitate a small level of development around the location of the Site area within LH1, stating the following:

'A more limited release that only took in Buckland Farm, adjacent dwellings to the north and south of Chalk Road and land to the east contained between the farm buildings and the settlement edge, would be contained on two sides by urbanising development and strongly bound to the north by the railway line. The existing buildings would provide an edge to the west, limiting the weakening of the integrity of adjacent Green Belt land. As such, the harm to Green Belt purposes would be reduced to low-moderate. Harm of releasing this would also be low-moderate.'

4. *There are limited opportunities to strengthen the strategic boundaries without causing the settlements to merge.'*

4.18. With consideration of the Stage 2 study by the LPA for LH1, it is noted that the LPA have identified the following initiatives for strengthening the boundary resilience for the Green Belt at this location:

'Although the current settlement edge is not strongly defined, a new boundary extending further north and west to the edges of the parcel would constitute a significant increase in Green Belt boundary length.... the railway line forms a strong boundary to the north/east.'

4.19. Given the foregoing, BLADE concurs with the LPA that LH1 does not make a significant contribution to Green Belt purposes 1, 2 and 4. With consideration of how the Site function with LH1, BLADE considers that the Site does not make an overall significant contribution to Green Belt function. This is considered further a more detailed Site specific assessment in the following section of this report.

5.0 SITE-SPECIFIC GREEN BELT REVIEW

Methodology

5.1. An assessment methodology is contained within the Gravesham Borough Council Gravesham Stage 2 Green Belt Study (August 2020). This methodology is similar to that utilised by the LPA in their assessment of Parcel 3 - North and West of Higham, and was the assessment methodology used in examining LH1. This is the methodology which BLADE has followed in undertaking this site specific assessment.

Green Belt Function 1: To check unrestricted sprawl of large built-up areas

5.2. The Site is partially overlooked by neighbouring residential development to the west and northwest. The Site is perceived to have a village edge location, and is situated physically adjoining residential built form at a location which already contains built development.

5.3. In a village character and landscape sense, the Site is not experienced as beyond the village of Higham within the open countryside, and is considered to have a spatial equivalence to these neighbouring land uses with residential built form.

5.4. Additionally, the Site does not abut either Gravesend or Strood so it does not directly check the unrestricted sprawl of these outlying large built up areas.

5.5. Given the foregoing, BLADE concurs with the LPA on their Green Belt Study that the Site within LH1 (as well previously as part of Parcel 3) makes a minimal/no contribution to check unrestricted sprawl of large built-up areas (Green Belt purpose 1), with the Site making **No Contribution** to this Green Belt function.

Green Belt Function 2: To Prevent neighbouring towns merging into one another

5.6. The LPA considers that Parcel 3 affords a significant contribution to this second Green Belt function where the '*parcel is located between three settlements inset from the Green Belt (Lower Shorne, Higham and Lower Higham)....that this parcel plays a significant contribution in preventing settlements from merging with each other.*' Specifically, the LPA cite the '*gaps between Higham and Lower Shorne and Higham and Lower Higham are narrow. In the latter case there is already a significant amount of development in the gap between the two settlements, both within the parcel to the west of School Lane and in parcel 5 to the east of School Lane.*'

5.7. However, as noted within BLADE's analysis for Green Belt function 1, the Site is previously developed land containing built form within (and inside) the wider residential built form that encloses the Site on the village edge of (Lower) Higham.

5.8. Additionally, within the Stage 2 Green Belt Study (2020) for LH1, the LPA conclude that the smaller land parcel makes only a '*relatively limited*' contribution to this Green Belt purpose, which is defined by the LPA in their 2020 methodology as :

'It has a stronger relationship with the countryside than with the settlement– e.g. it contains no (or very limited) urban development, is partially contained by urban development, and has moderate boundary distinction from the settlement edge.'

OR

'It has a strong relationship with the wider countryside, but there are significant separating features to increase the perceived gap between the towns.'

- 5.9. However, the Site area affords little, if no discernible contribution to separating large urban areas such as Shrood and Wainscott to the east-south east (circa 3.25km and 3.5km respectively) and Gravesend situated circa 3.3km west of the Site. The Site is situated within the built limits of the village, and would not extend outwards into the intervening open countryside between Higham and these large towns.
- 5.10. Consequently, development of the Site would not directly reduce the existing distance between the outlying towns and the village Higham. The existing gap between settlement would remain unchanged, and the intervening Green belt would retain physical openness.
- 5.11. Specifically, within their 2020 Sage 2 Green Belt Study, the LPA recognises ten characteristics of the wider area of LHJ1, stating:

'It is open and uncontained, and so has a stronger relationship with the countryside than with the settlement.'
- 5.12. In this instance, it is clear that the LPA are referring to land beyond the existing built form at the Sute, and the wider open fields beyond the extensive tree belt (west of the Site) and the tree belts to the railway line (to the north). The adjacent dwellings to the north and south of Chalk Road is contained on two sides by urbanising development and strongly bound to the north by the railway line. The existing residential buildings beyond the Site would provide an edge to the west, with more open land experienced beyond these features.
- 5.13. The Site is a previously developed land within the perceived built limits of (Lower) Higham rather than the wider open countryside between settlements. the development of the Site would not be experienced as unexpected or out of context, whereas land developed outside of (Lower) Higham would be direct impact the openness of the intervening countryside.
- 5.14. It is judged that this Site provides **No Contribution** to the separation of large urban areas such as towns, and does not contribute to the separation between towns due to its containment on the settlement edge with significant separating features beyond in LH1 (and Parcel 3) to increase the perceived gap between the towns.
- 5.15. Beyond the Site area, and outside of the village edge to the west, the wider open countryside is managed as arable crops and fruit fields, and in these situations there are broad open views between, not necessary affording intervisibility between the outlying towns, but the development of land outside of the village would be more readily seen and would direct impact the spatial openness and visual openness of the wide Green Belt, and its potential for intervisibility across the neighboring

land parcels. In these situations, land within the wider Parcel 3 affords a more significant contribution to preventing neighbouring towns merging into one another, or perceived as visual coalescence.

- 5.16. The development of the Site would not extend outwards from the perceived village edge of Higham (to the west along Chalk Road) and would not extend built form south of Chalk Road to fill in part of the existing gap between Higham and Lower Higham. The northern and northeastern edge of the Site is situated inside the North Kent railway line which is enclosed by extensive vegetation and tree groups.
- 5.17. The LPA highlights land to the southeast and south of Higham village would be sensitive to accommodate new development, and in these locations '*there is already a significant amount of development in the gap between the two settlements, both within the parcel to the west of School Lane and in parcel 5 to the east of School Lane.*' The LPA have examined this area and concluded that the '*presence of this development makes this part of the parcel particularly important in preventing any further merging of the settlements.*' The Site is not situated at this location; rather it is found on the opposite northwestern edge of (Lower) Higham village.
- 5.18. The Site is situated within the lower lying part of Higham village and inside such features as shelterbelts, fence lines, gappy hedgerows and ditches provide an element of enclosure, and inside of extensively tree'd and vegetated North Kent railway.
- 5.19. It is worthwhile noting, that the most recent national planning guidance on Green Belt Land relates to the sprawl of large built up areas, and that villages should not be considered large built up areas, and in respect of Green Belt purpose 2, this relates to towns (and large urban area), rather than small villages situated within the Green Belt. Given the foregoing, BLADE considers that the Site affords **No Contribution** to preventing towns from merging.

Green Belt Function 3: To assist in safeguarding the countryside from encroachment

- 5.20. In their Gravesham Green Belt Study (2018), Gravesham Borough Council consider hat Parcel 3 makes a significant contribution to assisting in safeguarding the countryside from encroachment. However, the Site is situated within the built limits of the village at (Lower) Higham rather wider countryside outlying to Higham, which is noted by the LPA as the '*open nature of the parcel and its rising topography make it visible from roads in the vicinity.*'
- 5.21. This landscape character, together with its primarily agricultural use, means that it '*plays a significant contribution towards safeguarding the countryside from encroachment and preserving the openness of the Green Belt*' and development outside of the village is likely to lead to substantive impact on the physical and visual openness of the Green Belt between settlements.
- 5.22. The area of Parcel 3 nearest to the Site is noted by the LPA as where there is '*some development close to the defined settlement of Lower Higham on Chalk Road but this is more sporadic than the more dense development within the settlement boundaries and does not undermine its boundaries.*' The Site is situated within this location, with the Proposed development at then Site repurposing an already developed site on this village edge.

5.23. Additionally, the nearby route of the North Kent railway line which the LPA recognises as a '*strong boundary*' to the land parcel area. This robust, durable physical feature is found very close to the Site, and encloses and restricts views of the open countryside beyond the Site.

5.24. As highlighted above, the character and sense of enclosure around the edge of Higham or open nature across the wider countryside varies across the quantum of Parcel 3. The land at the Site is in mixed use with the existing buildings being used for a mix commercial and domestic purposes and the surrounding land being used for temporary storage and animal grazing. Through its enclosed nature and intervisibility with neighboring residential built form and the wider village of Higham, the Site is considered to be adjoined by countryside and has development present.

5.25. Given this, BLADE considers that the Site area (within the wider Parcel 3) makes a more limited contribution to this Green Belt function. Using the LPA's scoring criteria, BLADE judges that the Site makes only a ***Relatively Limited Contribution*** to assist in safeguarding the countryside from encroachment.

Green Belt Function 4: Preserve the setting and special character of historic towns

5.26. In their 2020 Green Belt Stage 2 Study, the LPA concludes that LH1 makes a Limited/No Contribution to this Green Belt function. BLADE concurs with this conclusion as the Site is not situated within, adjoining or within the vicinity of a Conservation Area. In their 2018 Stage 1 Green Belt Study, the LPA concluded for Land Parcel 3 afforded '*no real role in preserving the setting and special character of Gravesend and Northfleet.*' Overall, BLADE considers that the Site makes ***No Contribution*** to this Green Belt purpose.

6.0 CONCLUSION

- 6.1. With the publication of the revised NPPF, Grey Belt land is to be regarded as Grey Belt if it is previously developed land or if it is land that does not strongly contribute to any of green belt purposes (a) (check the unrestricted sprawl of large built-up areas) (b) (prevent neighbouring towns merging into one another) or (d) (preserve the setting and special character of historic towns).
- 6.2. Through our own site-specific assessment, BLADE has considered the Site against the wider area of the Parcel 3 - North and West of Higham. Through using the LPA's methodology used in 2018 Gravesham Green Belt Study, the Site affords only a ***Relatively Limited Contribution*** to Green Belt purpose 3, and ***No Contribution*** to Green Belt purposes 1,2 and 4; see Table BLA 6.1 for a summary:

Table BLA 6.1: Summary of BLADE's Site-specific revies against the Green Belt as appraised by Gravesham Borough Council for Parcel 3 North and West of Higham, Gravesham Green Belt Study Stage 1 (2018) and LHJ1 from the Gravesham Green Belt Study Stage 2 (2020)

Green Belt function	Gravesham Borough Council (Stage 1 2018) Parcel 3 North and West of Higham (circa 330 Hectares)	Gravesham Borough Council (Stage 2 2020) LH1	BLADE (2025) Site-specific assessment (circa 1.68 Hectares)
1. <i>To check unrestricted sprawl of large built-up areas</i>	<i>Minimal/ No Contribution</i>	<i>No Contribution</i>	<i>No Contribution</i>
2. <i>To prevent neighbouring towns merging into one another</i>	<i>Significant Contribution</i>	<i>Relatively Limited Contribution</i>	<i>No Contribution</i>
3. <i>To assist in safeguarding the countryside from encroachment</i>	<i>Significant Contribution</i>	<i>Relatively Limited Contribution</i>	<i>Relatively Limited Contribution</i>
4. <i>Preserve the setting and special character of historic towns</i>	<i>No Contribution</i>	<i>No Contribution</i>	<i>No Contribution</i>

6.3. Given our Site-specific assessment, BLADE considers that it would be appropriate to consider the Site area as Grey Belt land within the wider Parcel 3 North and West of Higham and more localised LH1. Consequently, it is judged that the release of the Site for development would not lead to any significant harm to the wider Green Belt area, which is also supported by the LPA in their 2020 Stage 2 Green Belt Study, whereby they concluded:

'A more limited release that only took in Buckland Farm, adjacent dwellings to the north and south of Chalk Road and land to the east contained between the farm buildings and the settlement edge, would be contained on two sides by urbanising development and strongly bound to the north by the railway line. The existing buildings would provide an edge to the west, limiting the weakening of the integrity of adjacent Green Belt land. As such, the harm to Green Belt purposes would be reduced to low-moderate. Harm of releasing this would also be low-moderate.'

6.4. Proposals on Grey Belt land will no longer be classed as 'inappropriate development' and will not have to demonstrate Very Special Circumstances in order to be approved, subject to so-called 'Golden Rules' aimed at ensuring Green Belt release brings with it schemes with high levels of affordable housing, related infrastructure and open space. In Landscape terms, the latter can be realised through appropriate masterplan which focusses on a landscape, ecology and environmental benefits retaining and bolster landscape resources and afford new opportunities for green infrastructure and enhancing public access.

6.5. The site has the potential to provide permanent, defensible boundaries to maintain a sense of openness in the wider Green Belt area. Consequently, the effect of developing the site would be 'benign', rather than 'harmful' to the functionality and openness of the Green Belt.

6.6. Overall, it is considered that the site could be removed from the Green Belt entirely and be developed, without adversely impacting the function of the Green Belt.

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