

# Medway Green Belt Review



**Medway Council   December 2018**

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## **1.0 Introduction**

### **1.1 Purpose of Assessment**

This Green Belt Review has been produced as part of the evidence base to inform the production of new Green Belt policies to be captured in the emerging Local Plan for Medway. The Review provides an independent and objective appraisal of Metropolitan Green Belt land within Medway and assesses this land against the fundamental aim and purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF). The Review also provides a summary of the history and context of the Metropolitan Green Belt within Medway. Separate sections are devoted to planning background and a proposed methodology.

The purpose of a Green Belt Review is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy; planning authorities may then take this into account, alongside other evidence, in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. A Green Belt Assessment may conclude that no changes are appropriate. The results of this review will help to inform the options for accommodating growth within Medway and detailed changes to the Green Belt boundaries and site allocations, if required by exceptional circumstances.

This review is a technical evidence base document that specifically considers the single aspect of Green Belt. This study does not therefore allocate land for development nor does it, in itself, remove land from the Green Belt. The findings of this review and other technical work being undertaken will be considered together, along with any other material considerations, in the selection of potential development sites that will be set out in the new Local Plan.

### **1.2 Key objectives**

- To assess whether Medway's Green Belt as currently defined accords with the fundamental aim of Green Belt policy which is to keep land permanently open;
- To assess whether Medway's Green Belt as currently defined fulfils the five purposes of Green Belt policy as set out within the NPPF;
- To consider other factors including boundary anomalies, 'washed over' and inset areas and local planning considerations.

### **1.3 History of the Green Belt**

The concept of Green Belt dates back to the origins of the modern British planning system and is frequently credited as one of its most notable achievements, halting the outward 'sprawl' of London into the countryside. The basic concept of Green Belt was established back in 1902 by Ebenezer Howard in *Garden Cities of Tomorrow*. The Metropolitan Green Belt, first suggested by Raymond Unwin in 1933 as a 'green girdle' and defined by Patrick Abercrombie in the Greater London Plan of 1944 (later established in the Town and Country Planning Act of 1947), curtailed the further unchecked growth of London's urban area. There have been a number of changes to policy in the intervening years but the basic concept has remained intact to this date. The outer boundaries of the Metropolitan Green Belt in Kent were defined in the Kent Countryside Local Plan in 1983, with subsequent minor alterations made to the boundary in Medway.

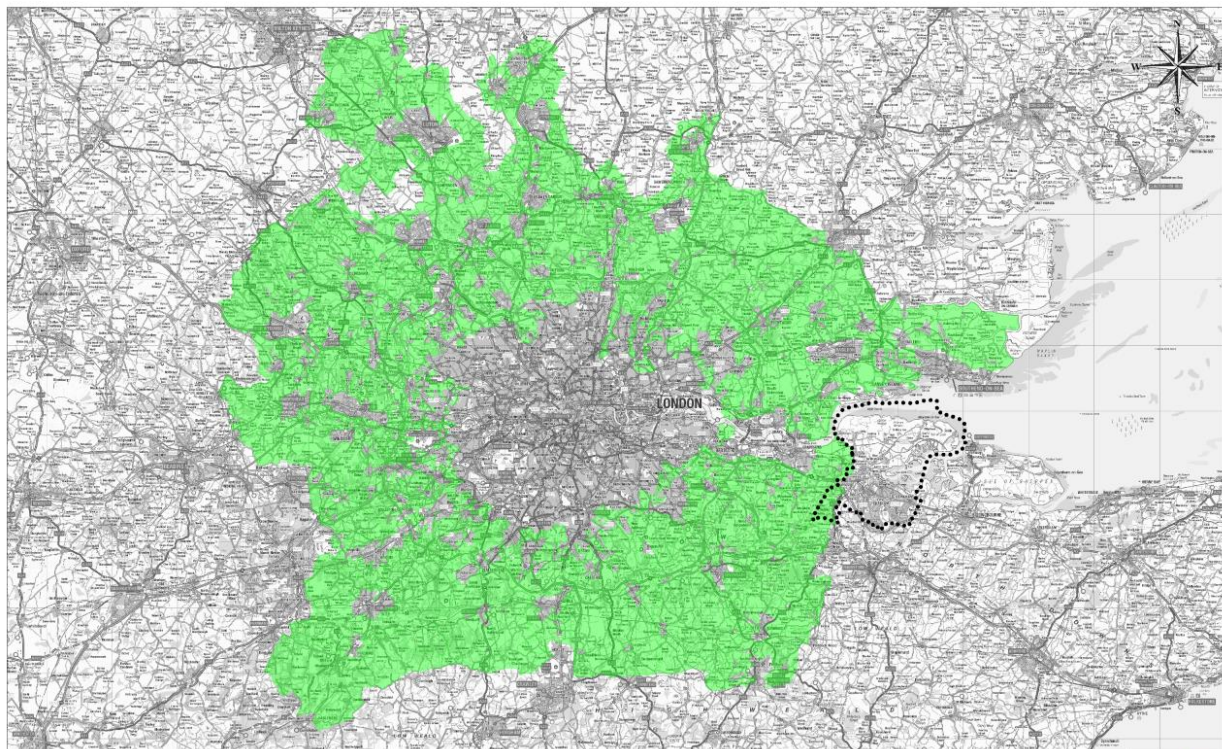
### **1.4 Context**

The extent of Green Belt land within Medway is relatively small (4.98% of land area). The outer ring Metropolitan Green belt largely terminates along the western boundary of the borough, with some limited intrusion inside the borough. The neighbouring boroughs with contiguous green belt are Gravesham and Tonbridge and Malling. Both these boroughs have more extensive tracts of Green Belt with their boundaries. Gravesham is undertaking a Green Belt Assessment to inform work on its Site

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Allocations and Development Management Policies document. Tonbridge and Malling completed a Green Belt Study (Parts 1-5) in September 2016<sup>1</sup>.

In the wider metropolitan green belt strategic context, it is important to highlight one significant consideration. The gap between the Medway and Gravesham urban areas is considerably narrowed by the urban extension of Dartford and Gravesham. The narrowness of this gap can be clearly seen on the Metropolitan Green Belt map (see Fig. 1). Relative to the extent of green belt surrounding the rest of London, this is by far the narrowest section of Metropolitan Green Belt.



*Fig 1* Metropolitan Green Belt

<sup>1</sup> Available at: [https://www.tmbc.gov.uk/data/assets/pdf\\_file/0017/243008/Green\\_Belt\\_Study\\_2016\\_Part1.pdf](https://www.tmbc.gov.uk/data/assets/pdf_file/0017/243008/Green_Belt_Study_2016_Part1.pdf)

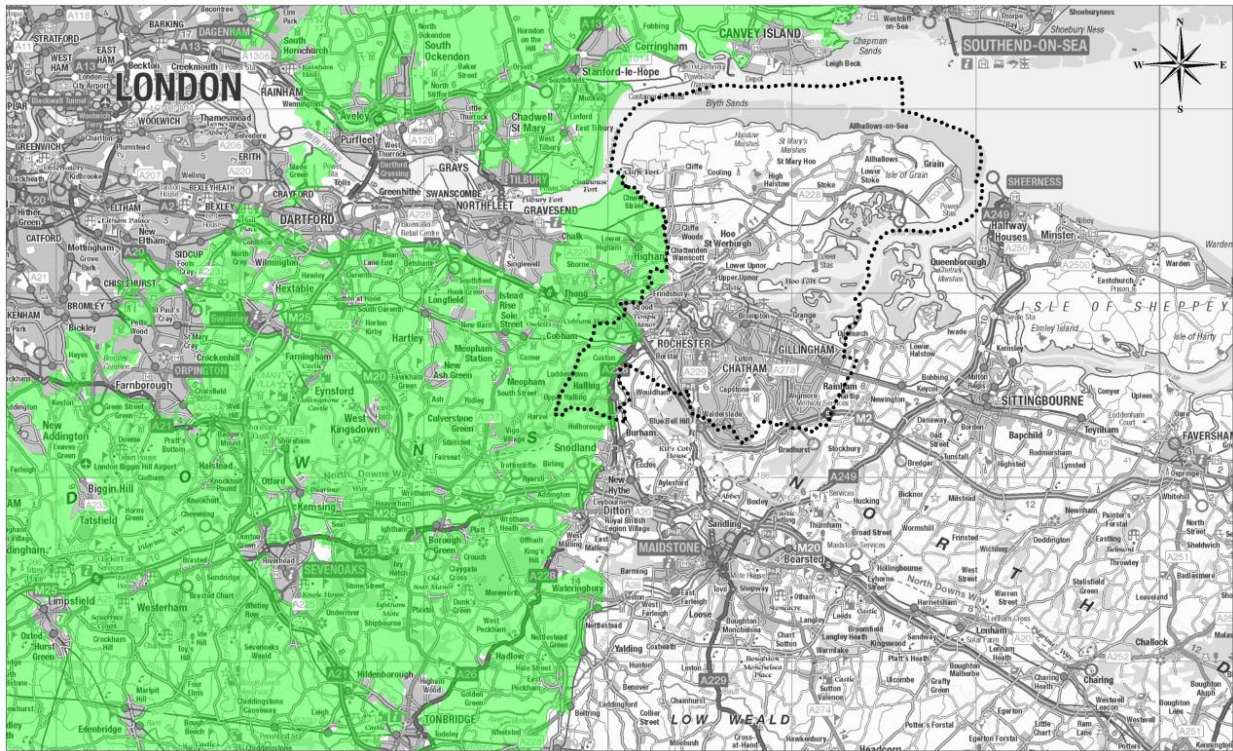


Fig 2 Metropolitan Green Belt – North West Kent

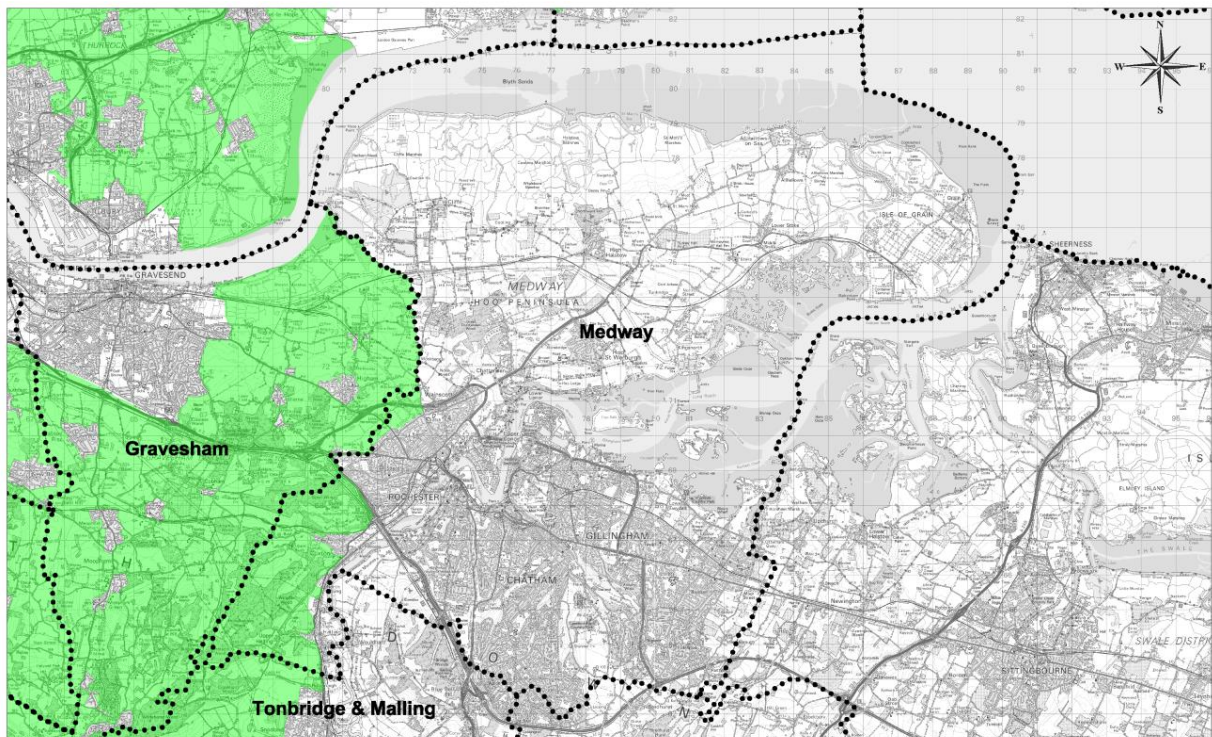


Fig 3 Metropolitan Green Belt – Medway

## 2.0 Planning Background

### 2.1 National Policy

The National Planning Policy Framework (NPPF)<sup>2</sup> requires Medway Council, as a local Planning Authority to prepare a Local Plan that is positively prepared with the objective of delivering sustainable development and provides a platform for local people to shape their surroundings.

Medway Council Local Plan should include strategic policies that set out an overall strategy for the pattern, scale and quality of development and make provision for:

- Housing (including affordable housing), employment, retail, leisure and other commercial development;
- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- Community facilities (such as health, education and cultural infrastructure); and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measure to address climate change mitigation and adaptation.

Local Plans will be examined by an independent Inspector, appointed by the Secretary of State to determine if the plan is 'sound'. A 'sound' plan must be positively prepared, justified, effective and consistent with national policy.

### 2.2 Green Belt National Policy

The National Planning Policy Framework (NPPF) states that the Government attaches great importance to Green Belts, with the fundamental aim being to prevent urban sprawl by keeping land permanently open and to identify the essential characteristics of Green Belts as being their 'openness' and 'permanence'. It sets out the five key purposes which the Green Belt serves:

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

In terms of plan-making, the NPPF requires local planning authorities with Green Belts in their area to establish boundaries in their Local Plans. It is acknowledged that the general extent of Green Belts across the country is already established. Once in place, these should only be altered in exceptional circumstances which are fully evidenced and justified, through the preparation or updates of plans. The NPPF does not define exceptional circumstances, however it does set out what aspects of the proposed development strategy should be considered before a local planning authority can conclude that there

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<sup>2</sup> Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

are justified circumstances. This includes making better use of suitable brownfield sites and increasing density in appropriate locations well served by public transport. The revised NPPF also refers to the Duty to Cooperate and associated statement of common ground between neighbouring planning authorities on the ability to accommodate some identified need for development.

In reviewing Green Belt boundaries, the NPPF requires local planning authorities to consider their permanence for the long-term and endurance beyond the plan period. Local planning authorities should also take account of the need to promote sustainable patterns of development and the consequences of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

The NPPF provides specific guidance which local planning authorities should follow when defining boundaries, including the need to:

- Ensure consistency with the development plan's strategy for meeting sustainable development needs
- Define boundaries clearly, using physical features which are recognisable and permanent.

The NPPF also encourages plan-making authorities to consider, where necessary, identifying safeguarded land to meet future development needs (beyond the plan period), so that they can be satisfied that Green Belt boundaries will not need to be changed again at the end of the plan period.

In exceptional circumstances, the NPPF allows for the identification of new Green Belt and sets out a series of criteria<sup>3</sup> which local planning authorities should demonstrate if such an approach is proposed.

## **2.3 Local Policy**

### **2.3.1 Medway Local Plan (2003)**

In Kent, the Metropolitan Green Belt has helped to preserve open countryside between the edge of Greater London and the urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. At a local level, it has helped to separate the urban areas of Strood and Gravesend and preserve a band of open countryside, interspersed only by smaller rural settlements.

The Council's current Development Plan consists of the Medway Local Plan 2003 Saved Policies and Local Plan Proposals Map. The Saved Policies have been saved from the Medway Local Plan 2003 following a Direction issued by the Secretary of State. The Direction included a list of the policies that could be saved and have the status of adopted local planning policies.

Of particular relevance to this study is Policy BNE30 and the Proposals Map which define the Medway's Green Belt boundaries. The extent of the Green Belt is well established and has remained unaltered since 1990 (Kent Structure Plan).

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<sup>3</sup> NPPF, 2018, paragraph 135

When the 2003 Local Plan was adopted, it was not considered at the time that any exceptional circumstances existed to justify alteration to the Green Belt boundary previously shown in the 1992 Medway Towns Local Plan.

The assessment of parcels within this document includes reference to the policies in the 2003 Medway Local Plan. The council acknowledges that these policies are under review through the preparation of the new Local Plan.

### **2.3.2 Medway Local Plan 2018-2035** The emerging Local Plan

The council has carried out three formal stages of consultation ('Regulation 18') to inform the strategy and policies for the new Medway Local Plan. A broad evidence base is also being collated. Details of the emerging work and evidence base are available on the council's website at:

<https://www.medway.gov.uk/futuremedway>.

The council is now preparing a draft local plan for publication in 2019. This will set out the proposed development strategy and include site allocations. If there is evidence based justification for any alteration to the Green Belt, the draft plan will show detailed changes to boundaries, if required. The options for accommodating growth, changes to Green Belt boundaries (if required) and the allocation of sites will be informed by a number of matters. These are wide ranging but will include: the extent to which the areas contribute to the purposes and aims of the Green Belt (ie. the results shown in this document); landscape capacity and sensitivity; access to and capacity of services/infrastructure; and impacts on biodiversity.

## **2.4 Duty to co-operate**

Local planning authorities now hold the responsibility for strategic planning following the revocation of regional strategies in the Localism Act 2011. The NPPF identifies that 'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy'<sup>4</sup>. Further requirements are placed on local planning authorities to produce statements of common ground on defined strategic matters to advance and deliver the Duty to co-operate. It is noted that the Green Belt has been identified as a significant cross border matter between Medway and Gravesham councils, and raised in representations to consultations on the authorities' respective development plans.

It is important to understand the approach taken to Green Belt issues by neighbouring local authorities with contiguous Green Belt land. Where Green Belt Assessments have been completed or are in progress, understanding the methodology employed and approach taken is necessary to ensure a level of consistency. It is also helpful to understand how neighbouring authorities have divided their Green Belt for assessment so that 'parcels' may be aligned where possible. The status to Green Belt Reviews in neighbouring authorities is summarised in Table 1.

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<sup>4</sup> NPPF, 2018, paragraph 26

*Table 1* Green Belt status in neighbouring authorities

Local Authority	Green Belt Review	Date completed
Gravesham Borough Council	Green Belt Assessment under preparation	To be confirmed
Tonbridge & Malling Borough Council	Green Belt Study, Parts 1-5	Published September 2016

## 2.5 Supporting Guidance

### 2.5.1 Planning on the doorstep – the big issues – Green Belt *Planning Advisory Service, February 2015*

This document provides useful supporting guidance. It was prepared within the context of the NPPF published in 2012. Although the NPPF has been updated, the principles of policy for Green Belt remain largely consistent. The revised NPPF sets out policy for protecting Green Belt land in chapter 13. The following points are relevant:

1. The most immediate issue for the Green Belt is the maintenance of the purposes of the Green Belt set against the under-provision of housing across many parts of the country, where the capacity to accommodate sustainable development in urban areas is often insufficient to meet the housing requirement. National planning policy makes provision for changes to be made to the Green Belt. Critically, changes to the Green Belt are made through the local plan. In order to make a change to the Green Belt boundary in the local plan there have to be 'exceptional circumstances'. Housing (or employment land need) can be an exceptional circumstance to justify a review of your Green Belt boundary. (p.4)
2. The purpose of a review is for the identification of the most appropriate land to be used for development, through the local plan. Always being mindful of all of the other planning matters to be taken into account and most importantly, as part of an overall spatial strategy (p.7).

## 3.0 Methodology

### 3.1 Introduction

The NPPF sets out the fundamental aim of Green Belt policy as preventing urban sprawl by keeping land permanently open (para 133). This is overarching and the five purposes of Green Belt (para 134) sit below this. The NPPF also makes clear that the Green Belt boundary can only be reviewed through the plan making process, i.e. through the preparation of the Local Plan. In reviewing the Green Belt boundary the NPPF sets out the consideration of Green Belt permanence and therefore its endurance beyond the lifetime of the plan in addition to other criteria set out in the preceding paragraphs, which have been used to inform this process.

In addition to the NPPF criteria, guidance on Green Belt review from the Planning Advisory Service (PAS)\* has also been considered; a ‘best practice’ review has been undertaken; this has included liaison with neighbouring local authorities.

This review considers:

- The identification of land parcels and the process of selecting them
- The definition of Green Belt boundaries
- The ‘washed over’ and inset status of settlements
- The relevance and applicability of the Green Belt Policy criteria against the local context
- A criteria based approach to the assessment of land parcels

### 3.2 Baseline data

The following mapping provides valuable baseline data to support analysis of existing green belt boundary designation:

- The wider context (figs 1 and 2)
- Medway Green Belt boundary (fig 3)
- Medway Green Belt parcels (fig 4)
- Detailed parcel maps (figs 5-8)
- Environmental constraints (Appendix B)

### 3.3 Liaison with neighbouring authorities

Medway’s Green Belt land is situated to the western edge of the borough and defines the outer edge of the London Metropolitan Green belt. The land area affected is relatively small compared with the neighbouring boroughs of Gravesham and Tonbridge and Malling and there are significant areas of overlap, particularly with Gravesham. Both boroughs have commenced Green Belt assessment work.

Duty to co-operate liaison has commenced with neighbouring authorities. This has included consultation on the methodology adopted within this review. This will be followed up by further consultation on the outcomes of the assessment work that has been undertaken.

### 3.4 Land parcel identification

Green Belt land within Medway is located in the following areas:

- Land to north west of Strood (north of M2) – extending to district boundary (parcels 1 & 2)
  - Land to north west of Cuxton and Halling (south of M2) (parcels 3-5)
-

A total of five separate land parcels have been identified (see fig 5). The delineation of these parcels has been arrived at through a process that has included:

- Desktop analysis of mapping data, including OS mapping and aerial photos;
- Site survey work and local knowledge
- Discussions with neighbouring authorities on their Green Belt Assessment methodologies
- Well defined physical features, such as roads and rail lines (which provide distinct and permanent edges that help define the extent of the parcels)

The defined parcels are intended to be strategic enough to inform the next version of the Local Plan and yet small enough to inform the site allocations and address potential Green Belt boundary anomalies (as per para 139 of NPPF). All sites were surveyed in 2017.

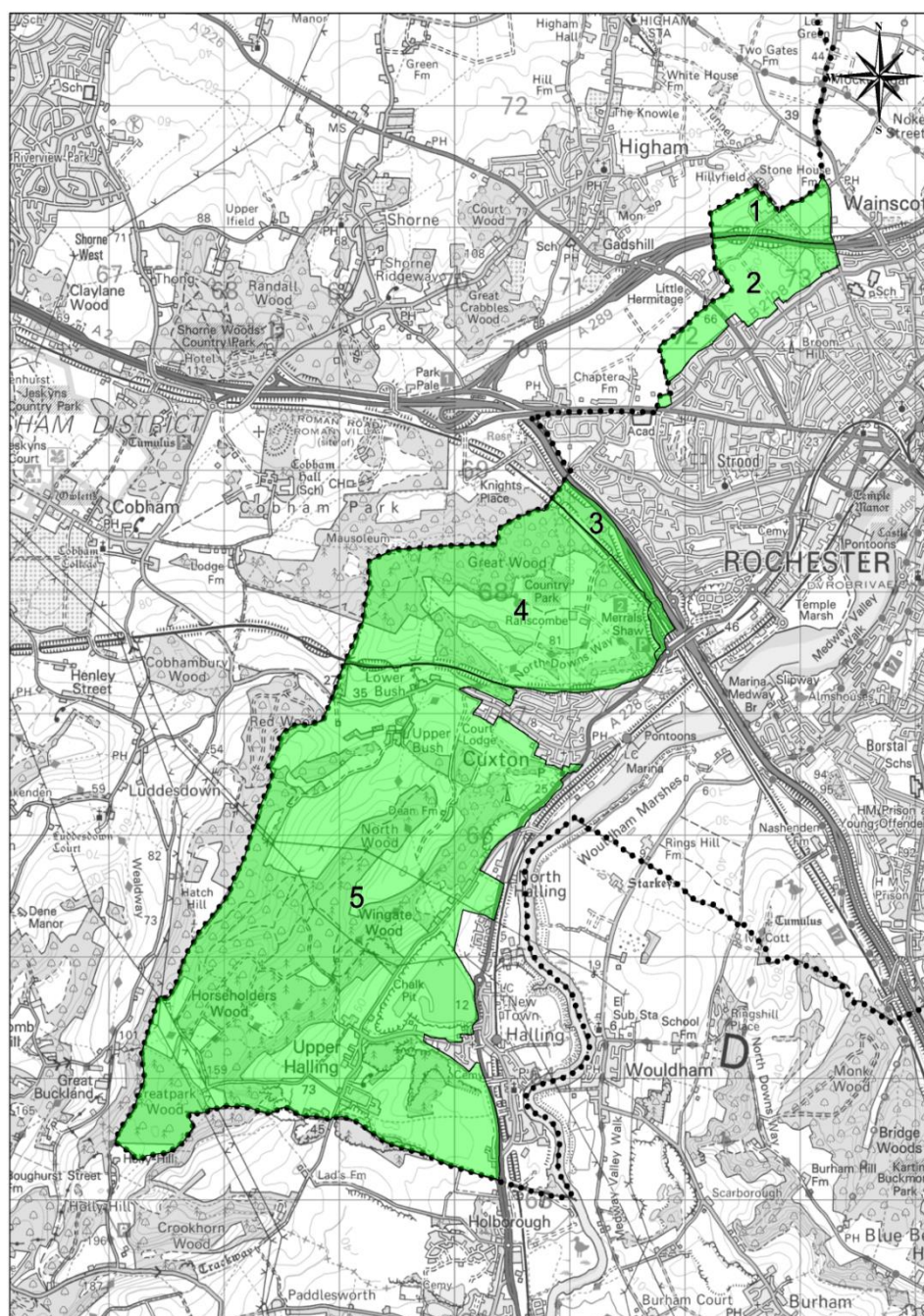


Fig 4 Medway Green Belt land parcels

### 3.5 Green belt boundaries

Para 139 of the NPPF states that boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent. This review will assess the consistency of land parcel boundaries with this consideration in mind.

The Green belt boundary to the north of Strood (Stone House Farm to Higham Creek) terminates at the administrative boundary between Medway and Gravesham. This Green Belt boundary has been assessed separately (see Section 6.0) to ensure consistency with para 139. The results of this assessment will be subject to further discussions with Gravesham Borough Council to ensure consistency of approach.

### 3.6 'Washed over' and 'Inset' status of settlements

Para 140 of the NPPF states that 'If it is necessary to prevent 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. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.' The relevance of NPPF policy in relation to any currently 'inset' areas – eg. the villages of Cuxton and Halling – and 'washed over' settlements – eg. Upper Halling and Upper Bush – will be assessed as part of this Green Belt Review to either inform a boundary review or the preparation of appropriate policies to protect villages whichever is the appropriate means of protection.

### 3.7 Green Belt Policy Criteria

The primary and overarching concern of Green Belt Policy is to preserve the openness and permanence of designated land (see para 133 of NPPF).

#### 3.7.1 Green Belt Purposes

The Green Belt serves five purposes (see para 134 of the NPPF). These are considered separately.

##### ***Purpose 1 To check the unrestricted sprawl of large built-up areas***

The Medway Green Belt boundary forms the outer edge of the London Metropolitan Green Belt. The purpose as defined in the NPPF refers to 'large built up areas' and in this respect the borough's Green Belt plays a localised role in containing the outward growth of existing urban settlements. For the purposes of this study 'large built up areas' has been taken as the urban extremities of Strood. Smaller village settlements such as Cliffe Woods, Cuxton and Halling are not included within this category.

##### ***Purpose 2 To prevent neighbouring towns merging into one another***

Green Belt plays a strategic role in maintaining separation between main towns. In the case of Medway and Gravesham this applies particularly to the gap between the urban edge of Medway to the west and north west of Strood and the urban edge of Gravesend. As highlighted in section 1.4, this is a particularly narrow gap within the context of the full extent of the Metropolitan Green Belt. This gap also highlights the more local role of Green Belt in preventing incremental coalescence of individual urban settlements and villages.

Snodland (within Tonbridge & Malling borough) lies immediately to the south of the Medway urban area with intervening urbanised settlements at Cuxton and Halling. The Green Belt (alongside other designations) has played a useful role in managing expansion of these villages and reducing the risk of incremental coalescence between Strood and Snodland.

***Purpose 3 To assist in safeguarding the countryside from encroachment***

Encroachment is defined as the gradual advancement of urbanising influences; also ‘advancement beyond usual or acceptable limits’. The main consideration should be whether the rural character of the area would be threatened or overwhelmed by urbanising influences.

***Purpose 4 To preserve the setting and special character of historic towns***

Planning on the Doorstep (PAS 2015) states that Purpose 4 ‘... is generally accepted as relating to very few settlements in practice. In most towns there already are more recent developments between the historic core, and the countryside between the edge of the town.’

The historic cores of the towns of Rochester and Strood are far removed from the Green Belt boundary. Cuxton has no recognised historic core. Halling has a Conservation area at its core but this has been enveloped within more recent development and is separated from the Green Belt boundary by a railway line. Other heritage assets (eg. Listed buildings, Scheduled Ancient Monuments) which often occur randomly, are adequately protected under separate legislation. Within the Medway Green Belt Review, this purpose is not considered relevant and has been discounted.

***Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land***

It is the overall restrictive nature of Green Belt that, through its limitation of the supply of other development opportunities, encourages regeneration and re-use of land. It is therefore impossible to judge how any given parcel of land would contribute to the fulfilment of this purpose.

Planning on the Doorstep (PAS 2015) states re. Purpose 5 that ‘... 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. 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.’

Whilst the overarching importance of Purpose 5 at a regional level is acknowledged, it is not considered helpful in considering the relative value of land parcels. For this reason it has been discounted.

### **3.7.2 Other factors**

Other relevant Green Belt issues that are highlighted within the remaining parts of chapter 13 of the NPPF (paras 135-147) have been considered as follows:

A separate assessment template (see Appendix D) is provided to review clarity of existing boundaries, inset and washed over settlements and other planning considerations. It is intended that this, alongside the assessment of Purpose and Aims will support changes to anomalous boundaries where relevant.

### 3.8 Parcel Assessment

#### 3.8.1 Appraisal criteria

The following considerations will be applied in the assessment of each Green Belt parcel. Each Green Belt purpose and policy aim is assessed as being of equal significance. Key terms are defined in Appendix A. Decision aiding considerations are as follows:

Aims & Purpose of Green Belt	Assessment considerations
<b>Purpose 1</b> To check the unrestricted sprawl of large built-up areas	<ul style="list-style-type: none"> <li>Is the parcel at the edge of one or more large built up areas?</li> <li>Does the parcel prevent the outward sprawl of a large built up area into open land?</li> <li>Is the parcel part of a wider group of parcels that directly act to prevent urban sprawl?</li> <li>Do the Green Belt boundary edges of the parcel form a distinctive break between urban areas and countryside? Include description of existing built development, urbanising or fringe uses.</li> </ul>
<b>Purpose 2</b> To prevent neighbouring towns from merging into one another	<ul style="list-style-type: none"> <li>Does the parcel lie directly between two towns and form all or part of a gap between them?</li> <li>Would development in the parcel result in the merging of towns?</li> <li>Is the parcel part of a wider group of parcels that directly act to prevent the merging of neighbouring towns?</li> </ul>
<b>Purpose 3</b> To assist in safeguarding the countryside from encroachment	<ul style="list-style-type: none"> <li>Does the parcel assist in safeguarding the countryside from encroachment (terms as defined in Appendix A)?</li> <li>Are there clear, strong and robust boundaries to contain development and prevent encroachment in the long term?</li> <li>Describe the character of the countryside within the parcel. Include description of land uses, built development, urbanising or fringe uses</li> </ul>
<b>Purposes 4 &amp; 5</b>	<ul style="list-style-type: none"> <li><u>Assessment is not made against these purposes – see item 3.7</u></li> </ul>
<b>To prevent urban sprawl by keeping land permanently open</b> (para 133 of NPPF)	<ul style="list-style-type: none"> <li>Does the parcel (along with contiguous Green Belt parcels where relevant) address the fundamental aim of Green Belt Policy</li> </ul>

Table 2 Decision aiding criteria

#### 3.8.2 Templates

A Purpose and Aims assessment template table (see Appendix C) is provided to support the site assessment process. This is to be read in the context of the baseline data (maps, appendices and text) provided within the report. The template lists the key purposes and aims of Green Belt Policy, for assessment against a series of appraisal criteria.

A professional judgement is made on the contribution made by each parcel to the purposes and aims, based on one of the following categories and including consideration of other relevant factors.

<b>High</b> contribution to the purpose and fundamental aims of the Green Belt	<b>H</b>
<b>Moderate</b> contribution to the purpose and fundamental aims of the Green Belt	<b>M</b>
<b>Low</b> contribution to the purpose and fundamental aims of the Green Belt	<b>L</b>

A separate template (see Appendix D) considers matters relating to the definition of boundaries, 'inset' and 'washed over' settlements and considers the robustness of the existing boundaries and whether

individual parcels may contain boundary anomalies. A series of decision making criteria are provided to ensure consistency and all matters are considered in the context of chapter 13 of the NPPF.

**Note:** Green Belt Assessment is not an assessment of landscape quality, although elements of landscape assessment assist in assessing the Green Belt (for example, in identifying potential new boundaries or differentiating between areas of unspoilt countryside or semi-rural areas).

### 3.8.3 Summary sheets

Each parcel is considered under the following headings:

#### Parcel Description

This section includes a description of the location of the parcel and its contextual relationship with neighbouring green (and non-green) belt land. Key land use and topography features are summarised.

#### Purpose and aims

This section provides the Green Belt contribution assessment results. These are based on the methodology outlined within this section of the Review.

#### Boundary anomalies

The Medway Green Belt boundary has been comprehensively surveyed on site. Any relevant boundary anomalies are summarised here.

#### Washed over and inset areas

Any proposed changes to the Green Belt in relation to these categories are described here

#### Other planning considerations

Existing designations, safeguarded land, existing permissions and any other relevant planning considerations are summarised in this section.

#### Recommendations

Recommendations are put forward based on the options described in Section 3.10

## 3.9 Results and Recommendations

The potential assessment outcomes are described below (Table 3). Results of High (H) and Moderate/High (M/H) are considered to be significant. These results would support a decision to make no change to the principle of Green Belt. A tabular summary of assessment results is provided in Section 5.

Table 3 Assessment outcomes

<b>H</b>	High
<b>M/H</b>	Moderate/High
<b>M</b>	Moderate
<b>M/L</b>	Moderate/Low
<b>L</b>	Low

Following completion of the assessment work, recommendations for each parcel are put forward based on one of the following options<sup>1</sup>:

1. No change to Green Belt
2. No change to principle of Green Belt but adjustments to address boundary anomalies<sup>2</sup>
3. No change to principle of Green Belt but adjustments to 'inset' or 'washed over' status of settlements<sup>3</sup>
4. Removal of part of Parcel from Green Belt <sup>4</sup>

5. Removal of whole Parcel from the Green Belt
6. Addition of new Green Belt

<sup>1</sup> Please note item 2.3.2 of this Green Belt Review re. consultation on the next version of the Local Plan

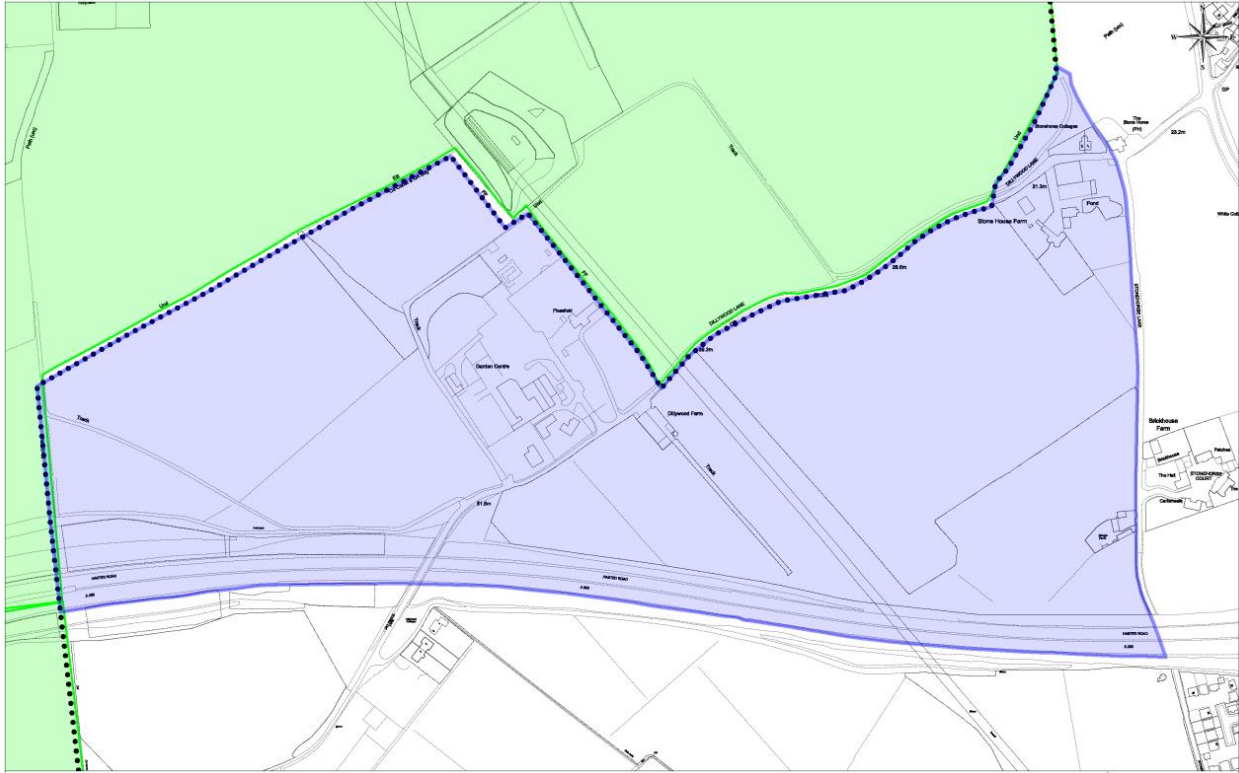
<sup>2</sup> All cross border related boundary changes subject to discussion with relevant neighbouring local authority.

<sup>3</sup> All inset or 'washed over' status changes subject to further review

<sup>4</sup> Items 3-6 - More substantial alterations (beyond minor Green Belt boundary anomaly change) will need to be supported by a strong evidence base justifying a 'exceptional circumstances' case.

## 4.0 Parcel assessment

### 4.1 Land Parcel 1



*Fig 5*

#### 4.1.1 Description

This parcel is situated to the north of the A289. This parcel should be viewed integrally with Parcel 2. It forms part of a larger tract of Green Belt land which extends beyond the district boundary into Gravesham (to the north and west). The Green Belt boundary to the east is formed by Stonehorse Lane. The green belt washes over the A289.

Land uses are predominantly agricultural (arable) with a smaller area of orchards. The field pattern is of a medium scale with the largest arable field situated to the east. Fields to the west are generally divided by poplars and shelter belts. There is a strong belt of woodland running along the northern boundary of the A289. Dillywood Garden Centre is situated towards the centre and there is a small hamlet to the east. This includes Stone House Farm, two cottages and a Public House. To the south east lies Gouge Farm and a small modern residential development. Urbanising influence of A289 to south mitigated by cutting and woodland buffer edge. The landform is gently undulating, falling away to the north west and east.

#### 4.1.2 Purpose and Aims

**Moderate/High Contribution** to Purpose and Aims of Green Belt.

#### 4.1.3 Boundary anomalies

Boundary anomaly identified at land to north of Stone House Farm where district boundary is not clearly delineated by physical features on ground. Opportunity for a proposed change to enlarge Green Belt to stronger physical boundary is shown on *Fig 12* map.

#### **4.1.4 Washed over and inset areas**

No change proposed.

#### **4.1.5 Other Planning considerations**

##### **Local Plan Policy Designations**

Protection of Open Space Policy L3; Area of Local Landscape Importance Policy BNE34; Rural Lanes BNE44

##### **Relevant Planning Decisions**

- *Water Gardens & Landscape Centre, Dillywood Lane, Higham, ME3 7NT*  
MC/10/0267 Construction of a 5 bedroomed dwelling ancillary to the garden centre with detached garage / workshop and meeting room. Refused, 02 July 2010. No appeal.

#### **4.1.6 Results and recommendation**

**Moderate/High** This contribution is considered to be significant.

**Recommendation** No change to principle of Green Belt but minor adjustments to boundary anomalies

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## 4.2 Land Parcel 2

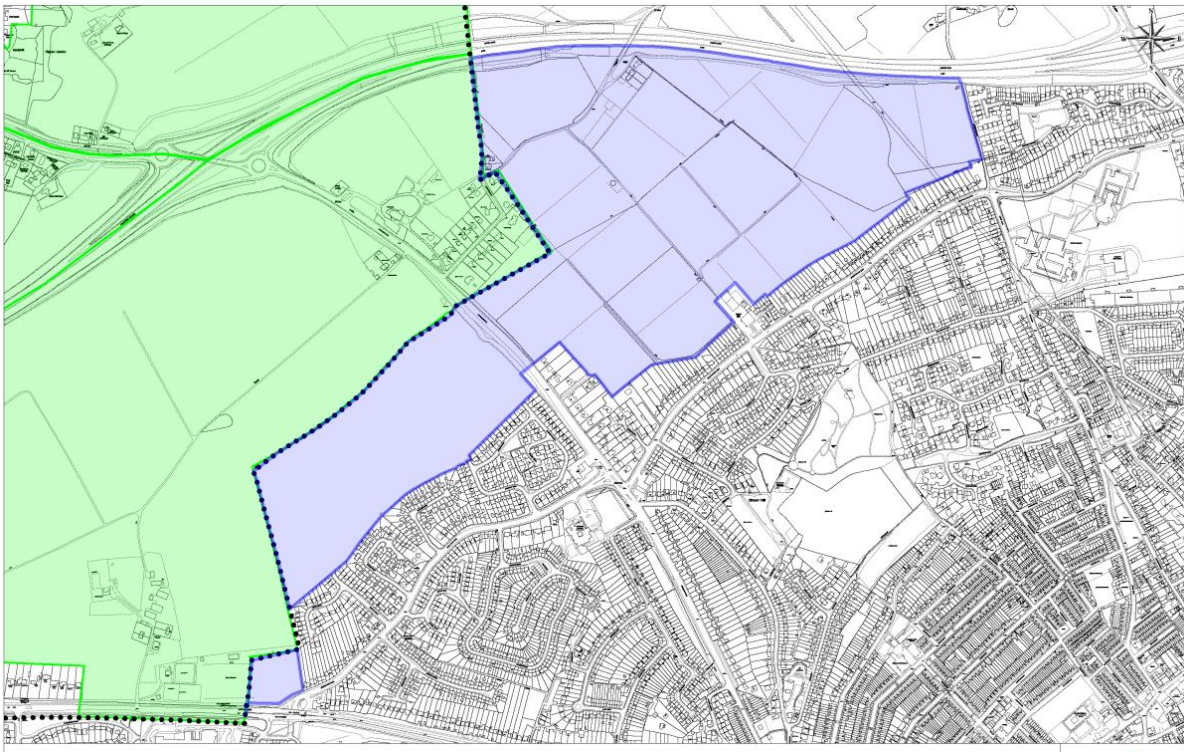


Fig 6

### 4.2.1 Description

This parcel is situated to the south of the A289. The southern edges of this parcel are bordered by the urban fringes of Strood which form Medway's Green Belt boundary within this area. This parcel should be viewed integrally with Parcel 1. It forms part of a larger tract of Green Belt land which extends beyond the district boundary into Gravesham (to the north and west). The green belt washes over the A289 and A226.

Land uses consist of a mixture of arable, horticulture and orchards. The orchard and horticultural uses are focussed to the north with arable farmland to the south and west. The land falls away gently to the north west. The landscape character changes according to land uses. The area of polytunnels to the south of Dillywood Lane is more enclosed; the arable farmland and orchard areas more open. The arable farmland to the south west (separated by the A226 and a steep embankment) is distinctly part of the wider green belt farmland extending towards the A289 and beyond. The southern corner of this parcel has recreational sports uses and includes the Rochester City Football Ground. Urbanising influence of A289 to north mitigated by cutting and planted edge.

### 4.2.2 Purpose and Aims

**High contribution** to Purpose and Aims of Green Belt.

### 4.2.3 Boundary anomalies

No boundary anomalies identified.

### 4.2.4 Washed over and inset areas

No change proposed.

#### 4.2.5 Other Planning considerations

##### Local Plan Policy Designations

Protection of Open Space Policy L3; Area of Local Landscape Importance Policy BNE34; Rural Lanes BNE44

##### Relevant Planning Decisions

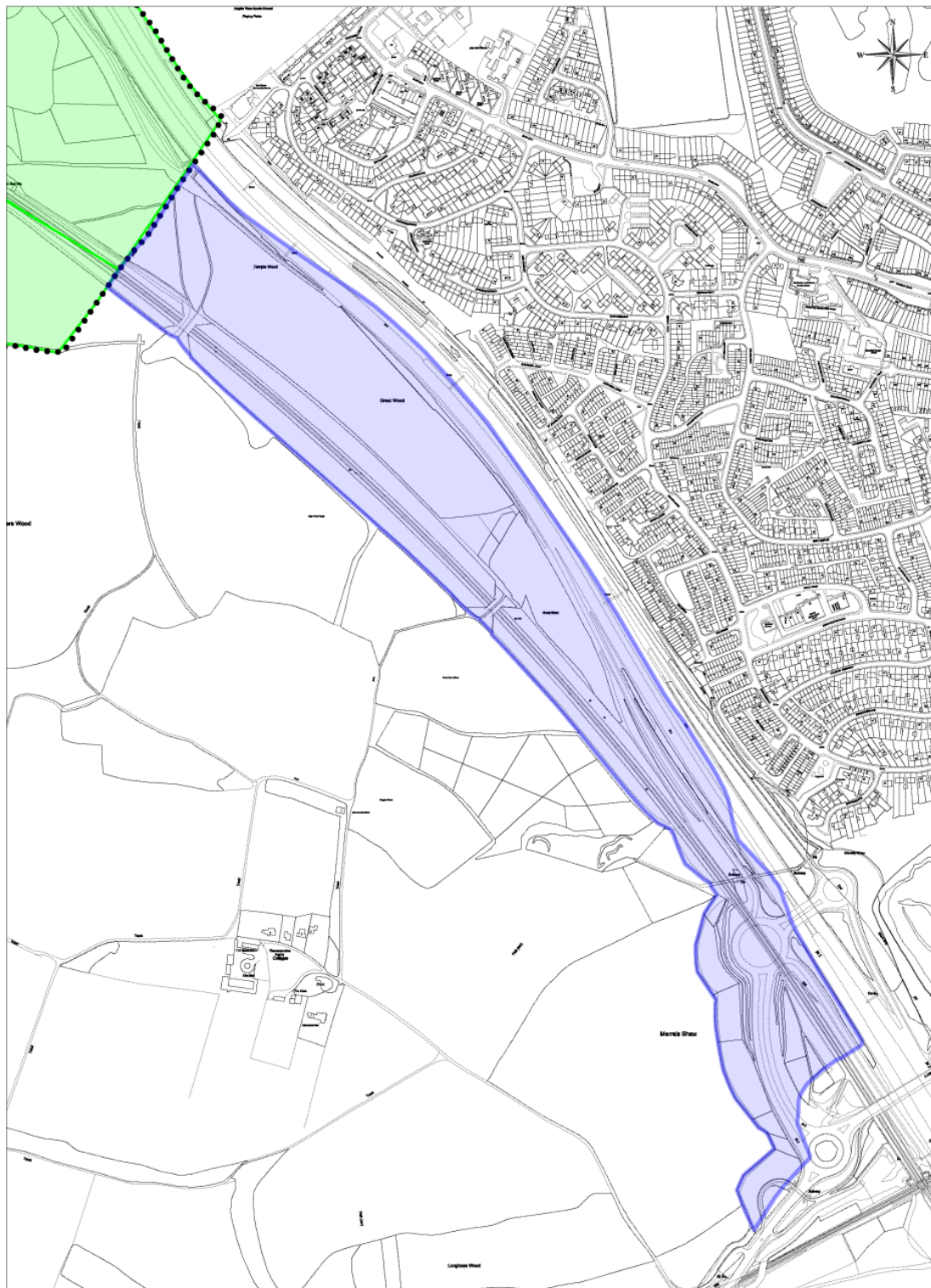
- *Brompton Farm, Brompton Farm Road, Strood, ME2 3QZ*  
MC/11/2757 Outline application for demolition of existing farm buildings and construction of 16 dwellings together with access, appearance, layout and scale and associated works. Approval subject to S.106, 04 April 2013
- *No.178 and Land North of Brompton Farm Road, Strood*  
MC/16/2917 Outline application with some matters reserved (appearance, landscaping, layout, scale) for residential development comprising of up to 135 residential dwellings with associated landscaping, public open space and associated works. Refusal, 20 January 2017. No appeal.  
MC/17/2956 Outline application with some matters reserved (appearance, landscaping, layout, scale) for residential development comprising of up to 122 residential dwellings with associated landscaping, public open space and associated works. Refused 19 April 2018. Appealed.
- *Rochester United F.C., Watling Street*  
MC/17/3121 Retrospective application for the construction of a 192 seat stand together with the installation of two portakabins for admin and football academy. Approved with Conditions, 16 April 2018

#### 4.2.6 Results and recommendation

**High** This contribution is considered to be significant.

**Recommendation** No change to Green Belt.

### 4.3 Land Parcel 3



#### 4.3.1 Description

This parcel forms a narrow sliver of land bounded by the M2 and CTRL. The north and south eastern edges of this parcel form the outer Metropolitan Green Belt boundary. Land to the south west conjoins with Parcel 4 and flows into Gravesham to the north west.

Woodland predominates as the land use within this parcel. A motorway underpass provides an important public right of way link from the urban area of Strood to the north into the AONB woodland

and chalk downland to the south. There are permissive rights of way running parallel to the motorway and CTRL line. Urbanising influences include the M2, CTRL line and A228.

As noted in relation to Parcels 1 and 2, this parcel, although assessed independently, should also be considered integrally with Parcels 4 and 5. The parcels have common features that extend into the green belt in neighbouring boroughs to the west and south.

#### **4.3.2 Purpose and Aims**

**High contribution** to the Purpose and Aims of Green Belt.

#### **4.3.3 Boundary anomalies**

Boundary anomaly identified along boundary of M2 and slip road. See Section 6.2 (fig. 13) for detail and explanation of proposed adjustments.

#### **4.3.4 Washed over and inset areas**

No change proposed here

#### **4.3.5 Other Planning considerations**

##### **Local Plan Policy Designations**

Kent Downs Area of Outstanding Natural Beauty BNE32 and; North Downs Special Landscape Area BNE33; Designated Country Park L9; Proposed Road Schemes T19, T20

##### **Relevant Planning Decisions**

None relevant

#### **4.3.6 Results and recommendation**

**High** This contribution is considered to be significant.

**Recommendation** No change to principle of Green Belt but minor adjustments to boundary anomalies

## 4.4 Land Parcel 4

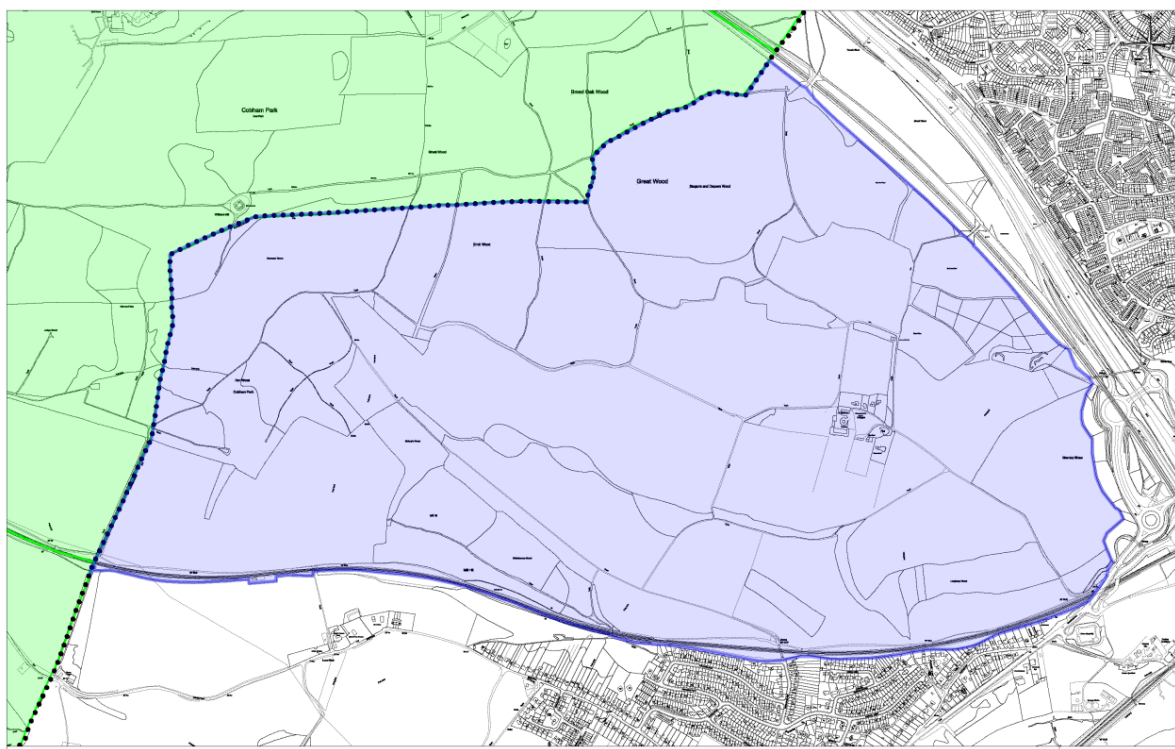


Fig. 8

### 4.4.1 Description

This is an extensive land parcel with Ranscombe Farm Reserve at its heart. The railway line and northern edges of Cuxton define the southern edge of this parcel. The village of Cuxton is inset and forms the outer boundary of the Green Belt.

This parcel is predominantly rural in character. It has characteristic features of North Downs landscape comprising rolling chalk downland, dry valleys and wooded shaws. There is a small farmstead at the heart of the area, recently converted to residential uses. Urbanising influences lie predominantly to the south and east (when considered in conjunction with Parcel 3). These influences include CTRL, Strood railway line, Cuxton urban edge, M2 slip road and A228.

Ranscombe Farm Reserve is managed by Plantlife, with the support of Medway Council. The Reserve is predominantly consistent with this Green Belt parcel (with a small extension beyond the district boundary to the north and a small contraction within the district boundary to the west).

Characteristic features of the area include some large blocks of woodland, particularly to the north, as well as areas of grassland and arable farmland. The Reserve is managed primarily for biodiversity conservation and informal public recreation. Active management includes coppicing and management of woodland open space, grazing and other forms of grassland management, and cultivation to favour the rare cornfield wildflowers for which the site is nationally important. Ten miles of paths and ten different entrance points are maintained and kept safe and passable, with substantial lengths open to horse and cycle use. Commercial arable farming remains a significant use of the site, and some commercial rearing of livestock also occurs, both delivered by a tenant farmer.

As noted in relation to Parcels 1 and 2, this parcel, although assessed independently, should also be considered integrally with Parcels 3 and 5. The parcels have common features that extend into the green belt in neighbouring boroughs to the west and south.

#### **4.4.2 Purpose and Aims**

**High contribution** to the Purpose and Aims of Green Belt.

#### **4.4.3 Boundary anomalies**

No boundary anomalies identified. Note suggested Parcel 3 changes.

#### **4.4.4 Washed over and inset areas**

No change proposed here

#### **4.4.5 Other Planning considerations**

##### **Local Plan Policy Designations**

Kent Downs Area of Outstanding Natural Beauty BNE32 and; North Downs Special Landscape Area BNE33; Sites of Special Scientific Interest/National Nature Reserve BNE35 (excluding areas below Mean High Water); Designated Country Park L9; Channel Tunnel Rail Link: Safeguarded Route T8; Proposed Road Schemes T19, T20

##### **Relevant Planning Decisions**

In recent years a number of planning applications have been submitted and approved for smaller scale developments within the curtilage of the original Ranscombe farmstead.

#### **4.4.6 Results and recommendation**

**High** This contribution is considered to be significant.

**Recommendation** No change to Green Belt.

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## 4.5 Land Parcel 5

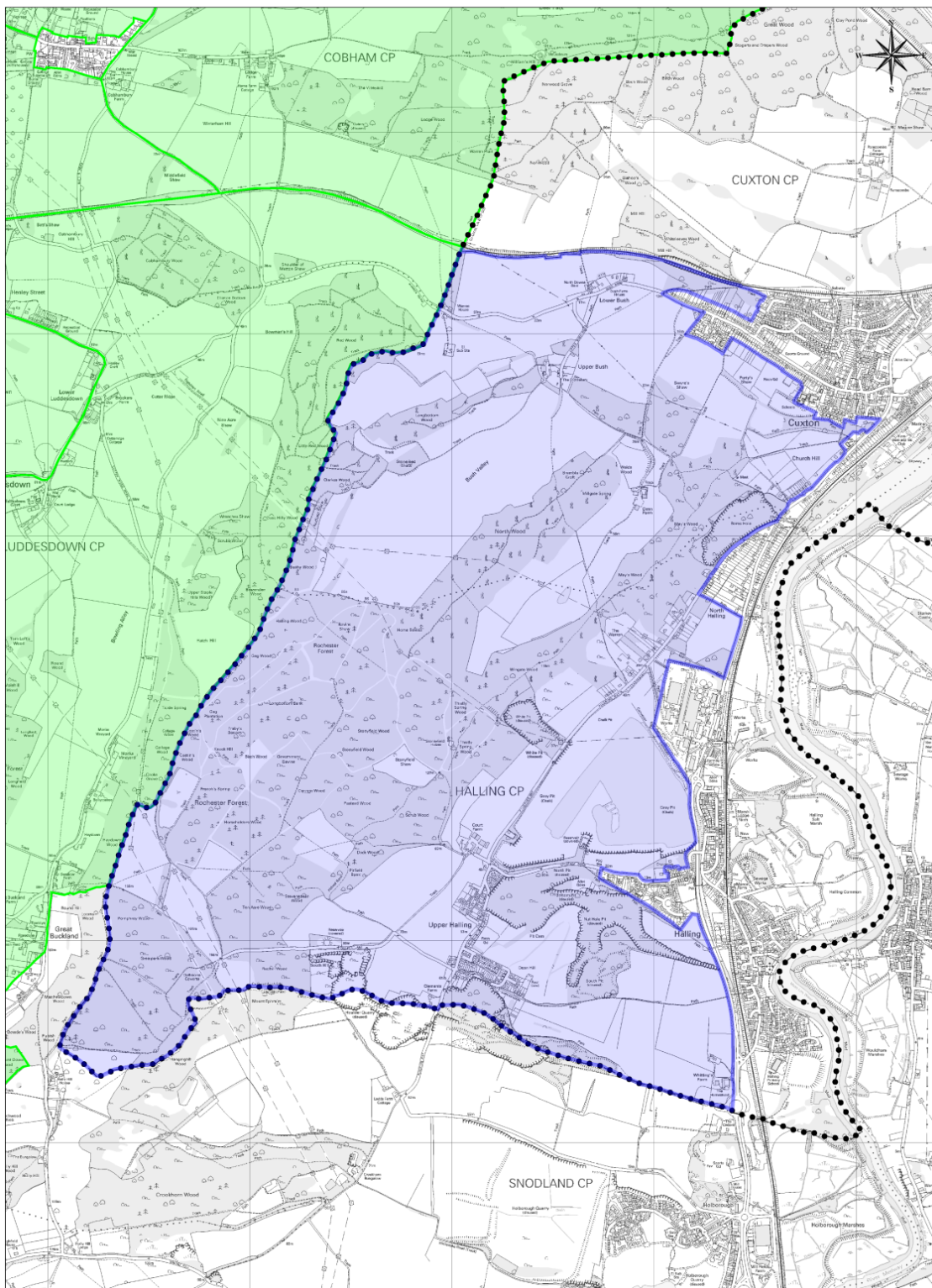


Fig. 8

### 4.5.1 Description

This is the largest of the three contiguous land parcels (nos 3, 4 & 5). The eastern edges of this parcel bound the A228 and the urban edges of Cuxton and Halling and form the outer Metropolitan Green Belt

boundary. Green Belt land to the south flows into Tonbridge and Malling and to the west into Gravesham.

Large land parcel, characterised by steep wooded scarp slope; arable fields enclosed by strong woodland blocks and wooded shaws; steep rolling dry valleys set within dip slope of North Downs. Other features include Pilgrims way which rises from the A228 at North Halling (where it is fringed with ribbon development) and travels in south westerly direction. Former cement works at North Halling now modern residential development. This is inset from the Green Belt but lake to south and large field to the north are 'washed over'. Large disused and fenced off quarry situated immediately to south of Lower Halling. Another disused quarry (Houlder) located to south of Upper Halling on district boundary with Tonbridge and Malling. Both quarries and the small hamlet of Upper Bush 'washed over' by Green Belt. Urbanising influences predominate to east along Green Belt boundary at A228 and Cuxton/Halling.

#### **4.5.2 Purpose and Aims**

**High contribution** to the Purpose and Aims of Green Belt.

#### **4.5.3 Boundary anomalies**

No boundary anomalies identified – note Parcel 3 changes, which are contiguous to this parcel

#### **4.5.4 Washed over and inset areas**

It was not considered by the assessors that the open character of Upper Halling makes an important contribution to the openness of the Green belt and that the character of the village could be protected by other means – ie. the village envelope designation. It was noted that similar sizes of settlement within Gravesham are inset. It is recommended that Upper Halling is inset from the Green Belt according to the village envelope boundary.

#### **4.5.5 Other Planning considerations**

##### **Local Plan Policy Designations**

Upper Bush Conservation Area BNE12, BNE13, BNE14, BNE15; Scheduled Ancient Monument BNE20; Kent Downs Area of Outstanding Natural Beauty BNE32 and; North Downs Special Landscape Area BNE33; Sites of Special Scientific Interest/National Nature Reserve BNE35 (excluding areas below Mean High Water);

Sites of Nature Conservation Interest and/or Local Nature Reserve BNE36 (existing/proposed); Proposed Community Forest or Woodland BNE44; Rural Lanes BNE47

##### **Relevant Planning Decisions**

- *St Andrews Park, Formby Road, Halling (Former Cement Works, Halling); Northern Field*  
MC/12/1791 Hybrid application for outline details for demolition of existing buildings and provision of employment up to 3,000sqm floorspace (B1, B2, B8), doctors surgery up to 1,000sqm (D1) and/or a 40 unit extra care facility, pub/restaurant up to 850sqm (A3/A4), new pedestrian/cycleway bridge across A228; alterations to public highway; sports pitches and ancillary structures including means of access with all other matters reserved. Full details for 385 residential dwellings including demolition of existing structures, vehicular access and landscaping; open space; nature conservation facilities; ground modelling and earthworks and ancillary buildings. Approval With Conditions, 29 August, 2013

MC/14/1486 Variation of conditions 5, 39 and 40 of planning permission MC/12/1791 - condition 5 to enable changes to the approved residential layout and change 23 of the approved house types; and conditions 39 and 40 to include balancing ponds, foul pumps and revised Flood Risk Assessment as approved under MC/14/0121. Approval With Conditions, 15 August, 2014.

- *98 Pilgrims Road, Upper Halling*

MC/17/3288 Retrospective application for the formation of a riding ménage to the rear. Approved with Conditions, 22 December 2017

- *Land Rear Of 106,108,110,112 and 114 And Adjacent 98 Pilgrims Road, Upper Halling*

MC/17/3788 Retrospective application for construction of an access road and driveway. Approved with Conditions, 18 January 2018

- *Dean Farm Cottage, Bush Road*

MC/18/0236 Change of use from outbuilding to a 2 bedroom dwelling. Refused, 28 November 2018

- *Keepers Barn, Upper Bush Farm Road, Upper Halling*

MC/18/1405 Change of use of redundant agricultural barn to a residential dwelling. Pending Decision

- *M.C.L Ltd, Grove Road, Upper Halling*

MC/18/2040 Outline planning application with some matters reserved (access, appearance, landscaping and scale) for the demolition of existing industrial buildings, builders yard and the construction of 11 dwellings, associated parking, car ports and access. Pending Decision

#### **4.5.6 Results/analysis**

**Moderate/High** This contribution is considered to be significant.

**Recommendation** Adjustments to 'inset' or 'washed over' status of settlement for further consideration.

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## 5.0 Assessment Summary

### 5.1 Introduction

Parcels 1 & 2 and Parcels 3,4 & 5 have been split primarily in order make the assessment process more manageable. They are contiguous and form continuous belts of green belt land that flow across boundaries into neighbouring districts. The assessment process views the parcels independently but with due consideration of this wider context.

### 5.2 Site Survey work

The parcel and boundary survey work was undertaken in June, July and August 2017. Four site survey visits were undertaken by the Council's Landscape Officer and a Planning Policy Officer. The review of Medway Green Belt land was guided by the methodology described in this report. All Green Belt land was reviewed in terms of definition by strong and permanent physical features. Survey visits included a review of the robustness of the green belt boundary between Stone House Farm and Higham Creek; green belt land that defined by the district boundary but outwith the borough. Gravesham Planning Policy Team will be consulted on any proposed adjustments in this area.

All site visits included discussion of green belt related issues and the completion of the purpose and aims pro formas for each land parcel. A separate pro forma considered other related matters including the robustness of the current Green Belt boundary in the context of paras 136 and 139 of the NPPF; inset and washed over settlements and other planning considerations. A comprehensive photographic site record was produced.

### 5.3 Assessment Results – Summary Table

Parcel	Description	Purpose 1	Purpose 2	Purpose 3	Aims	Summary
1	Land to north of A289 Wainscott Bypass. Extends to district boundary - north	M	M	H	H	<b>M/H</b>
2	Land north of Brompton Farm Road and south of A289 Extends to district boundary - west	H	M	H	H	<b>H</b>
3	Land between M2 and CTRL. Extends to district boundary – north	H	M	H	H	<b>H</b>
4	Land between CTRL and Strood/Sole Street rail line. Extends to district boundary – west	H	M	H	H	<b>H</b>
5	Land south of Strood/Sole Street rail line and west of A228. Extends to district boundary - south and west	M	M	H	H	<b>M/H</b>

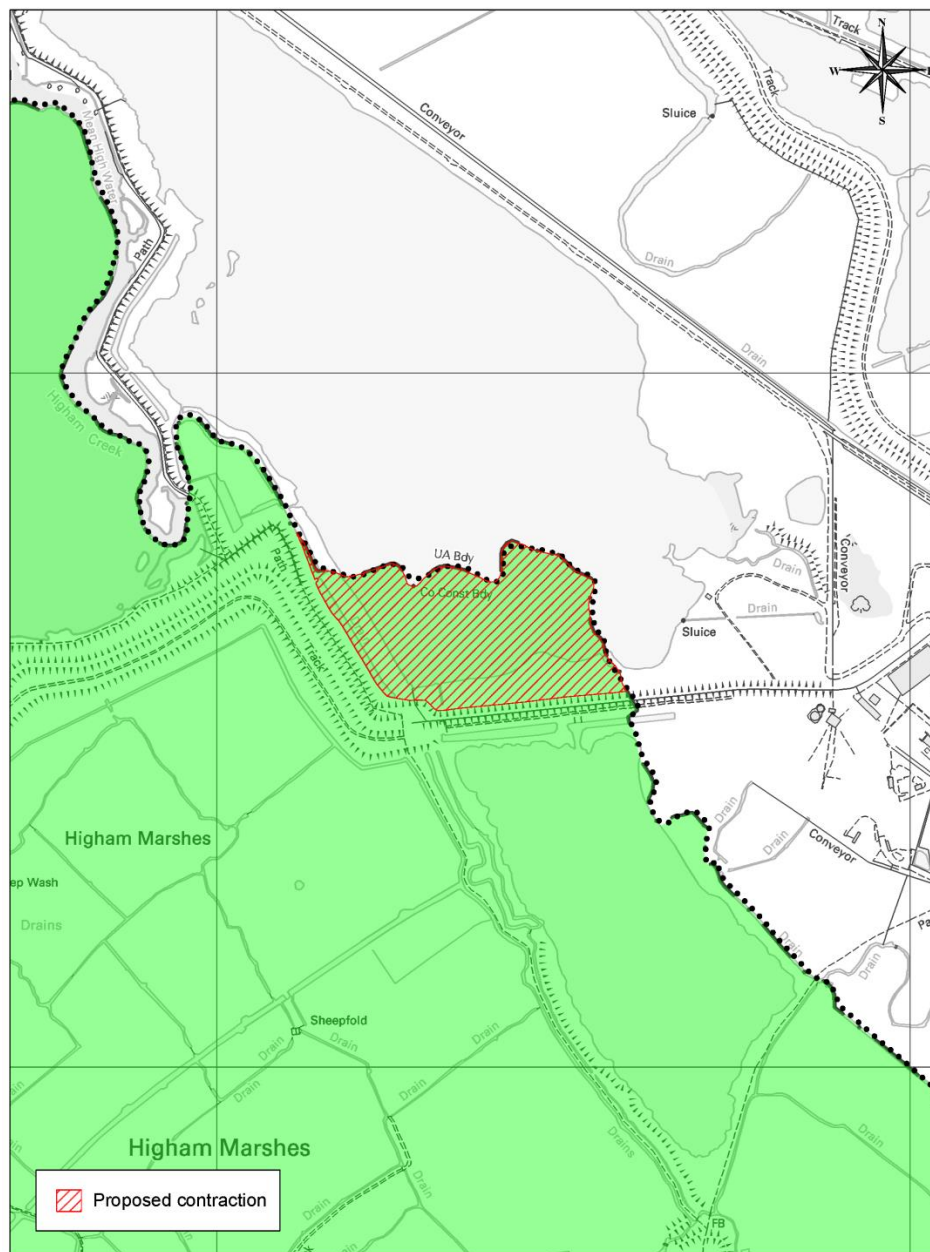
*Table 4* Summary of assessment results

## 6.0 Boundary anomalies

### 6.1 District boundary

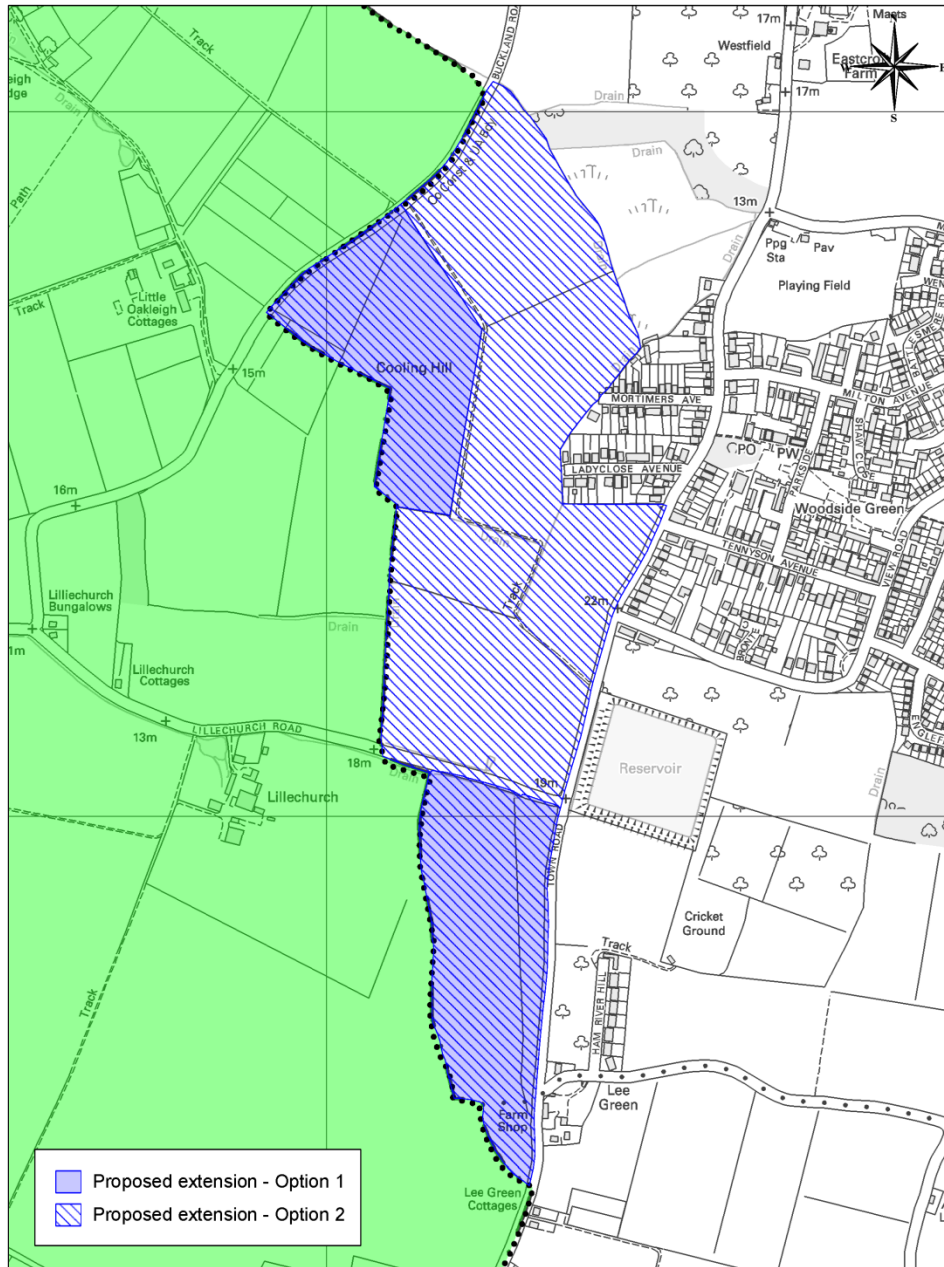
There is no Green belt land within Medway to the north of Strood - between Stone House Farm and Higham Creek. The Green Belt boundary in this section is synonymous with the district boundary between Gravesham and Medway.

A comprehensive survey of this boundary has been undertaken, In order to ensure that it is clearly defined by distinctive physical features - as per NPPF guidance. This survey work has identified some anomalies. Proposed amendments/options are listed and mapped below (see figs 10-12):



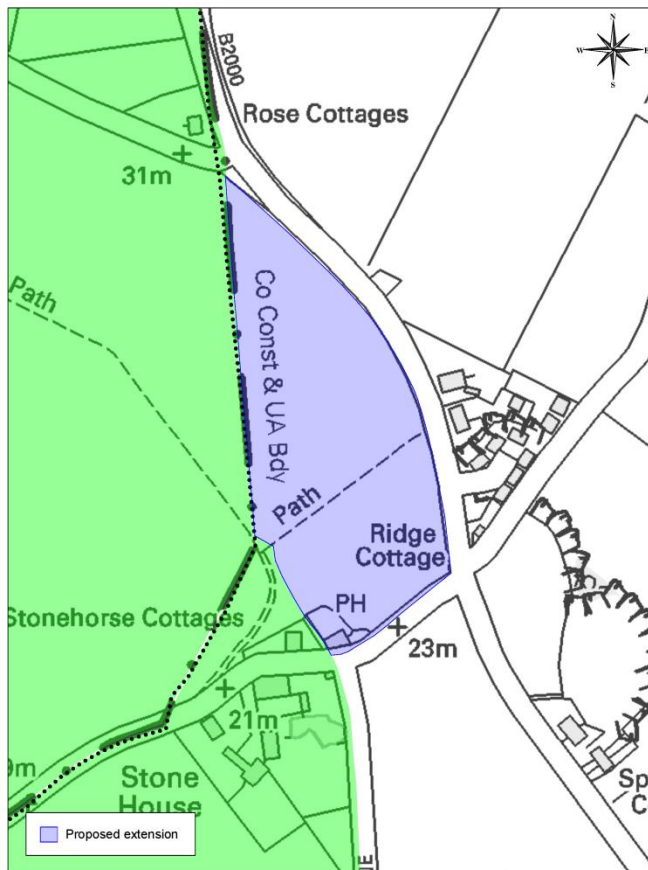
*Fig 10* Land at Higham Creek. The district boundary currently extends into the waterbody at Alpha Lake. This edge is not clearly defined by physical features.

**Recommendation:** Minor contraction to green belt boundary to follow edge of water body.



*Fig 11* Land to west of Cliffe Woods. The district boundary offers poor physical definition at Cooling Hill and land to south of Littlechurch Road and west of Town Road.

**Recommendation:** Fig 11 describes two options. Option 1 involves minor adjustments to provide stronger physical edges. Option 2 includes Option 1 but proposes a more significant adjustment, extending the green belt to follow a very strong existing field boundary and then heading south, following the developed edge of Cliffe Woods and strong physical edge of Town Road.

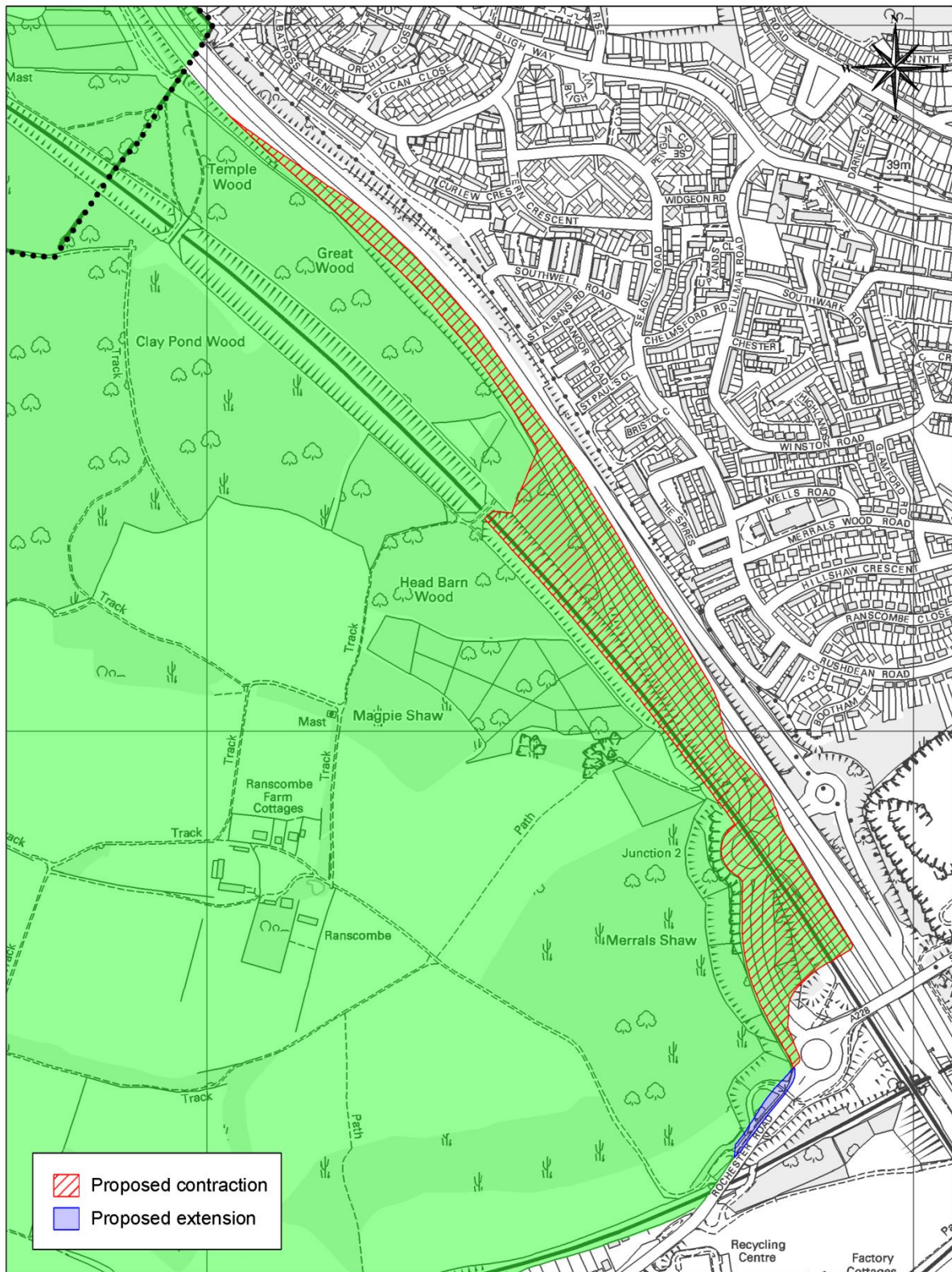


*Fig 12* Land to north east of Stone House Farm. The district boundary along this edge does not coincide with any clear physical boundary (ie. it runs across a field).

**Recommendation:** Extend Green Belt to follow Dillywood Lane and B2000

## 6.2 Parcel 3 – boundary anomaly

See Section 4.3 for contextual detail relating to this land parcel



**Fig 13** Land to west of M2. There are inconsistencies in the Green belt boundary mapping along the eastern edge of this parcel. The Green Belt overlaps the M2 and some of the slip road.

**Recommendation:** Adjust Green Belt boundary to clearer physical boundaries as indicated on fig 13 proposals.

## 7.0 Appendices

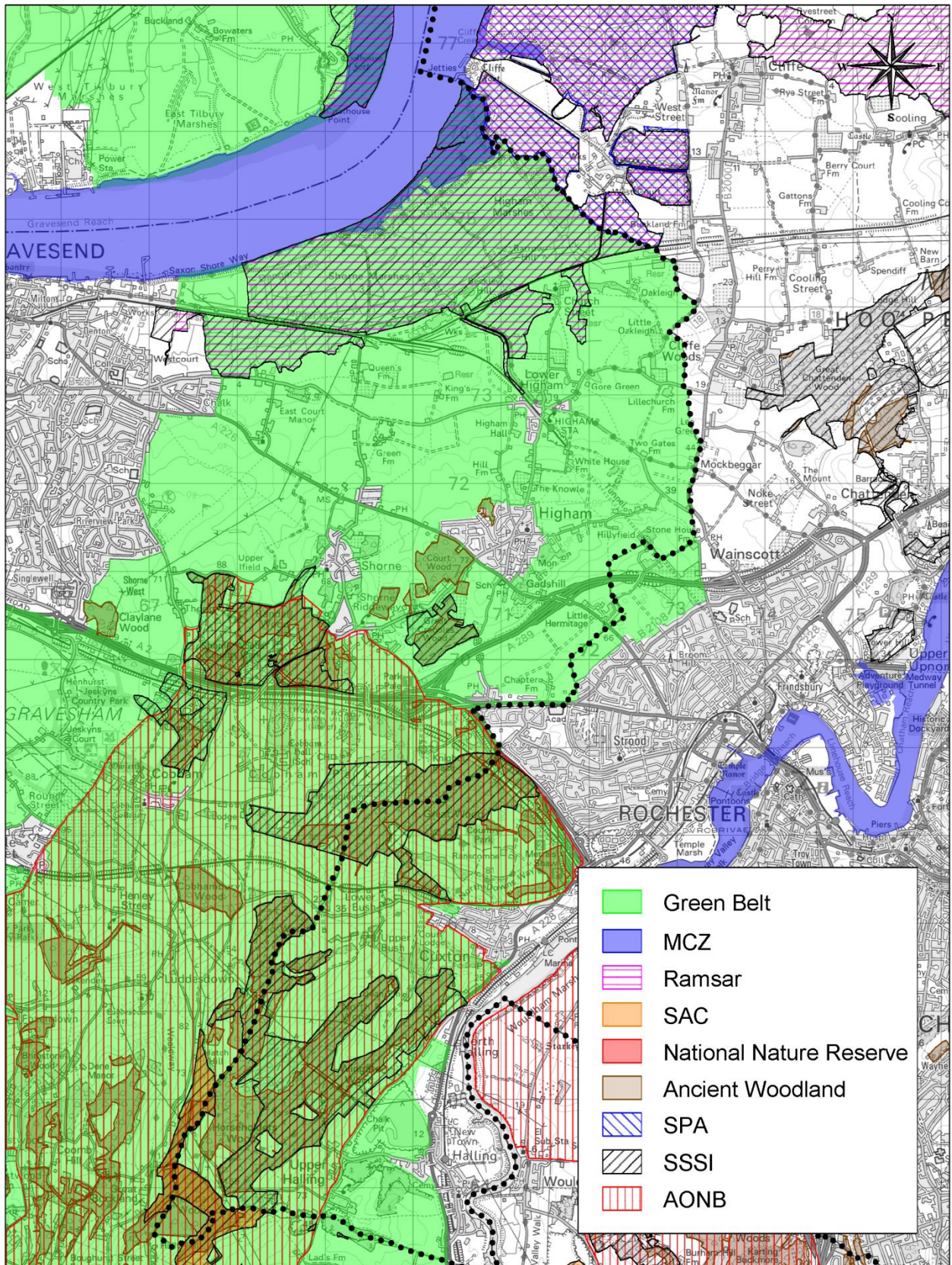
### Appendix A

#### Definition of Terms

Term	Definition
Sprawl	The outward spread of a built up area at its periphery in an untidy, sporadic, dispersed or irregular way
Large Built-up areas	In the context of this study this refers to Greater London. The Metropolitan Green Belt was designated with the primary purpose of the containment of London. It also refers to major settlement areas within Medway and neighbouring local authorities as identified within their Local Plans
Neighbouring Towns	The larger settlements in the borough – ie. the five Medway Towns of Strood, Rochester, Chatham, Gillingham and Rainham, as defined in the Local Plan
Historic Towns	There is no dictionary or Historic England definition of 'Historic Towns'. A town is defined by the OED as 'A built-up area with a name, defined boundaries, and local government, that is larger than a village and generally smaller than a city.' The definition of historic town within Medway has been taken to apply to the historic cores of Strood, Rochester, Chatham, Gillingham and Rainham.
Merging	'Combine or cause to combine to form a single entity; to blend or cause to blend gradually into something else so as to become indistinguishable from it' – Oxford Online Dictionary (OD). This can be by way of 'sprawl' or 'ribbon development'.
Countryside	Those parts of the borough lying outside the confines of the urban areas, rural service centres and other rural settlements as defined in the Local Plan; pastoral and agricultural land uses likely to dominate although there may be urban influences
Encroachment	A gradual advancement of urbanising influences through physical development or land use change. See also Oxford Online Dictionary 'Advance gradually beyond usual or acceptable limits'
Openness	Land that is open and largely uninterrupted by any significant built development. Views and visibility may be a factor in forming an assessment.
Permanence	'The state or quality of lasting or remaining unchanged indefinitely' – Oxford Online Dictionary

## Appendix B

### Environmental designations



**Appendix C**

## Pro forma template – Assessment of Green Belt Purposes and Aims

Parcel	Purpose	Appraisal considerations	Assessment	Additional Comments	Contribution*
	<b>Purpose 1</b> To check the unrestricted sprawl of large built-up areas	Is the parcel at the edge of one or more large built up areas?			
		Does the parcel prevent the outward sprawl of a large built up area into open land?			
		Is the parcel part of a wider group of parcels that directly act to prevent urban sprawl?			
		Do the Green Belt boundary edges of the parcel form a distinctive break between urban areas and countryside? Include description of existing built development, urbanising or fringe uses.			
		<b>Overall contribution</b>			

Parcel	Purpose	Appraisal considerations	Assessment	Additional Comments	Contribution*
	<b>Purpose 2</b> To prevent neighbouring towns from merging into one another	Does the parcel lie directly between two towns and form all or part of a gap between them?			
		Would development in the parcel result in the merging of towns?			
		Is the parcel part of a wider group of parcels that directly act to prevent the merging of neighbouring towns?			
		<b>Overall contribution</b>			

Parcel	Purpose	Appraisal considerations	Assessment	Additional Comments	Contribution*
	<b>Purpose 3</b> To assist in safeguarding the countryside from encroachment	Does the parcel assist in safeguarding 'the countryside' from 'encroachment' – terms as defined in Appendix A.			
		Are there clear, strong and robust boundaries (eg. river, road, railway, urban edge) to contain development and prevent encroachment in the long term?			
		Describe the character of the countryside within the parcel. Include description of land uses, built development, topography, urbanising or fringe uses.			
		<b>Overall contribution</b>			

- High / Moderate/Low

Parcel	Characteristics	Appraisal considerations	Assessment	Additional Comments	Contribution*
	<b>To prevent urban sprawl by keeping land permanently open</b> (para133 of NPPF)	Does the parcel (along with contiguous Green Belt parcels where relevant) address the fundamental aim of Green Belt Policy			
		<b>Overall contribution</b>			

\* High / Moderate / Low

## Appendix D

### Pro forma template – Boundaries and washed over settlements

Parcel	Criteria	Appraisal considerations	Assessment	Boundary anomalies (list/mark on plan)
	<b>Boundaries</b> (paras 136 & 139 of NPPF)	Are the Green Belt parcel boundaries capable of enduring beyond the development plan period?		
		Is there any land within the parcel boundaries that is considered unnecessary to keep permanently open?		
		Does the parcel have clear and recognisable physical boundaries and features that are likely to be permanent?		
		Are there any discrete or wholesale areas within this land parcel that may be considered sufficiently well contained in terms of man made or natural features – eg. landform, infrastructure, built development – to consider them worthy of exclusion from existing Green Belt land?		
		Are there any areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer term development needs beyond the plan period?		
	<b>'Inset' and 'washed over' settlements</b> (para 140 of NPPF)	Are the washed over/inset areas best protected 'by other means'; whereby they can be excluded from the Green Belt?		
	<b>Other planning considerations</b>	Are there any extant permissions, existing designations or future commitments that could influence this Green Belt review?		