

HALLAM LAND

HOLBOROUGH QUARRY

MEDWAY GREEN BELT AND LANDSCAPE CHARACTER ASSESSMENT REVIEW

ISSUE: Friday, 08 August 2025

CLIENT Hallam Land

PROJECT Holborough Quarry

REPORT TITLE Medway Green Belt and Landscape Character Assessment Review

DJA Reference: 2874-4-1-TD-0002-S5-P2 Holborough Quarry Medway GB and LCA Review 080825

Revision: P2

Issue Date: Friday, 08 August 2025

REPORT REVISIONS

Revision	Date	Description	Prepared	Approved
P1	30/07/2025	Draft	PG	PG
P2	08/08/2025	Issue	PG	PG

CONTENTS

1. INTRODUCTION4

2. GREEN BELT POLICY7

3. MEDWAY COUNCIL GREEN BELT ASSESSMENT9

4. CROSS BOUNDARY CONSIDERATIONS6

5. GREY BELT7

6. LANDSCAPE CHARACTER ASSESSMENT9

7. SUMMARY.....12

Appendices:

- 1. Concept Masterplan
- 2. Holborough Quarry Green Belt Review (DJA September 2024)
- 3. Holborough Quarry Landscape Appraisal and GI strategy (DJA November 2024)

1. INTRODUCTION

- 1.1 David Jarvis Associates Limited (DJA) is instructed by Hallam Land (in partnership with Tarmac and Holcim UK) to provide advice on Green Belt and Landscape matters relating to land at Holborough Quarry, Kent (the Site). The Site location is illustrated on **Figure 1** and lies within the administrative areas of both Medway Council (MC) and Tonbridge and Malling Borough Council.
- 1.2 DJA is a firm of Chartered Landscape Architects and Town Planning consultants established in 1982 and has extensive experience in planning, assessment, design and implementation development proposals.
- 1.3 The firm is a Registered Practice of the Landscape Institute.

Scope

- 1.4 The purpose of this document is to review current and emerging Green Belt policy and to review the Green Belt assessments and Landscape Character Assessment 2024 produced by Medway Council (MC) as part of their Regulation 19 consultation in the area of Holborough Quarry, Kent.
- 1.5 This work follows a previous Green Belt Review, and Landscape Appraisal and GI Strategy, and produced to support representations made at the Regulation 18 stage. They can be found at **Appendix 2** and **Appendix 3** respectively. This report should be read in conjunction with both documents.
- 1.6 The previous Green Belt Review of both the MC and TMBC Green Belt Assessment concluded that:
- “The consideration of cross boundary development must be addressed to avoid an artificial parcel boundary or district boundary becoming a determining factor in revisions to the GB boundary, when the considerations of landscape are far wider reaching.*
- Despite the variation in terminology used it is clear that overall, the site makes a **moderate to low / limited contribution** to the purposes of the Green Belt.”*
- 1.7 The Landscape Appraisal and GI Strategy concluded that:
- “Significant landscape rehabilitation / connectivity opportunities arise from the development of the site and should be included in the masterplan.*
- Such planned improvement to the landscape condition and structure, as part of a wider development masterplan, would assist in meeting the guidance and aspirations of the LCAs.”*
- 1.8 These representations focus on the recently published Medway Green Belt Review (MGBR) , the methodology used, and in particular the assessment of the parcels in which the part of the Site within Medway is located.
- 1.9 It will address the following:
- Review the methodology used in the MGBR;
 - Identify any issues with the methodology;
 - Identify the positives raised by the current GB Review with regard to the Site;
 - Address the limited impact of the Site on the Green Belt;
 - A review of the cross boundary approach with TMBC; and
 - To examine if the Site is grey Belt.

Holborough Quarry

- 1.10 The site in question lies to the north west of Snodland and west of Halling and North Halling, Kent approximately 30km from central London, see **Figure 1** below.
- 1.11 The site covers an area of approximately 371ha. The part of the site within Medway, hatched in blue on **Figure 1**, is not within the KDNL. The part of the site within Tonbridge and Malling, hatched in orange on **Figure 1**, includes a small area to the west that lies within KDNL. Importantly, no built development would be located here and this area would form part of wider strategic green infrastructure corridor to ensure the integrity of the KDNL is fully maintained.
- 1.12 The area consists mainly of woodland, agricultural and arable land with extensive areas of former quarry workings. A proportion of the land benefits from a cement works mineral permission¹.
- 1.13 The developed part of the Site is separated from the Halling Conservation Area by the railway and A228 and is surrounded by other built form.
- 1.14 The small settlement of Upper Halling is located north of the site.
- 1.15 The current concept masterplan can be found at **Appendix 1**. This clearly demonstrates that there no built development is proposed with the KDNL, and that extensive green buffers are provided to the KDNL.
- 1.16 Recent updates to the Concept Masterplan are set out in the Delivery Statement.

¹ Planning application reference TM/98/785



2. GREEN BELT POLICY

National Green Belt Policy

2.1 Paragraph 137 of the Framework states that:

‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence’.

2.2 The purposes of including land within the Green Belt are set out at paragraph 143 of the Framework:

(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.

2.3 Planning Practice Guidance (Green Belt - GOV.UK² (www.gov.uk)) states that:

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

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

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

2.4 Grey belt is defined in Annex 2: Glossary of the Framework as:

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

2.5 In the consideration of grey belt, the current contribution that the developed area of the site makes to Purposes (a) to check the unrestricted sprawl of large built-up areas, (b) to prevent neighbouring towns merging into one another and (d) to preserve the setting and special character of historic towns is of relevance.

² Paragraph: 001 Reference ID: 64-013-20250225

- 2.6 Purposes (c) to assist in safeguarding the countryside from encroachment and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land are excluded.
- 2.7 If the developed part of the site is considered to be grey belt land in a sustainable location, and that the development of the site would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole, and that with the requirements of §155 being met, then the proposed development on that part of the site should not be regarded as inappropriate in the Green Belt.

3. MEDWAY COUNCIL GREEN BELT ASSESSMENT

- 3.1 The area of the Site that lies within Medway is entirely within the Metropolitan Green Belt. Other than the small area immediately south of Clements Farm, the Site is not subject to any other landscape quality designations.
- 3.2 This appraisal is made for the current Regulation 19 Consultation, including the latest Green Belt Review (MGBR), published in June 2025, for the Medway Draft Local Plan 2040. It includes references to updated PPG guidance in relation to visual openness and grey belt.
- 3.3 Reference is made to the 2018 Green Belt Review but only in regard to the methodology for the definition of parcels. Smaller more granular parcels are now proposed which is consistent with the updated guidance.
- 3.4 The MGBR undertakes assessment of 20 land parcels, all located on part of the western and south-western part of the Medway Council boundary where it overlaps with the outer extent of the Metropolitan Green Belt. All or part of Parcels 15, 16 and 20 fall within the Site.

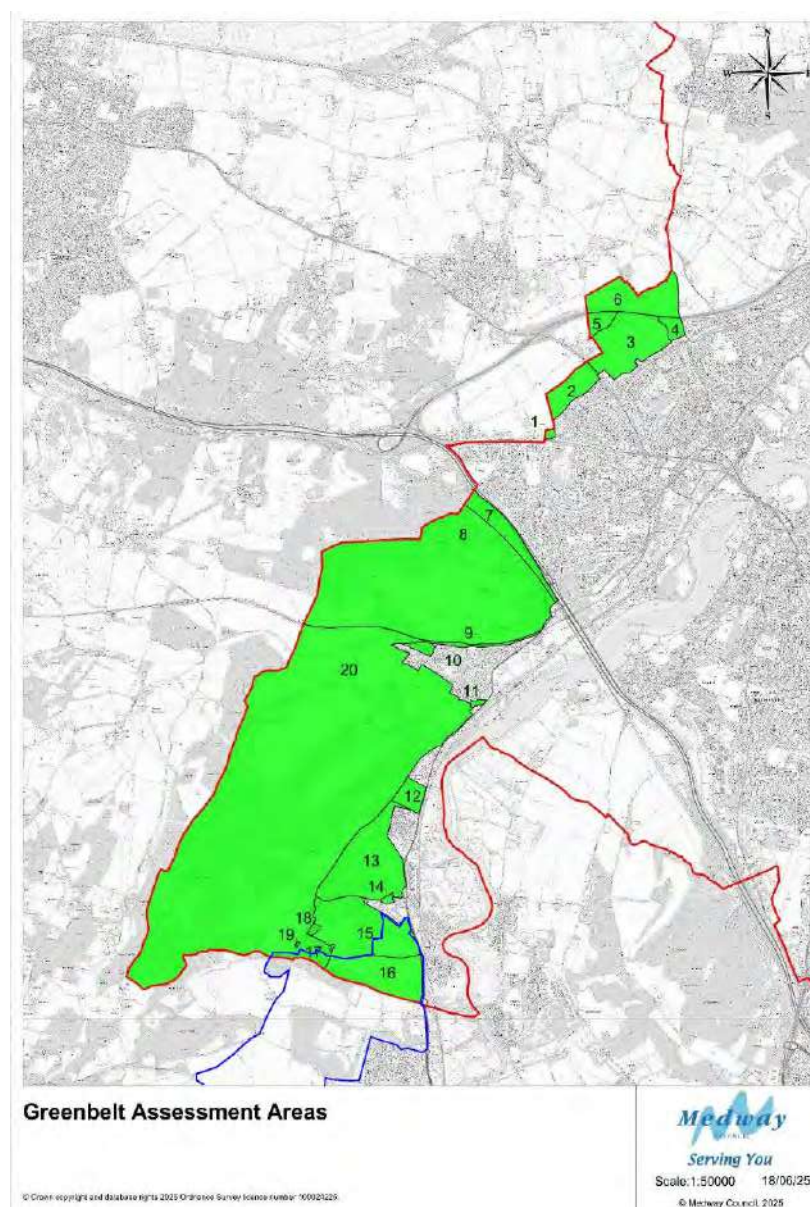


Figure 2 – Medway Green Belt Parcels (MGBR Figure 4) Site boundary shown in blue

Definition of Green Belt Boundaries

- 3.5 The MGBR rightly recognises that the defined parcels are strategic in nature and go only as far as informing site allocations, rather than stipulating them outright. The identification of permanent boundaries follows NPPF policy.
- 3.6 The land parcel sizes do however vary considerably and should not be weighed against one another on that basis. It is not clear why, for example, parcel 20 – which is considerably larger than the other parcels - cannot be reduced in size using the woodland blocks, quarries and lakes as clearly defined permanent boundaries.
- 3.7 Similarly, some of the smallest parcels should have been incorporated into wider areas, such as Parcels 14, 17, 18 and 19. No explanation is given for this approach.
- 3.8 Parcel 9 is an active railway line and embankment and should not be considered as a Parcel. This is not consistent with the methodology which defines strong boundary features such as “*railway lines, roads, motorways, major distributor roads, established property boundaries, established building lines, etc.*” at page 9 of MGBR. Even if this approach were consistent with the methodology, it is not continued westwards through Parcel 20. Parcel 7 applies the defined approach in the correct way, using the railway and the motorway as a strong boundary feature.

Green Belt Policy Criteria

- 3.9 MGBR helpfully clarifies some definitions of Green Belt policy terms which are contextually relevant:
- Purpose (a): ‘large built up areas’ are the urban extremities of Strood; Halling is described as a “*smaller village settlement*”. Sprawl is defined in Appendix A as “*The outward spread of a built up area at its periphery in an untidy, sporadic, dispersed or irregular way*”;
 - Purpose (b): ‘towns’ are listed as Gravesend and Strood. Confusingly Halling is now described as both an “*urbanised settlement*” and a village;
 - Purpose (c): “*the main consideration should be whether the rural character of the area would be threatened or overwhelmed by urbanising influences*”; and
 - Purposes (d): Strood, Rochester, Chatham, Gillingham and Rainham are listed as the only historic towns, and that their historic cores are “*far removed from the Green Belt boundary*”. It is noted on page 13 that “*the PPG refers to the visual, physical and experiential relationship to historic aspects of a historic town, therefore the historic river valley setting of Strood and Rochester could be affected and will be considered with regard to views into and out of these historic cores.*” The correct application of these criteria should only apply to areas that are visually linked to the historic core, and not the river valley as a whole.
 - Purpose (e): MGBR assigns a moderate contribution to all sites, effectively neutralising this Purpose.
 - Designated sites as described in Footnote 7 are also considered. The setting of National Landscapes or National Parks is not part of the designation of a National Landscape nor is it mentioned in Footnote 7. The setting should be a consideration but not a determining factor.

Parcel Assessment

- 3.10 MGBR provides assessment criteria at Appendix C, taken directly from the PPG. The template is useful because it breaks down the Green Belt tests using clear criteria, and the strength of contribution made to the specific Purpose.

Parcel 15

3.11 MGBR states at 3.15.1 that:

“The site is formed of undulating agricultural land and former quarries between Halling and Upper Halling. The quarries are now heavily wooded and the agricultural land is arable.”

3.12 The extent of the Site within Parcel 15 is shown below outlined in red.

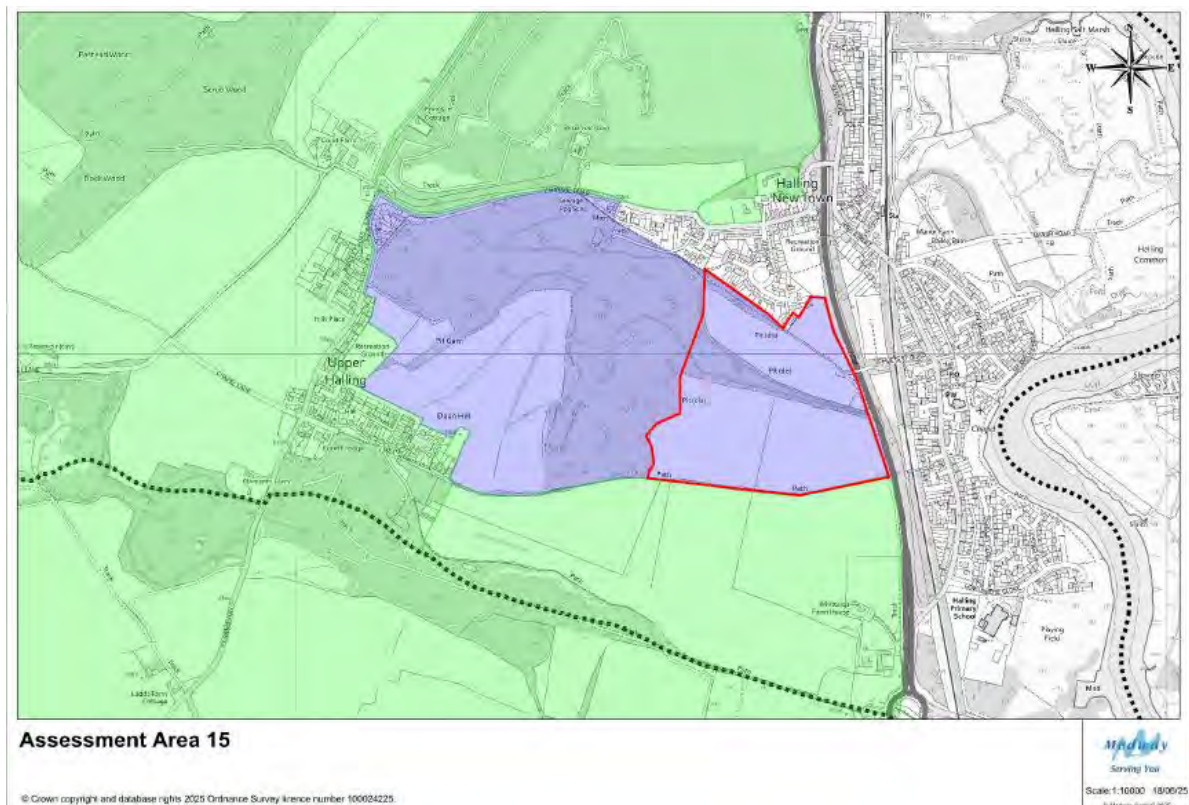


Figure 3 – Parcel 15 (MGBR Figure 20)

- 3.13 A summary of the MGBR conclusions with regard to Parcel 15 and commentary by DJA can be found below on Table 3.1.
- 3.14 MGBR concludes that Parcel 15 makes a moderate / strong contribution to the Purposes of the Green Belt, and that it does not qualify as grey belt.
- 3.15 The third column of Table 3.1 presents DJA’s assessment of the area of the Site within Parcel. This concludes that makes, at most, a moderate – weak contribution to the Purposes of the Green Belt.
- 3.16 Grey belt is discussed further at Section 4.

Table 3.1 – Parcel 15

Purpose	MGBR Assessment	DJA Assessment
(a) To check the unrestricted sprawl of large built-up areas	Strong contribution Parcel 15 has a lack of defensible boundary to the south and a significant encroachment into the countryside would result if this parcel were developed, i.e. would compromise the ability of the Green Belt to the south to function effectively. If developed, this would result in an incongruous pattern of development, much like an extended “finger” of development into the Green Belt.	No contribution Halling is a village not a large built up area.
(b) To prevent neighbouring towns from merging	Moderate contribution This parcel forms a small part of the gap between Snodland and Strood. It could be developed without the loss of visual separation between the towns. The steep embankments around the quarry would preserve visual separation.	Weak contribution Snodland in TMBC is defined as a town by TMBC. This parcel forms only a very small part of this gap, without making a contribution to visual separation between Snodland and Strood. The part of the Parcel within the Site would make an even smaller contribution
(c) Assist in safeguarding the countryside from encroachment	Strong contribution The parcel is minimally influenced by the A228 and the existing washed over residential area to the west and north east. The lack of a defensible boundary to the south however, would result in encroachment into the countryside and into parcel 16.	Moderate contribution The southern edge of the Parcel is defined by a tree belt to the west (strong) and a hedge to the east (weaker). The assumption that encroachment would continue into Parcel 16 is unsupported by the methodology and should be discounted. The eastern half of the Parcel is more influenced by the relationship with Halling. The western part of more remote and associated with Upper Halling. The part of the Site that falls with the parcel would result in a change to the rural character of the area but it would not be overwhelmed by urbanising influences.
(d) To preserve the setting and special qualities of historic towns	Moderate contribution This parcel could have an impact on the river Medway, which influences the historic setting of Rochester and Strood.	Weak / no contribution Despite the attempts to link the entire river valley to the setting of the historic towns of Rochester and Strood, the Parcel does not form part of the setting of a historic town and has no visual, physical, or

Purpose	MGBR Assessment	DJA Assessment
		experiential connection to the historic aspects of the town
(e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate contribution	Moderate contribution
Consideration of Footnote 7	Part of the site sits within the Kent Downs National Landscape designation and part sits in its setting. A SSSI also sits adjacent to the west of the parcel.	The parcel does not lie within the KDNL. Footnote 7 makes no comment about the setting of designated landscapes. The SSSI lies outside the Parcel
Overall result	Strong contribution	Moderate – weak contribution

Parcel 16

3.17 MGBR states at 3.16.1 that:

“Parcel 16 is on the edge of Upper Halling (to the west) and is defined by a PROW to the north, A229 to the east and Holder Quarry to the south. The residential properties to the west are a mixture of two storey detached/semi-detached properties.”

3.18 The Site occupies the entirety of Parcel 16.

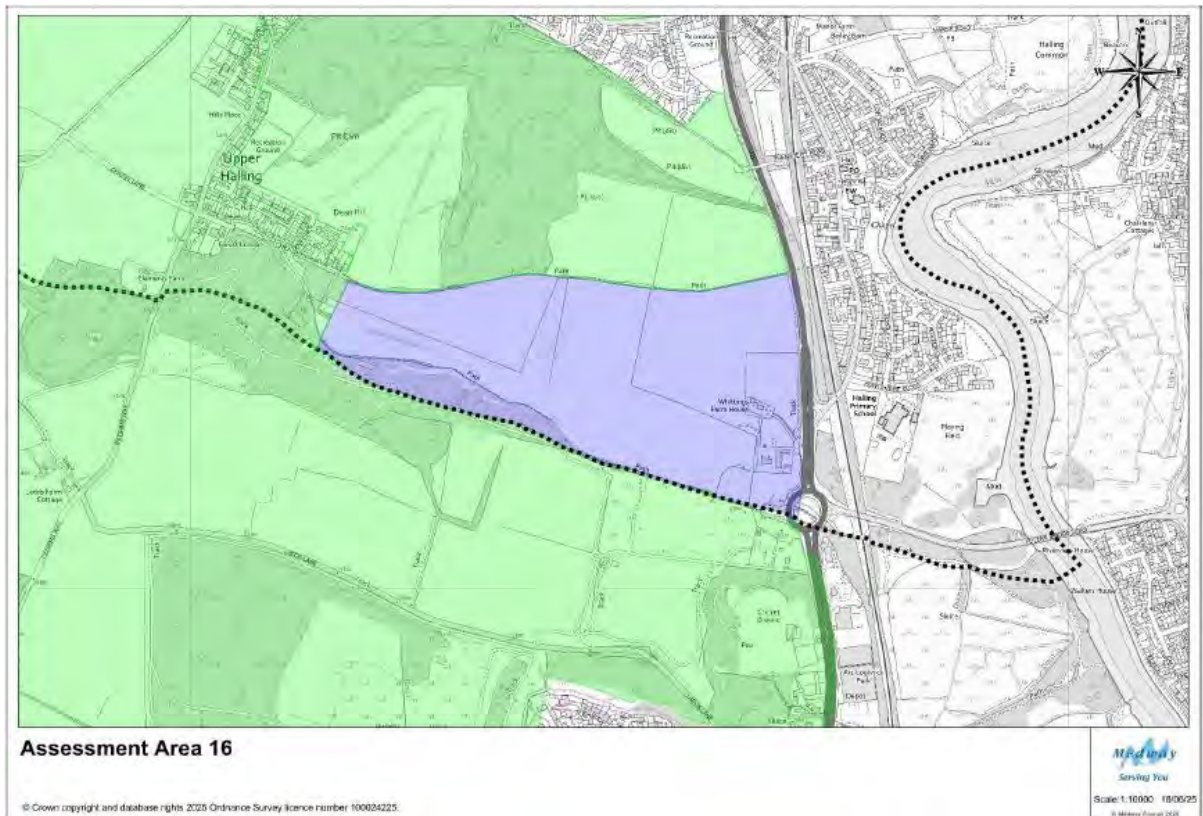


Figure 4 – Parcel 16 (MGBR Figure 21)

- 3.19 A summary of the MGBR conclusions with regard to Parcel 16 and commentary by DJA can be found below on Table 3.2.
- 3.20 MGBR concludes that Parcel 16 makes a moderate / strong contribution to the Purposes of the Green Belt, and that it does not qualify as grey belt.
- 3.21 The third column of Table 3.2 presents DJA’s assessment of the area of the Site within Parcel. This concludes that makes, at most, a moderate contribution to the Purposes of the Green Belt.
- 3.22 Grey belt is discussed further at Section 4.

Table 3.2 – Parcel 16

Purpose	MGBR Assessment	DJA Assessment
(a) To check the unrestricted sprawl of large built-up areas	Strong contribution Parcel 16 has a lack of defensible boundary to the south and a significant encroachment into the countryside would result if this parcel were developed, i.e. the northern and western boundaries are weak and would compromise the ability of the Green Belt to the west and north to function effectively. If developed, this would result in an incongruous pattern of development, much like an extended “finger” of development into the Green Belt.	No contribution The southern boundary is strongly defined by a PROW following an old rail line set within a cutting that has tree belts, hedgerows and security fencing along it. Halling / Upper Halling are villages not a large built up area.
(b) To prevent neighbouring towns from merging	Moderate contribution This parcel forms a small part of the gap between Snodland and Strood. It could be developed without the loss of visual separation between the towns. A further quarry site to the north provides a landscape features that would preserve visual separation.	Weak contribution Snodland in TMBC is defined as a town by TMBC. This parcel forms only a very small part of this gap, without making a contribution to visual separation between Snodland and Strood.
(c) Assist in safeguarding the countryside from encroachment	Strong contribution The parcel is minimally influenced by the A228 and the existing washed over residential area to the west. The lack of a defensible boundary to the north and west however, would result in encroachment into the countryside and into parcel 20.	Moderate contribution The western edge of the Parcel is defined by an area of emerging woodland (strong) and woodland / tree line to the south (strong). The assumption that encroachment would continue into Parcel 20 is unsupported by the methodology and should be discounted. The eastern half of the Parcel is more influenced by the relationship with Halling. The western part of more remote and associated with Upper Halling.
(d) To preserve the setting and special qualities of historic towns	Moderate contribution This parcel could have an impact on the river Medway, which influences the historic setting of Rochester and Strood.	Weak / no contribution Despite the attempts to link the entire river valley to the setting of the historic towns of Rochester and Strood, the Parcel does not form part of the setting of a historic town and has no visual, physical, or experiential connection to the historic aspects of the town

Purpose	MGBR Assessment	DJA Assessment
(e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate contribution	Moderate contribution
Consideration of Footnote 7	Part of the site sits within the Kent Downs National Landscape designation and part sits in its setting. A SSSI also sits adjacent to the west of the parcel.	The parcel does not lie within the KDNL. Footnote 7 makes no comment about the setting of designated landscapes. The SSSI lies outside the Parcel
Overall result	Strong contribution	Moderate contribution

Parcel 20**3.23 MGBR states at 3.20.1 that:**

“This is the largest of all land parcels as it performs the function of a strategic gap as well. The eastern edges of this parcel bound numerous other parcels and Pilgrims Way, 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.

This is a 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 Cuxton and Halling.”

- 3.24 The vast majority of the Parcel lies within the KDNL, the boundary follows Pilgrims Way / Pilgrims Road. It is surprising that this Parcel was chosen for assessment given its protected status as a National Landscape. The only areas that do not fall within the KDNL is the land that falls within the Site and the washed over village of Upper Halling.
- 3.25 The extent of the Site within Parcel 20, south of Upper Halling, is shown below outlined in red. This area falls outside the KDNL and should have been included as a separate parcel.
- 3.26 A summary of the MGBR conclusions with regard to Parcel 20 and commentary by DJA can be found below on Table 3.3.
- 3.27 MGBR concludes that Parcel 20 makes a strong contribution to the Purposes of the Green Belt, and that it does not qualify as grey belt.
- 3.28 The third column of Table 3.3 presents DJA’s assessment of the area of the Site within Parcel. This concludes that makes, at most, a weak contribution to the Purposes of the Green Belt.
- 3.29 Grey belt is discussed further at Section 4.

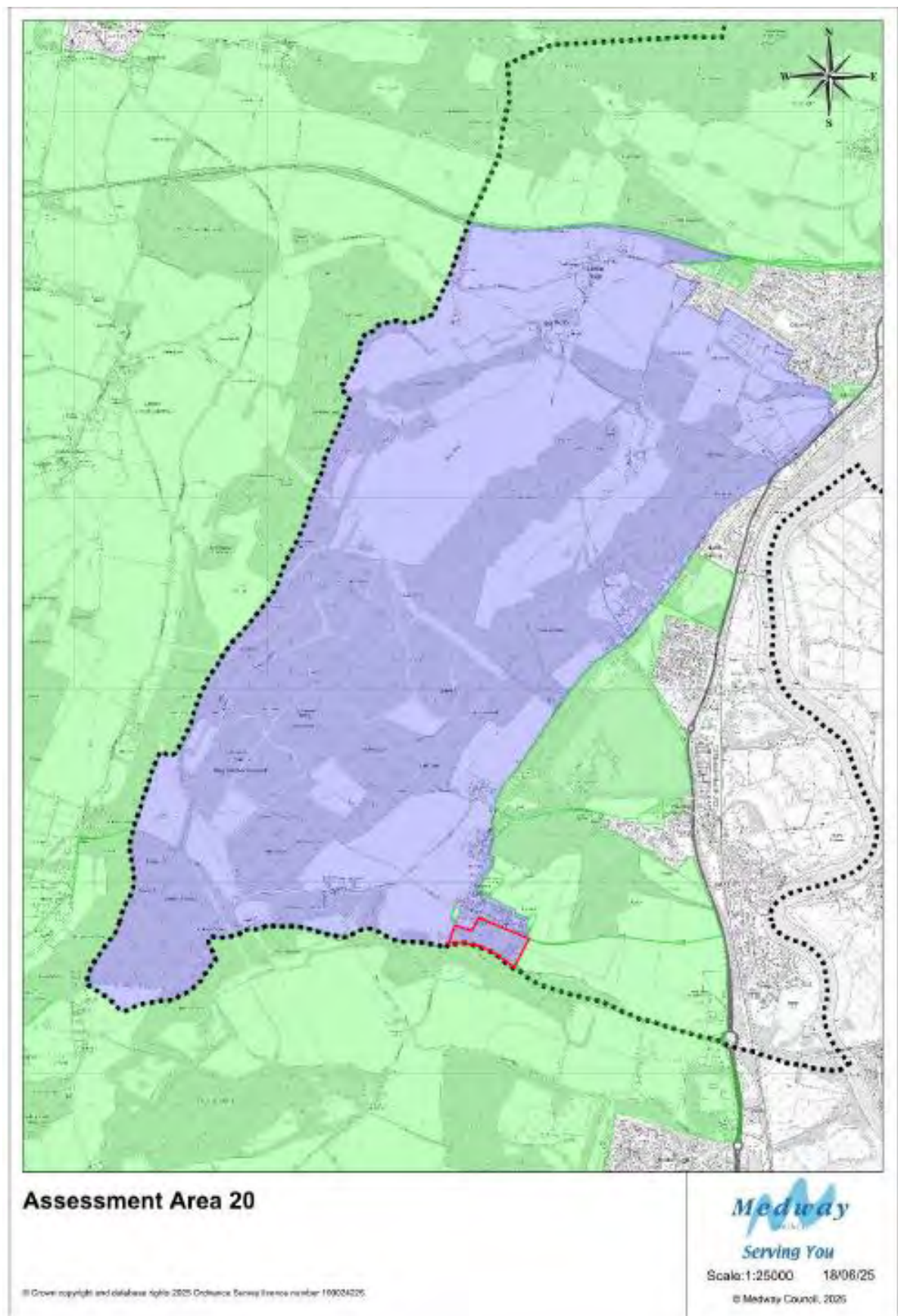


Figure 5 – Parcel 20 (MGBR Figure 25)

Table 3.3 – Parcel 20

Purpose	MGBR Assessment	DJA Assessment
(a) To check the unrestricted sprawl of large built-up areas	<p>Strong contribution</p> <p>Whilst not totally free of development, the existing built form is limited and is rural in nature, i.e. Upper Bush and Upper Halling. The Green Belt is overlapped significantly by the Kent Downs National Landscape designation making this area very sensitive to development. The western boundary is less defined and therefore parcel 20 lacks a defensible boundary, which if development came forward could have significant impacts and encroach upon Green Belt land in Gravesham BC. The site is near to the built up area of Snodland and if developed alongside parcels 8 and 7 would lead to significant sprawl and merging of Snodland and Strood. If parcel 20 were to be developed, it would result in an incongruous pattern of development into the Green Belt in Gravesham and Tonbridge & Malling. The nature of the area and its sensitivity remains a key consideration.</p>	<p>No contribution</p> <p>Halling is a village not a large built up area. The area of the Site within Parcel 20 makes no contribution to Purpose (a)</p>
(b) To prevent neighbouring towns from merging	<p>Moderate contribution</p> <p>Parcel 20 on its own forms a significant part of gap between Snodland and Strood. This parcel therefore performs a strong role in ensuring neighbouring towns are separated physically and visually.</p>	<p>No contribution</p> <p>Snodland in TMBC is defined as a town by TMBC. This area of the Site within this parcel forms a negligible part of this gap, and makes no contribution to visual separation between Snodland and Strood.</p>
(c) Assist in safeguarding the countryside from encroachment	<p>Strong</p> <p>Some common boundaries with parcels 15, and 16 don't function as defensible boundaries. Additionally, the western boundary adjoining Gravesham BC and the southern boundary joining Tonbridge and Maling BC are also weak. Development of this parcel of land would lead to encroachment of the countryside and Green Belt in neighbouring authorities from performing their functions.</p>	<p>Moderate contribution</p> <p>The area within the Site is a former quarry and unlikely to be the subject of any built development. The boundaries are well defined by former quarry faces. The assumption that encroachment would continue into neighbouring authorities is unsupported by the methodology and should be discounted. The part of the Site that falls within the parcel would result in a change to the rural character</p>

Purpose	MGBR Assessment	DJA Assessment
		of the area but it would not be overwhelmed by urbanising influences.
(d) To preserve the setting and special qualities of historic towns	Moderate contribution This parcel could have an impact on the river Medway, which influences the historic setting of Rochester and Strood.	No contribution Despite the attempts to link the entire river valley to the setting of the historic towns of Rochester and Strood, the area of the Site within the Parcel does not form part of the setting of a historic town and has no visual, physical, or experiential connection to the historic aspects of the town
(e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate contribution	Moderate contribution
Consideration of Footnote 7	Part of the site sits within the Kent Downs National Landscape designation and part sits in its setting. A SSSI also sits adjacent to the west of the parcel.	The area of the Site within the parcel does not lie within the KDNL. Footnote 7 makes no comment about the setting of designated landscapes. The SSSI lies outside the Parcel
Overall result	Strong contribution	Weak contribution

4. CROSS BOUNDARY CONSIDERATIONS

4.1 Paragraph 1.2 states the key objectives of MGBR:

- *Assess 2018 Green Belt Review to determine if fit for purpose against revised NPPF and PPG*
- *Undertake review of Green Belt land to identify, if any, Grey Belt land*
- *Assess implications of Medway Green Belt land linked to neighbouring authority Green Belt identified for release*

4.2 It is acknowledged at 2.3 Duty to Co-operate that *“Tonbridge and Malling BC are preparing toward their Regulation 18 and progressing evidence gathering and commissioning. A green Belt review is part of this work and will include testing of the proposal site.”*

4.3 In light of this it is surprising that there is little evidence that any consideration has been given to the relationship between Medway and TMBC, as required under bullet 3 above.

4.4 Great emphasis has been placed on the relationship between the urban area of Medway and Gravesend to the west. Despite the distance between the urban area of Medway and Snodland being very similar, this relationship is barely mentioned. Where it is addressed, it is done so incorrectly.

4.5 At 2.7.1 of MGBR it states that *“Snodland (within Tonbridge & Malling borough) lies immediately to the south of the Medway urban area”*; this is incorrect. Snodland is over 4km from the closest part of the urban area of Medway. The intervening villages of Cuxton and Halling are not part of the urban area.

4.6 GBS goes on to say *“Green Belt (alongside other designations) has played a useful historic role in managing expansion of these villages and reducing the risk of incremental coalescence between Strood and Snodland. With the new guidance, these designations still play this role albeit now being focussed on preventing the coalescence between Strood and Snodland, i.e. villages no longer fall within the guidance for this criteria.”*

4.7 This makes little sense and is contradictory. The settlements are villages, and it is correct that they should form no part of the consideration of coalescence of Strood and Snodland under Purpose (b). This demonstrates the confused consideration of the Green Belt within TMBC.

5. GREY BELT

5.1 Grey belt is defined in Annex 2: Glossary of the Framework (December 2024) as:

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

5.2 In the consideration of grey belt, the current contribution that the developed area of the site makes to Purposes (a) to check the unrestricted sprawl of large built-up areas, (b) to prevent neighbouring towns merging into one another and (d) to preserve the setting and special character of historic towns is of relevance.

5.3 Purposes (c) to assist in safeguarding the countryside from encroachment and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land are excluded.

5.4 MGBR concludes that Parcels 15, 16 and 20 are not grey belt. This is not supported.

5.5 With regard to Purpose (a) MGBR does not consider Halling to be a large built-up area.

5.6 It is clear from the DJA assessment above that the areas of the Site that fall within Parcels 15, 16 and 20 are related to the villages of Halling and Upper Halling. The PPG makes it clear that villages are not considered to be large built up areas. On that basis the areas of the Site within the Parcels do not make a strong contribution to Purpose (a).

5.7 With regard to Purpose (b) to prevent neighbouring towns merging into one another, MGBR considers Strood and Gravesend to be classified as towns.

5.8 It is clear from the DJA assessment above that the areas of the Site that fall within Parcels 15, 16 and 20 are related to the villages of Halling and Upper Halling. The PPG makes it clear that villages are not considered to be large built up areas. On that basis the areas of the Site within the Parcels make no contribution to Purpose (b).

5.9 With regard to Purpose (d) to preserve the setting and special qualities of historic towns, MGBR accepts that the *“historic cores of the towns of Rochester and Strood are far removed from the Green Belt boundary”*. Despite the attempts to link the entire river valley to the setting of the historic towns of Rochester and Strood, the area of the Site within the Parcels do not form part of the setting of a historic town and have no visual, physical, or experiential connection to the historic aspects of the town. On that basis the areas of the Site within the Parcels make no contribution to Purpose (d).

5.10 It can therefore be concluded that the areas of the Site within the Parcels make no contribution to Purposes (a), (b) or (d).

5.11 On this basis the Site is considered to be grey belt as defined by the Framework.

5.12 With respect to paragraph 155a of the Framework, given the reasonably compact nature of the developed parts of the Site within MC, that they form a logical extension to the settlement of Halling and its relatively limited functional and visual connectivity with the wider landscape, the delivery of the developed part of the site would have no effect on the wider Green Belt locally. It would not *“fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan”*, namely the MC administrative area.

- 5.13 Paragraph 156c requires *“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.”*
- 5.14 The open space that would accompany the development of the Site would:
- Provide an area of high quality well maintained and managed open space for the benefit of all residents, both new and existing;
 - Be provided free of charge and with limited time restrictions;
 - Deliver access to the open space would be via foot, cycle, and nearby road connections which include public transport;
 - Make a significant contribution to local biodiversity, with areas set aside for habitat areas, tree planting and wildflower grassland; and
 - Be delivered via suitably worded conditions and legal agreements.
- 5.15 Any proposed scheme for the Site would need to satisfy the Golden Rules as defined at 156 of the Framework.
- 5.16 Hallam Land are committed to achieving this and as such, , it would be wholly consistent with paragraph 159 of that Framework in that the scheme would *“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”*.

6. LANDSCAPE CHARACTER ASSESSMENT

6.1 MC published a landscape character assessment in 2024³.

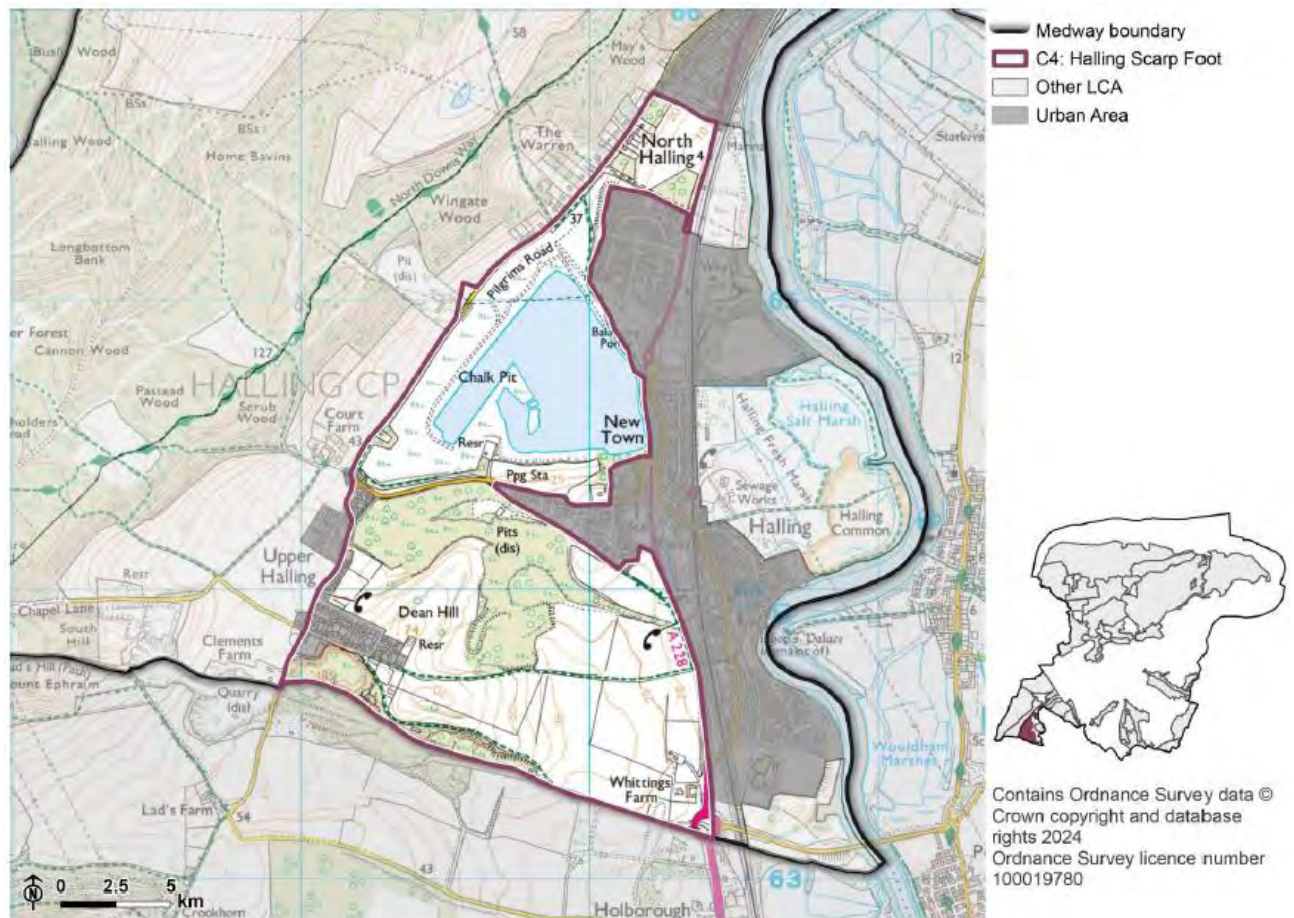


Figure 6 – LCA C4 (MLCA Figure 7.16)

6.2 The Site lies within LCA C4 Halling Scarp Foot LCA.

6.3 It is described on page 239 as:

“The Halling Scarp Foot LCA is located to the west of Halling. It is defined by Rochester Road/Formby Road (A228) to the east, which marks the transition to the lower lying valley bottom of the River Medway (LCA B2: Halling and Holborough Marshes); by Pilgrims Road to the west, which marks the transition to a steeply rising scarp (LCA C3: Halling Scarp West); and to the south by the administrative boundary with neighbouring Tonbridge and Malling Borough.

This is a rolling scarp foot landscape strongly influenced by former chalk quarrying. It comprises arable farmland, disused quarries (largely colonised by scrub and pioneer woodland) and other remnant industrial features. It lies immediately adjacent to the Kent Downs Kent Downs National Landscape (formerly an AONB) along its western boundary.”

6.4 The key characteristics are described as:

³ Medway Landscape Character Assessment Medway Council (June 2024) Medway Council / LUC

- *“An undulating and sloping scarp foot landscape, falling from the scarp edge in the west down to the edge of the River Medway valley floor in the east; natural landform disturbed in places by former chalk quarrying.*
- *Comprises arable farmland interspersed with settlement and remnants of former chalk quarrying.*
- *Well-wooded to the south, with a large area of deciduous woodland and scrub covering an area former chalk pits around Dean Hill; more open elsewhere with only occasional smaller pockets of woodland.*
- *Retains its historic settlement pattern of scattered farmsteads and small hamlets to the south, with Upper Halling retaining its identity as a separate settlement; to the north Halling has increased notably in size, including recent development at St Andrews Lake.*
- *Features several roads and a network of PRoW, with a particular concentration to the south; these routes run either perpendicular to or parallel with the slope of the land, with the former connecting the scarp top with the river valley.*
- *Pilgrims Road forms part of the ‘Pilgrims Way’.*
- *St Andrews Lake, a flooded former chalk quarry, is a notable feature in the landscape with a distinctive turquoise colour; it is now used recreationally for water sports, fishing, diving and open water swimming.*
- *Fragmented character in places due to remnants of former chalk quarrying, the presence of urbanising development to the east and north, and the busy A228; other detracting elements visible within the surrounding area include pylons and cement works (Cemex site) on the valley floor to the east.*
- *There are some views east across the Medway Valley from the upper slopes and from more open arable areas to the south.*
- *Sense of enclosure around the former chalk pits to the south, due to topography and tree cover.”*

6.5 Key Sensitivities and Values are defined as:

- *Predominantly open land lying within the Green Belt.*
- *Ecologically important areas of Priority Habitat ‘deciduous woodland’.*
- *Importance of woodland in providing enclosure and connecting habitats.*
- *Recreational value of PRoW, the ‘Pilgrims Way’ and St Andrews Lake.*
- *Forms part of an open buffer between Upper Halling and Halling helping to maintain their separate settlement identities.*
- *Sloping scarp foot, contrasting with the adjacent steeper sloping scarp to the west and flat low-lying valley bottom to the east.”*

6.6 Development Management guidelines are as follows:

- *“Any large scale or visually intrusive development would be detrimental within the more visually open parts of the landscape and impact on views, including the visual setting of the adjacent Western and Eastern Scarp Areas of the Kent Downs National Landscape.*

- *Maintain the sense of openness between Upper Halling and Halling by resisting proposals for new development; conserve the individual identity of Upper Halling, by resisting further development along Pilgrims Road.*
- *Avoid additional visually intrusive development along the valley bottom to the east; consider opportunities for the removal of intrusive elements, such as pylons and the undergrounding power lines.*
- *If development is proposed look to minimise its impact through careful design, in terms of siting, form, scale, massing, materials and the use of locally characteristic planting.*
- *Seek to reduce lighting impacts and avoid any further reduction in tranquillity to the north and east; minimise the use of lighting, in particular blue light emissions, and use shielding and sensors effectively to direct lighting downwards."*

6.7 The Assessment comes to no conclusion about the sensitivity of LCA C4.

6.8 The development management guidelines do not preclude development, only that any such development must be carefully sited and appropriate to its setting.

6.9 The setting of the KDNL must be taken into account. The PPG requires that:

"Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

Paragraph: 042 Reference ID: 8-042-20190721"

6.10 Ongoing change is recognised in the Valley of Visions Landscape Partnership Scheme document "The Medway Gap".

"The river was more than just a means of transportation in the heyday of the valley's industry. The sheer power of fast-flowing streams into the river meant paper making had been thriving on its banks since before the 17th century. Many of these small paper mills closed in the middle of the 19th century and the industry, like others in the area, became dominated by large-scale producers. In fact two very modern paper mills still exist in Snodland and New Hythe today.

The existing pockets of industry in the Medway Gap, while vital to its economy, are far less intrusive than in the past. For the first time in over a hundred years, cement isn't made in this valley. It's possible however that the coming years will see one of the largest cement works in Europe set up camp in the chalk fields of the Medway Gap once more."

6.11 The guidance from both the Kent and Medway LCAs would support a comprehensive landscape scale improvement to the area, including a planned coherent patterns of land use including future development.

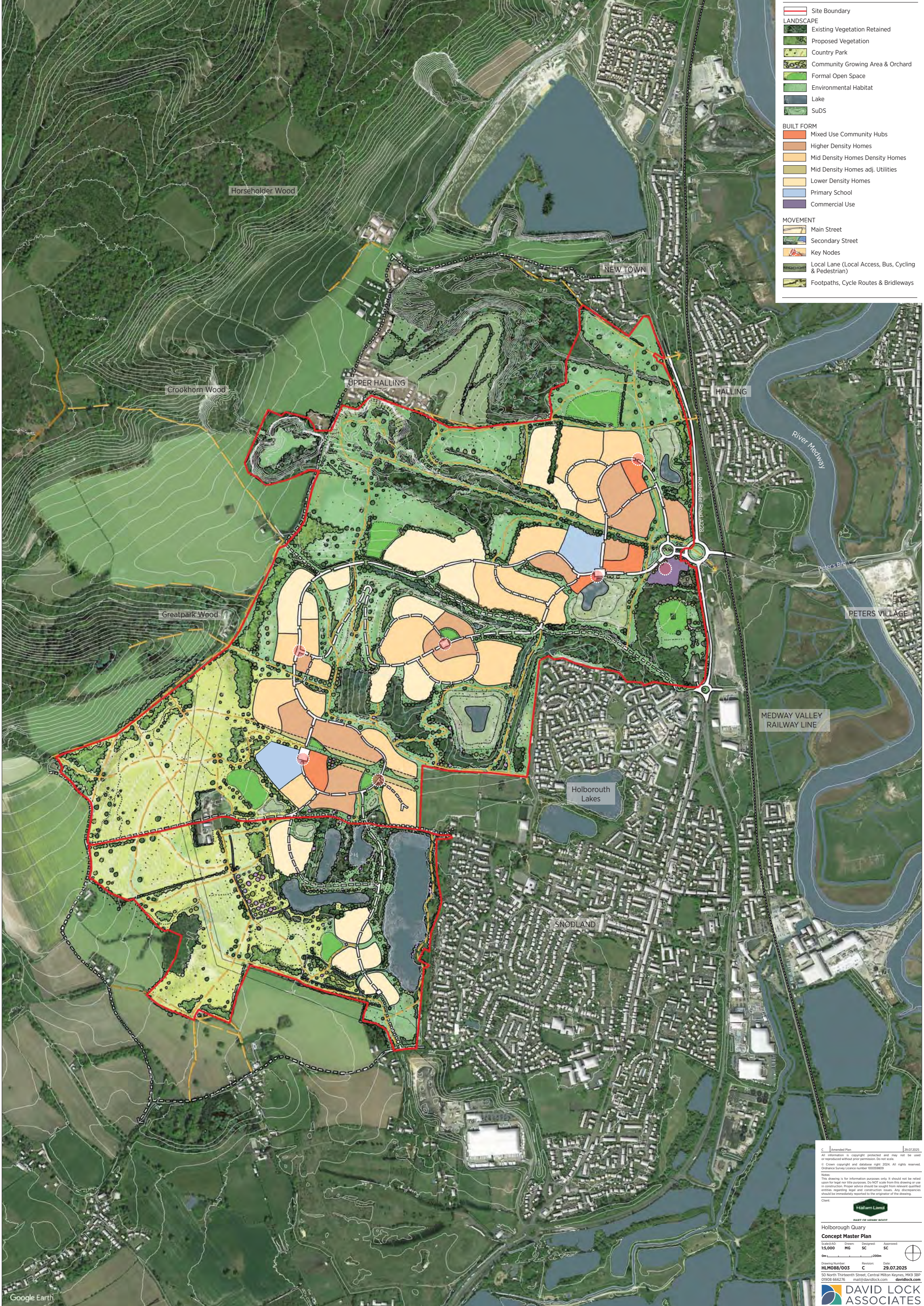
6.12 An opportunity exists to address some of the damage done to the landscape over the last few hundred years by industrial development. This would be entirely consistent with the aims of the LCA and the Valley of Visions Landscape Partnership Scheme.

7. SUMMARY

- 7.1 David Jarvis Associates Limited (DJA) is instructed by Hallam Land to provide advice on Green Belt relating to land at Holborough Quarry, Kent (the Site). The Site lies within the administrative areas of both Medway Council and Tonbridge and Malling Borough Council.
- 7.2 The purpose of this document is to review current and emerging Green Belt policy and to review the Green Belt assessments and Landscape Character Assessment 2024 produced by Medway Council (MC) as part of their Regulation 19 consultation in the area of Holborough Quarry, Kent.
- 7.3 DJA's assessment concludes that those areas of the Site that fall within MC would make, at most, a moderate contribution to the Green Belt.
- 7.4 It is also concluded that the areas of the Site within the Parcels make no contribution to Purposes (a), (b) or (d).
- 7.5 On this basis the Site is considered to be grey belt as defined by the Framework.
- 7.6 Great emphasis has been placed on the relationship between the urban area of Medway and Gravesend to the west. Despite the distance between the urban area of Medway and Snodland being very similar, this relationship is barely mentioned. Where it is addressed, it is done so incorrectly.
- 7.7 The release of the Site from the Green Belt needs to be considered in the context of the cross-boundary opportunity and the Concept Masterplan.
- 7.8 The guidance from both the Kent and Medway LCAs would support a comprehensive landscape scale improvement to the area, including a planned coherent pattern of land use including future development at Holborough Quarry.
- 7.9 An opportunity exists to address some of the damage done to the landscape over the last few hundred years by industrial development.
- 7.10 The proposed GI strategy found at Appendix 3 depicts the overarching approach for the site, with the aim of providing a landscape structure for development to sit within. Significant landscape rehabilitation / connectivity opportunities arise from the development of the site and are included in the masterplan.
- 7.11 This strategy would deliver the landscape mitigation discussed at 6.6 and could include such measures as:
- providing significant areas of parkland and active green spaces forming parts of an integrated green buffer around the edge of the development;
 - keeping development away from the KDNL boundary;
 - providing areas of planting at the most sensitive edges to screen development;
 - provide planting within the development to help break up suburban grain;
 - and providing lower density development securing a suitable transition to the open parkland and creating visual permeability into the new neighbourhoods.
- 7.12 Such planned improvement to the landscape condition and structure, as part of a wider development masterplan, would be entirely consistent with the aims of the LCA and the Valley of Visions Landscape Partnership Scheme.

Appendix 1

Concept Masterplan



- Site Boundary
- LANDSCAPE
 - Existing Vegetation Retained
 - Proposed Vegetation
 - Country Park
 - Community Growing Area & Orchard
 - Formal Open Space
 - Environmental Habitat
 - Lake
 - SuDS
- BUILT FORM
 - Mixed Use Community Hubs
 - Higher Density Homes
 - Mid Density Homes Density Homes
 - Mid Density Homes adj. Utilities
 - Lower Density Homes
 - Primary School
 - Commercial Use
- MOVEMENT
 - Main Street
 - Secondary Street
 - Key Nodes
 - Local Lane (Local Access, Bus, Cycling & Pedestrian)
 - Footpaths, Cycle Routes & Bridleways

C: Amended Plan 29.07.2025

All information is copyright protected and may not be used or reproduced without prior permission. Do not scale.

© Crown copyright and database right 2024. All rights reserved. Ordnance Survey Licence number 100058690

Notes: This drawing is for information purposes only. It should not be relied upon for legal or title purposes. Do not scale from this drawing or use in construction. Proper advice should be sought from relevant qualified entities regarding legal and construction issues. Any discrepancies should be immediately reported to the originator of the drawing.

Client: **Holborn Quarry**

Concept Master Plan

Scale/AG:	Drawn:	Designed:	Approved:
1:5,000	MG	SC	SC

0m 100m 200m

Revision: **C** Date: **29.07.2025**

Drawn: **HL088/003** Design: **HL088/003** Date: **29.07.2025**

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP
01908 666276 mail@davidlock.com davidlock.com

DAVID LOCK ASSOCIATES

Appendix 2

Holborough Quarry Green Belt Review (DJA September 2024)

HALLAM LAND

HOLBOROUGH QUARRY

GREEN BELT REVIEW

ISSUE: Friday, 06 September 2024

CLIENT Hallam Land

PROJECT Holborough Quarry

REPORT TITLE Green Belt Review

DJA Reference: 2874-4-1-TD-0001-S5-P3 Holborough Quarry Green Belt Review 060924

Report Number: TD 0001

Revision: P3

Issue Date: Friday, 06 September 2024

REPORT REVISIONS

Revision	Date	Description	Prepared	Approved
P1	30/08/2024	Draft	PG	PG
P2	04/09/2024	Second draft	PG	PG
P3	06/09/2024	Issue	PG	PG

CONTENTS

SUMMARY	4
1. INTRODUCTION	5
2. GREEN BELT POLICY	7
3. MEDWAY COUNCIL GREEN BELT ASSESSMENT	10
4. TONBRIDGE AND MALLING BOROUGH COUNCIL GREEN BELT ASSESSMENT.....	20
5. SUMMARY.....	30

FIGURES:

LV-0001.	Site Location
LV-0002.	Site Location (Medway)
LV-0003.	Green Belt Land Parcels (Medway)
LV-0004.	Topographical Relief (Medway)
LV-0005.	Land Uses (Medway)
LV-0006.	Designations (Medway)
LV-0007.	Site Location (TMBC)
LV-0008.	Green Belt Land Parcels (TMBC)
LV-0009.	Topographical Relief (TMBC)
LV-00010.	Land Uses (TMBC)
LV-00011.	Designations (TMBC)

Appendices:

1. TMBC Green Belt Study 2016 – Snodland Assessment (Extract)

SUMMARY

The purpose of this document is to review current and emerging Green Belt policy and to review the Green Belt assessments produced by Medway Council (MC) and Tonbridge and Malling Borough Council (TMBC) in the area of Holborough Quarry, Kent. This review is provided to assist both Councils in undertaking their respective Green Belt reviews, ensuring a consistency in approach in how Holborough Quarry is assessed.

The areas of the site that fall within each LPA area have been assessed against the respective methodologies used.

The consideration of cross boundary development must be addressed to avoid an artificial parcel boundary or district boundary becoming a determining factor in revisions to the GB boundary, when the considerations of landscape are far wider reaching. Please can we look at how we are responding to this.

A summary table of the results can be found below.

Despite the variation in terminology used it is clear that overall, the site makes a **moderate to low / limited contribution** to the purposes of the Green Belt.

Summary

Purpose	Performance of the areas of the site within Medway	Performance of the areas of the site within TMBC
Purpose (a) To check the unrestricted sprawl of large built-up areas	Moderate	Performs Moderately
Purpose (b) To prevent neighbouring towns from merging into one another	Moderate - Low	Performs Moderately
Purpose (c) To assist in safeguarding the countryside from encroachment	Moderate	Performs Moderately
Purpose (d) To preserve the setting and special character of historic towns	Not considered in GBR	Limited or no contribution
Purpose (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not considered in GBR	Not considered in GBR

1. INTRODUCTION

- 1.1 David Jarvis Associates Limited (DJA) is instructed by Hallam Land (in partnership with Tarmac and Aggregate Industries) to provide advice on Green Belt matters relating to land at Holborough Quarry, Kent (the Site). The Site location is illustrated on **Figure 1** and lies within the administrative areas of both Medway Council and Tonbridge and Malling Borough Council.
- 1.2 DJA is a firm of Chartered Landscape Architects and Town Planning consultants established in 1982 and has extensive experience in planning, assessment, design and implementation development proposals.
- 1.3 The firm is a Registered Practice of the Landscape Institute.

Scope

- 1.4 The purpose of this document is to review current and emerging Green Belt policy and to review the Green Belt assessments produced by Medway Council (MC) and Tonbridge and Malling Borough Council (TMBC) in the area of Holborough Quarry, Kent. Whilst the Councils should undertake their own Green Belt Reviews, the methodologies and approaches to assessment should be aligned and cognicent of each other to ensure a robust and consistent approach when looking at land that extends across both authorities, as at Holborough Quarry.
- 1.5 Hallam Land's Green Belt Review is provided to assist the Councils in this undertaking by providing comments on the methodologies and assessments relevant to the land at Holborough Quarry in their respective Green Belt reviews. It also provides the following assessments to demonstrate how the parts of Holborough Quarry within the respective authority areas perform:
- The part of Site within Medway's contribution to the purposes of the Green Belt using the methodology in MC's 2018 Green Belt Review
 - The part of Site within TMBC's contribution to the purposes of the Green Belt using the methodology in TMBC's 2016 Green Belt Review
- 1.6 We have reviewed the LPA methodologies and have used the methodology relevant to each LPA in consideration of the effect on Green Belt.
- 1.7 It should be noted that the areas of the site are geographically smaller than the parcels assessed by the relevant LPA.
- 1.8 Hallam Land's Green Belt Review should also inform MC's preparation of their Draft Local Plan Regulation 19 and TMBC's preparation of their Draft Local Plan Regulation 18.

Holborough Quarry

- 1.9 The site in question lies to the north west of Snodland and west of Halling and North Halling, Kent approximately 30km from central London.
- 1.10 The site covers an area of approximately 371ha. The part of the site within Medway is not within the KDNL, but the part of the site within Tonbridge and Malling does include a small area at the west that lies within KDNL. Importantly, no built development would be located here and this area would form part of wider strategic green infrastructure corridor to ensure the integrity of the KDNL is fully maintained.

- 1.11 The area consists mainly of woodland, agricultural and arable land with extensive areas of former quarry workings. A proportion of the land benefits from a cement works mineral permission¹.
- 1.12 The small settlement of Upper Halling is located north of the site, with some dwellings located sparsely within the site.

¹ Planning application reference TM/98/785

2. GREEN BELT POLICY

National Green Belt Policy

2.1 Paragraph 137 of the National Planning Policy Framework² ('the Framework') states that:

'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

2.2 The purposes of including land within the Green Belt are set out at paragraph 143 of the Framework:

(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.

2.3 Planning Practice Guidance (Green Belt - GOV.UK³ (www.gov.uk) states that:

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

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

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

Consultation draft of NPPF

2.4 The new Government released a consultation draft of the NPPF in July 2024.

2.5 Paragraph 144 reads:

"Where it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations."

2.6 Previously developed land is defined in Annex 2 as, with my underlining:

"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and

² 20 December 2023

³ Paragraph: 001 Reference ID: 64-001-20190722

any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

- 2.7 Much of the site was developed for mineral extraction, with extensive areas subject to quarrying, although provision for restoration is not provided for some areas of the site through the development management processes.

- 2.8 “Grey belt land” is defined in Annex 2 as:

“land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).”

- 2.9 Paragraph 152 reads:

“In addition to the above, housing, commercial and other development in the Green Belt should not be regarded as inappropriate where:

a. The development would utilise grey belt land in sustainable locations, the contributions set out in paragraph 155 below are provided, and the development would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole; and

b. The local planning authority cannot demonstrate a five year supply of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 76) or where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years; or there is a demonstrable need for land to be released for development of local, regional or national importance.

c. Development is able to meet the planning policy requirements set out in paragraph 155.”

- 2.10 If the above criteria are met, a proposed development should not be regarded as inappropriate subject to the provisions of paragraph 155 being met.

- 2.11 Paragraph 155 reads:

“Where major development takes place on land which has been released from the Green Belt through plan preparation or review, or on sites in the Green Belt permitted through development management, the following contributions should be made:

a. In the case of schemes involving the provision of housing, at least 50% affordable housing [with an appropriate proportion being Social Rent], subject to viability;

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. Where residential development is involved, the objective should be for new residents to 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.”

- 2.12 If the developed part of the site is considered to be grey belt land in a sustainable location, and that the development of the site would not fundamentally undermine the function of the Green Belt

across the area of the plan as a whole, and that with the requirements of §155 being met, then the proposed development on that part of the site should not be regarded as inappropriate in the Green Belt.

3. MEDWAY COUNCIL GREEN BELT ASSESSMENT

- 3.1 The Site lies entirely within the Metropolitan Green Belt but is not subject to any other landscape quality designations. This appraisal is made for the current Regulation 18 Consultation, including the latest Green Belt Review (MGBR), published in December 2018, for the Medway Draft Local Plan 2040 (the LPA). It is not clear if the current consultation draft local plan has had any regard to the 2018 GBR.

Scope

- 3.2 These representations focus on the last published Medway Green Belt Review (MGBR), published in December 2018, and in particular the assessment of the parcel in which the part of the Site within Medway is located, this being land parcel no. 5. It will address the following:

- Review the methodology used in the MGBR;
- Identify any issues with the methodology;
- Identify the positives raised by the current GB Review with regard to the Site;
- Address the limited impact of the Site on the Green Belt.

- 3.3 These representations should be read in conjunction with the following figures included in this report:

Figure 2: Site Location

Figure 3: Green Belt Land Parcels

Figure 4: Topographical Relief

Figure 5: Land Uses

Figure 6: Designations

Consideration of Medway Green Belt Review

- 3.4 The MGBR was published in December 2018, to inform the then emerging Local Plan, and is nearing five years old. Consequently, it does not include references to updated PPG guidance published in 2019, in relation to visual openness, which now forms part of Green Belt considerations.
- 3.5 The MGBR undertakes assessment of five land parcels, all located on part of the western and south-western part of the Medway Council boundary where it overlaps with the outer extent of the Metropolitan Green Belt. Parcel 5, in which the part of Holborough Quarry within Medway is wholly located, and the adjacent parcel 4 are shown on **Figure 3**.
- 3.6 The MGBR comprises a definition of Green Belt boundaries, identifies washed over and inset settlements, a review of policy and an assessment of identified study area parcels based on a process of selection.

Review of MGBR Methodology

Definition of Green Belt Boundaries

- 3.7 The MGBR rightly recognises that the defined parcels are strategic in nature and go only as far as informing site allocations, rather than stipulating them outright. The identification of permanent boundaries follows NPPF policy.

- 3.8 The land parcel sizes do however vary considerably and should not be weighed against one another on that basis. It is not clear why, for example, parcel 5 – which is considerably larger than the other four parcels - cannot be reduced in size using the woodland blocks, quarries and lakes as clearly defined permanent boundaries.

Green Belt Policy Criteria

- 3.9 MGBR helpfully clarifies some definitions of Green Belt policy terms which are contextually relevant:
- Purpose (a): ‘large built up areas’ are the urban extremities of Strood; Halling is not included;
 - Purpose (b): ‘towns’ are listed as Strood, Rochester, Chatham, Gillingham and Rainham, relating to the Local Plan;
 - Purpose (c): “*the main consideration should be whether the rural character of the area would be threatened or overwhelmed by urbanising influences*”; and
 - Purposes (d), and (e) of the NPPF Green Belt tests have been discounted by Medway.
- 3.10 We support the specific definitions of ‘large built up areas’ and ‘towns’ used for Purposes (a) and (b) as set out by the Council and recommend that it is consistently used in future assessments.

Parcel Assessment

- 3.11 The MGBR provides pro-forma templates, ‘C’ which should be used alongside terminology in template ‘A’ to assist in describing each parcel. The templates are useful because they break down the Green Belt tests using clear criteria. The pro-forma templates include requirements to provide an assessment of the appraisal considerations, additional comments and a contribution to each criteria, as well as an overall contribution to each test. There are ten criteria spread across the three tests.
- 3.12 However, there is no reference in the MGBR to a presentation of these findings against the pro-forma templates for each parcel. The descriptions for each land parcel consequently read like a summary and do not address each of the criteria in detail; they do not provide ten clear responses, ten criteria contributions or overall contributions individually to each test.
- 3.13 The descriptions also do not provide an overall balance of these contributions in a way that clearly informs the final reasoning on the overall contribution the parcel makes to the purpose and aims of Green Belt.
- 3.14 The MGBR rightly recognises that assessment of Green Belt is not an assessment of landscape quality, but that landscape assessment can be used to identify features that could form boundary amendments or differentiating between unspoilt countryside or semi-rural areas. This approach however doesn’t comment on ‘character’ in relation to adopted landscape character assessments. It is therefore just a simplified differentiation between landscape features, and not a recognition that they form part of a specific pattern of key characteristics within the landscape.
- 3.15 We recommend that future assessments make full use of the pro-forma approach allowing an analysis of the assessments being made.

Boundary Anomalies

- 3.16 No anomalies apply along the Site’s boundaries with the Green Belt.

- 3.17 Should Green Belt boundaries be amended, then the opportunity to remove the Site from the Green Belt can be undertaken by following the edges of the disused quarries. The quarries are permanent, highly legible features within the landscape. The ability to create strong defensible boundaries in the future as part of good development and green infrastructure planning should not be overlooked.

Washed Over and Inset Status of Settlements

- 3.18 In similar fashion to the other parts of the assessment, the pro-forma template for assessing washed over and inset settlements is only summarised in the MGBR. It would be helpful to have a deeper understanding of how the criteria has been applied.

Other Planning Considerations

- 3.19 The MGBR provides no reasoning for why cited relevant planning decisions are relevant for each parcel. The number of relevant planning considerations are also heavily influenced by the size of the land parcel e.g. it is unsurprising that land parcel 5 had, at the time of the assessment, seven planning applications; whereas parcel 1 had just one, and parcel 3 – being a sliver of land between two main roads – had none.
- 3.20 The MGBR states that the washed over settlements Upper Halling and Upper Bush are assessed as part of the review, to inform a boundary review or preparation of policies to protect the villages. Upper Halling is situated on the north-western boundary of the Site.
- 3.21 We recommend that greater rigour is applied to the analysis of planning decisions, though we in any case challenge the merits of the approach.

Summary of Review

- 3.22 This review has identified a significant lack of evidence demonstrating how individual land parcels contribute to each purpose of the Green Belt. This is principally related to the absence in the MGBR of a detailed assessment of the parcels in relation to its own pro-forma. The following section provides a review of the part of the Site within Medway using the pro-forma provided by the MGBR.

The Impact of the Release of the Site from the Green Belt

Review of Land Parcel no. 5

- 3.23 The part of the Site within Medway is located in the southern portion of land parcel no. 5, as defined in the MGBR. The assessment results for parcel no. 5 are presented in **Table 3.1** below:

Purpose (a)	Purpose (b)	Purpose (c)	Aims	Summary
M	M	H	H	M/H

Table 3.1: MGBR Summary of Assessment Results for land parcel 5

- 3.24 Parcel 5 describes several features that do not correspond with the part of the Site within Medway. These are:
- Large land parcel;
 - Characterised by steep wooded scarp slope, steep rolling dry valleys, woodland blocks and woodland shaws (**Figure 4** illustrates that the steeper ground lies to the west of the Site);
 - Boundary with Cuxton;

- Former cement works at North Halling, now residential development.

3.25 The description is limited to references to the part of the Site within Medway where it identifies:

- Large, disused and fenced off quarry situated immediately south of the Lower Halling;
- Disused quarry (Houlder) located to the south of Upper Halling on district boundary with Tonbridge and Malling;
- Both quarries washed over by Green Belt.

3.26 The MGBR make the following judgements on the contribution of the parcel to the Green Belt:

- High contribution to the Purpose and Aims of Green Belt;
- Moderate / High contribution when taking into account ten designations and seven planning applications;
- Significant contribution.

3.27 The geographic scale of the part of the Site within Medway compared to the land parcel is notable:

- Land parcel 5 covers an area of 919 hectares and is partly within the Kent Downs National Landscape, as illustrated by **Figure 6**;
- The part of the Site within Medway covers an area of just 63.5 hectares of this parcel, it shares an outer boundary with the Green Belt boundary and lies entirely outside of the National Landscape.

3.28 The part of the Site within Medway is therefore considerably smaller than the land parcel and is not comparable with the range of landscape features, or as sensitive in terms of designations and planning applications. This justifies the need to undertake a proportional assessment, to better inform the site allocation process. The results are presented overleaf, using the pro-forma supplied by the MGBR, preceded by a detailed site description to inform the assessment.

Review of the Holborough Quarry Site (part within Medway)

Site Description

3.29 The Site is situated to the west of the A228, bounds Halling to the north and Upper Halling to the north-west; straddles the local road named Pilgrims Way and occupies land to the west and flows into a disused quarry and countryside to the south. Between Halling and Upper Halling, the Site boundary is alongside several fields and a disused quarry. Neither Halling nor Upper Halling are defined as 'towns' under Medway Council's MGBR definitions.

3.30 Excluding the quarries, which reflect man-made changes to topography, much of the Site has a sloping easterly aspect with a slight fall to the south-east. The topography is illustrated by **Figure 4**, showing that the steep sided escarpment and dry valleys cited for land parcel 5, are located outside of the Site. The slope exhibited within the Site is comparatively more gentle and thus less sensitive in that regard.

3.31 Land uses and landscape features which contribute to landscape character, as illustrated by **Figure 5**, comprise agricultural (arable/pasture), within a pattern of irregular shaped large fields within the central and eastern parts. A disused quarry is situated in the far western part of the Site, straddling a short section of Pilgrims Way. Internal hedgerow field boundaries vary in condition and continuity,

with several within the central eastern area being barely legible or completely disconnected from a recognisable pattern.

- 3.32 The southern and western areas are strongly wooded within the fenced off, disused quarries. With regard to the description of land parcel 5, this is not representative of the defined woodland blocks and interlinking shaws found further north in the parcel or in the National Landscape.
- 3.33 Whittings Farm is situated in the far eastern part of the Site, accessed off the A228, very close to a roundabout that links with Peters Bridge. The farm has been diversified with several business occupancies with associated signage displayed at the farm entrance, as well as vehicular storage and a loose cluster of small barns and sheds. Urbanising influences predominate to the east along the Green Belt / Site boundary due to the A228 and associated traffic, and by tall street lighting on the approach to and around the roundabout.

Medway Council Green Belt Study

- 3.34 Note: the MGBR pro-forma refers to 'parcel', but for the purposes of using the same methodology, 'parcel' in these tables refers to the part of the Site within Medway. The definitions used by Medway Council for 'large urban area' and for 'towns' have been applied consistently in our assessment.

Other Factors

Boundary anomalies

- 3.35 None.

Washed over and inset areas

- 3.36 Upper Halling, on the Site's northern boundary, is washed over by the Green Belt.

Other planning considerations

Local Plan Policy Designations

- 3.37 The site is considerably smaller than the MGBR land parcel 5 and therefore not subject to the same high number of designations, and is not the subject of any other live applications. The distribution of designations is illustrated on **Figure 6** and illustrates that.
- western portion of the Site, beyond Pilgrims Way, and situated within a disused quarry, lies within the Kent Downs National Landscape and a Local Wildlife Site.
 - Remaining area of the Site east of Pilgrim's Way is not constrained by relevant designations.

Relevant Planning Decisions

- 3.38 There are no additional planning applications within the Site.

Purpose (a)	Appraisal Considerations	Assessment	Additional Comments	Contribution
To check the unrestricted sprawl of large built-up areas	Is the parcel* at the edge of one or more large built up areas?	No	The nearest large settlement is Strood, located approximately 3km to the north-east.	Low
	Does the parcel prevent the outward sprawl of a large built up area into open land?	No	Interlinked with the criteria above, the Site does not lie on the edge of a large built up area.	Low
	Is the parcel part of a wider group of parcels that directly act to prevent urban sprawl?	Yes	<p>The part of the Site within Medway shares the southern boundary with the Snodland study area defined as an urban area in the Tonbridge and Malling Green Belt Study.</p> <p>However, it would require both parcels within Medway and Tonbridge and Malling to be entirely redeveloped, to result in a merging. Given the physical separation formed by the Site's quarries and southern boundary, and that masterplanning would follow good practice, including the provision of extensive areas of green infrastructure providing clearly defined gaps between areas of development, this would not occur.</p>	Moderate
	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.	Partial	The majority of the boundaries delineating the part of the Site within Medway are drawn through open countryside alongside clear, strong landscape features such as quarries, woodland and thick hedgerows. The exception lies along a very short boundary within the northern triangle between Halling and the A228.	Moderate - Low
			Overall Contribution	Moderate
Purpose (b)	Appraisal Considerations	Assessment	Additional Comments	Contribution

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?	No	The part of the Site within Medway is situated at a considerable distance from the Medway towns and does not lie within a recognisably sensitive or designated gap.	Low
	Would development in the parcel result in the merging of towns?	No	Development of part of the Site within Medway would leave considerable areas of open countryside between the towns.	Low
	Is the parcel part of a wider group of parcels that directly act to prevent the merging of neighbouring towns?	Partial	The part of the Site within Medway is located adjacent to the Tonbridge and Malling Snodland study area and within parcel 5. But it is separate from Snodland and not located in proximity to any of the five towns in Medway. Therefore redevelopment of it would not result in merging of these towns.	Moderate
Overall Contribution:				Moderate - Low
Purpose (c)	Appraisal Considerations	Assessment	Additional Comments	Contribution
To assist in safeguarding the countryside from encroachment	Does the parcel assist in safeguarding 'the countryside' from 'encroachment' – terms as defined in Appendix A.	Partial	The part of the Site within Medway partly comprises arable land and quarries, which are characteristic of the landscape. Arable land is not rare or unique and the overall form of quarries can be protected so they retain their defining characteristics.	Moderate
	Are there clear, strong and robust boundaries (e.g. river, road, railway, urban edge) to contain development and prevent encroachment in the long term?	Yes	The robust boundaries that are currently present would contain the land in question, this leads to the parcel itself making a relatively low contribution to this purpose. The part of the Site within Medway can incorporate robust planting between the quarries and the boundaries in a manner which is consistent with the recommended guidelines of the adopted landscape character assessments.	Moderate - Low

	Describe the character of the countryside within the parcel. Include description of land uses, built development, topography, urbanising or fringe uses.	Partial	With reference to the detailed site description, the part of the Site within Medway is predominantly arable/pasture; woodland is related to the quarries and not the more sensitive woodland blocks and shaws found elsewhere in the parcel and more sensitive National Landscape; a small area of built form is situated within the parcel, this being within a corridor of urbanising influence formed by the A228 and street lighting;	Moderate
	Overall Contribution			Moderate

Results / Analysis

- 3.39 The result of the analysis of land parcel 5 undertaken in the MGBR, was Moderate/High, and this was considered to be significant. It placed it in the same category as Parcel 1, which was also the smallest parcel in the review.
- 3.40 The analysis of the much smaller part of the Site within Medway, using the Council's own methodology, has demonstrated the following:
- **Overall Contribution:** Moderate - Low. The contribution is not significant.
 - **Purposes:** Out of ten criteria, the part of the Site within Medway makes a Moderate score against one criteria for Purpose (b) and 3; a Moderate – Low score against one criteria for Purposes 1 and 3, and scores 'Low' against the remaining six criteria spread across the three Purposes. This informs the reasoning for shifting the balance of the overall contribution to Moderate-Low.
 - **Aims:** If the part of the Site within Medway is to be inset, the remaining land parcel 5 within the Green Belt will still be able to perform its wider function of remaining permanently open. Neither the main towns or large settlement areas within Medway or cross-border with Snodland in Tonbridge and Malling will merge.
 - **Permanent Boundaries:** The disused quarries around the northern boundary of the part of the Site within Medway provide a permanent, recognisable landscape feature along which to re-draw Green Belt boundaries, and to tie in with existing field boundary boundaries. The field boundaries can be reinforced in a manner that is consistent with recommended landscape character assessments.

Conclusion

- 3.41 This appraisal is made on the Medway Green Belt Review, published in December 2018 for Medway Borough Council. Matters addressed include the Review's methodology, findings, limitations and further detailed analysis of the part of the Site within Medway.
- 3.42 The Medway Green Belt Review, 2018 (MGBR), has been considered in terms of its robustness and contribution to providing a meaningful evidence base to inform the draft local plan. The MGBR has identified and tested five land parcels against the purposes of Green Belt. The part of the Site within Medway is situated within the considerably larger land parcel no. 5.
- 3.43 It is helpful that the MGBR is recognised as a strategic document used to inform site allocations, but not to stipulate what these are. However, a substantial lack of detail and absence of testing land against its own pro-forma templates has meant that the assessment is no more than a summary, and no meaningful evidence has been provided to justify how land parcel no. 5 makes a Moderate / High contribution to the Green Belt.
- 3.44 Using the same pro-forma templates and with application of the same definitions, it has been demonstrated that the part of the Site within Medway would score a Moderate - Low contribution to the Green Belt. The disused quarries within the Site are legible, permanent landscape features along which to re-draw Green Belt boundaries and reinforcement of existing field boundaries can be achieved in accordance with the adopted landscape character assessment.
- 3.45 Allowing for the Green Belt boundaries to be re-drawn to inset the part of the Site within Medway from the designation, the permanence and openness of the Green Belt can be assured.

Table 3.2 Summary

Purpose	Performance of the site
Purpose (a) To check the unrestricted sprawl of large built-up areas	Moderate
Purpose (b) To prevent neighbouring towns from merging into one another	Moderate - Low
Purpose (c) To assist in safeguarding the countryside from encroachment	Moderate
Purpose (d) To preserve the setting and special character of historic towns	Not considered in GBR
Purpose (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not considered in GBR

4. TONBRIDGE AND MALLING BOROUGH COUNCIL GREEN BELT ASSESSMENT

- 4.1 The Site lies entirely within the Metropolitan Green Belt. This appraisal is made for latest Green Belt Study, published in September 2016, for the Tonbridge and Malling Regulation 18 Local Plan September 2022 (the LPA).

Purpose of Representations

- 4.2 These representations focus on the current Tonbridge and Malling Green Belt Study, published in September 2016, and in particular the assessment of the area in which the part of the Site within Tonbridge and Malling is located, as illustrated by **Figure 7**. It will address the following:

- Review the methodology;
- Identify any issues with the methodology;
- Identify the positives raised by the current Green Belt studies with regard to the part of the Site within Tonbridge and Malling;
- Address the limited impact of the part of the Site within Tonbridge and Malling on the Green Belt.

- 4.3 The LPA has published two additional documents relating to Green Belt matters, which will also be considered as part of this appraisal:

- Stage 2 Green Belt Assessment Exceptional Circumstances (Strategic) Note, 27 July 2022;
- Green Belt Study: Stage Two Report, August 2018.

- 4.4 These representations should be read in conjunction with the following figures included in this report:

Figure 7: Proposed Site Location

Figure 8: Green Belt Land Parcels

Figure 9: Topographical Relief

Figure 10: Landscape Features

Figure 11: Designations

Consideration of Green Belt Evidence Base

- 4.5 This section provides a review and consideration of the three identified documents in the LPA's evidence base relating to Green Belt matters.

Tonbridge and Malling Green Belt Study September 2016

- 4.6 The Tonbridge and Malling Green Belt Study undertakes assessment of the Green Belt within the authority, as well as to review the clarity of the current Green Belt boundaries. The location of the part of the Site within Tonbridge and Malling, relative to the Green Belt and the nearest adjoining study area, being Birling to the south, is shown on **Figure 8**. The Metropolitan Green Belt washes over several authorities, including Medway Council, which adjoins the northern boundary of Tonbridge and Malling.
- 4.7 The study was published in September 2016, to inform the then emerging Local Plan, and is now over seven years old. Consequently, it does not include references to updated PPG guidance published in

2019, in relation to additional considerations which can inform the extent to which land meets the purposes of the Green Belt.

Review of Methodology

Definition of Study Areas

- 4.8 The study has defined smaller parcels around Tonbridge, but to the west of Snodland, it has defined considerably larger study areas using parish boundaries, which is the case for Snodland and Birling. The study states that this is due to its “wider/general” scale, and “not on a plot by plot basis”. As such, the study distances itself from being used to determine where there is variability in the performance of more discrete parcels of land. Consequently, there is no way of identifying granularity in the performance of land the further it lies from the settlement and built-up areas.

Green Belt Policy Criteria

- 4.9 The study helpfully clarifies some definitions of Green Belt policy terms which are contextually relevant:
- Purpose (a): built up areas are ‘a clear concentration or mass of housing or other buildings for example, including villages and towns’;
 - Purpose (b): neighbouring towns meaning identified Urban Areas, Rural Service Centres, Rural Settlements and other smaller areas as defined by the Core Strategy and listed in the study. The nearest urban area to the site is Snodland; the nearest rural service centre is Birling and there are no defined smaller areas in proximity;
 - Purpose (e) – no assessment is made by TMBC.

Study Assessment

- 4.10 The study uses a pro-forma template with criteria that has been informed by a review of other similar studies. The template is useful because it breaks down the Green Belt tests using clear criteria, however the range of criteria is relatively limited compared to the Medway pro-forma templates. This adds to the issue that there is limited opportunity to identify variations in which study areas perform against the Green Belt purposes.
- 4.11 The study does not provide a final balancing of these tests. Instead, it invites further study options, including detailed studies of land that has a limited contribution to the purposes of the Green Belt. To advance that decision making process, an assessment of the part of the Site within Tonbridge and Malling against the pro-forma has been provided below.

Green Belt Study: Stage Two Report, August 2018

- 4.12 The purpose of the Stage Two report is to ‘establish the exceptional circumstances for amending the Green Belt boundary in Tonbridge and Malling’, informed by and to complement the Stage 1 report, published in September 2016. It notes that there are ‘no genuine options’ for sustainable development to take place ‘that do not involve the release of some sites from the Green Belt’ (para. 3.17). It may be that this is a consequence of the Stage 1 report being too rigid in its outcome.
- 4.13 The report considers three options for justifying release of Green Belt: 1, Employment land; 2, Need for housing, which in turn would deliver affordable housing; and 3, Delivery of infrastructure.

- 4.14 In relation to housing delivery, the report concludes both that the release of sites from the Green Belt should be 'where they are needed in a sustainable pattern' (para. 3.22) and that the 'significant issue of housing affordability' justifies that exceptional circumstances exist (para. 3.24).
- 4.15 In relation to delivery of improved infrastructure, the report lists several locations where improvements could be delivered. These are described as already allocated or due to be allocated, which suggests that this Stage 2 report is in part a post-rationalisation for the Local Plan. For example, a strategic allocation is described in south-west Tonbridge, but if two areas of the land are not released, there would be insufficient land to generate a new school (para. 3.31).
- 4.16 The Stage Two report wields considerable influence through being able to recommend Green Belt boundary deletions. The report provides high-level evidence in relation to the borough as a whole. But it would be reasonable to expect that to justify an exceptional case, a considerable evidence base should be presented for each site. However, the report does not do this. Instead, it presents a very light summary description, vaguely relating to some areas but providing no detailed evidence for each site. Furthermore, contrary to NPPF para.143, it does not identify how the revised boundaries will be readily recognisable and permanent.
- 4.17 The Stage Two report concludes that approximately 200 hectares of Green Belt land derived from 12 sites could be released. As there is a significant need for affordable housing and significant infrastructure improvements, it seems unclear how these shortfalls could be addressed through the piece-meal release of sites scattered across the borough presented in the report. The scattered locations and their small scale do not indicate a strong pattern of sustainable development.

Stage 2 Green Belt Assessment Exceptional Circumstances (Strategic) Note, 27 July 2022

- 4.18 The note allows the LPA to look beyond their previous Green Belt studies in order to understand how exceptional circumstances could apply. It is not an assessment of the suitability of land against the purposes of the Green Belt, and it does not identify areas of land for removal.
- 4.19 The test for Exceptional Circumstances is underpinned by the requirement to address three strategic functions across the LPA: need, availability of land, and alternatives. The note is helpful in providing further guiding parameters for justifying where exceptional circumstances exist.
- 4.20 The note recognises that there should be a case for release of particular areas from the Green Belt, and, that this should be site-specific. This is also helpful, as it supports the need for individual representations to be made for sites coming forward, such as the Proposed Site.

The Impact Of The Release of the Site from the Green Belt

- 4.21 Having undertaken a review of the LPA's evidence base relating to Green Belt, this section focuses on the approach taken in the Stage 1 2016 report, and how this can be applied to part of the Site within Tonbridge and Malling.

Review of Snodland and Birling Study Areas

- 4.22 The Snodland and Birling study areas were assessed in the LPA's Stage 1 study against four of the five NPPF Green Belt tests, the results of which are provided below, with full detailed provided in Appendix 1.

Green Belt Purpose	Snodland	Birling
Purpose (a) - Check unrestricted sprawl	Performs well	Performs well
Purpose (b) - Prevent neighbouring towns from merging into one another	Performs moderately	Performs moderately
Purpose (c) - Assist in safeguarding countryside from encroachment	Performs well	Performs well
Purpose (d) - Preserve setting and special character of historic towns	Limited or no contribution	Performs moderately

Table 4.1: Summary of Assessment Results for the Snodland and Birling study areas

4.23 The geographic scale of the Proposed Site compared to the Snodland study area is notable:

- Snodland study area covers an area of 919 hectares and much of this is within the Kent Downs National Landscape, as illustrated by **Figure 11**;
- Birling covers an area of 680 hectares, similarly with a high level of coverage by the Kent Downs National Landscape;
- Together they constitute an area of 1,559 hectares.
- However the part of the Site within Tonbridge and Malling only covers an area of around 308 hectares and shares its eastern outer boundary with the Green Belt boundary and the majority of it lies outside of the National Landscape.

4.24 The considerable difference in areas highlights the ineffectiveness of the study as a means by which to recognise where variation in performance against the Green Belt tests can occur. The smaller defined part of the Site within Tonbridge and Malling enables a more geographically representative analysis to be carried out.

Review of the Holborough Quarry Site (part within Tonbridge and Malling) Site Description

4.25 The Proposed Site is situated to the west of the A228 and bounds Snodland and Holborough along much of its eastern boundary. The northern boundary is defined partly by a disused quarry which adjoins with defined field boundaries, as illustrated by the landscape features on **Figure 10**. The western boundary is defined partly by the local road named Pilgrim's Way, as well as woodland and steeper sloping ground. The southern western and southern areas are defined by defined field boundaries, large-scaled high voltage energy infrastructure, Snodland Road, Birling Hill (road), and Stangate Road. Ladds Lane is a local road extending through the northern portion of the Proposed Site, and it connects with Pilgrims Way to the west, and Holborough and the A228 to the east.

4.26 A cluster of farm buildings straddles Paddlesworth Road, close to the western boundary of the Proposed Site. The road extends eastwards through the Proposed Site and connects with Snodland and extends westwards into the wider countryside.

4.27 Several footpaths and bridleways extend across the Proposed Site, generally around the edges of large fields and on the land rising up into the North Downs and the National Landscape to the west. The topography is illustrated by **Figure 9**. From these higher elevations, far-reaching views can be experienced eastwards to the low-lying urban areas within the broad River Medway valley. Within the interior of the Proposed Site there are several disused quarries which have benefited from

conversion into woodland areas, lakes or have been left to self-seed as grassland or scrub. However, these are not publicly accessible.

- 4.28 Fields are generally large and irregular in shape, with a few small pockets of pasture near field corners, or on the edges of the quarries, as illustrated by **Figure 10**. Field boundaries are generally well defined by hedgerows, but these are typically narrow and have not been allowed to develop a truly bushy form due to over-management.
- 4.29 Designations are presented on **Figure 11**. As aforementioned, the Kent Downs Area of Outstanding Natural Beauty partly covers the western portion of the Proposed Site. Much of this area also contains the high energy infrastructure which reduces the susceptibility of this part of the National Landscape. A local wildlife site is located near to the north-eastern portion; one Conservation Area is located near the western boundary where it relates to the cluster of farm buildings on Paddlesworth Road. Several listed buildings are also found along Paddlesworth Road and towards the east of the Proposed Site. These are relatively small designations that can be accommodated within the Proposed Site and emerging design proposals.
- 4.30 The performance of the part of the Site within Tonbridge and Malling against the purposes of the Green Belt, as defined by the criteria used in the study, is presented in the tables overleaf.

Purpose (a)	Key Questions	Assessment Criteria	Assessment – Proposed site	Contribution
To check the unrestricted sprawl of large built-up areas	<i>Does the land have a role to play in containing development?</i>	<i>Area context – containment provided by adjoining areas</i>	The study areas contain development across the entire parish boundary beyond Snodland. However, the part of the Site within Tonbridge and Malling could be removed from the Green Belt, and there would still be a considerable area of land to contain development and maintain wider openness across the Green Belt.	Performs Moderately
	<i>Are there any other features/designations that provide this function?</i>	<i>Any permanent and recognisable physical boundaries and features such as roads, topography, woodland, lakes, watercourses etc</i>	Much of the western portion of the study areas are also constrained by the National Landscape. A small Local Wildlife Proposed Site can be buffered but doesn't offer a strategic role. Permanent boundaries exist along much of the western boundary of the part of the Site within Tonbridge and Malling, including mature woodland and Pilgrim's Way road; a quarry edge along the northern boundary; high voltage energy infrastructure. These would allow the Green Belt boundaries would endure	
Purpose (b)	Key Questions	Assessment Criteria	Assessment – Proposed site	Contribution
To prevent neighbouring towns from merging into one another	<i>What is the surrounding context and proximity to nearby settlements and built-up areas?</i>	<i>The significance of the Green Belt in a wider, strategic sense</i>	Open rural farmland and areas of woodland exist between the part of the Site within Tonbridge and Malling and Birling, these would prevent merging.	Performs Moderately
	<i>Has the presence of the Green Belt designation in itself protected against merging historically and presently?</i>	<i>Whether there is potential for development to result in a merger of built-up areas and/or neighbouring authorities</i>	The Snodland study area works in conjunction with the Medway Green Belt to prevent merging with Halling to the north. The nearest large built-up area in Medway, being Strood, is geographically remote from Snodland and so merging would not occur. Permanent boundaries include woodland, quarries, roads and prominent energy infrastructure.	

		<i>Any permanent and recognisable physical boundaries such as roads, woodland, lakes, watercourses etc</i>		
Purpose (c)	Key Questions	Assessment Criteria	Assessment – Proposed site	Contribution
To assist in safeguarding the countryside from encroachment	<i>What is the surrounding context and character and might this change?</i>	<i>The character and context of the surrounding land, and whether it is open countryside, urban or rural/semi-rural</i> <i>The definition of the existing Green Belt boundaries</i> <i>Any permanent and recognisable physical boundaries such as roads, woodland, lakes, watercourses etc</i>	<p>The part of the Site within Tonbridge and Malling comprises very large, irregular sized fields, but the immediate context extending along the full extent of the eastern boundary, is with the urban edge of Snodland and Holborough and the A228. The south-western portion is influenced by the high voltage energy infrastructure.</p> <p>By comparison, the remaining portions of Snodland and Birling are wholly open countryside, rural or semi-rural around the edges of small rural centres and the majority of these areas are covered by the National Landscape.</p>	Performs Moderately
	<i>Are there any other designations in place such as Areas of Outstanding Natural Beauty (National Landscape)?</i>			

Purpose (d)	Key Questions	Assessment Criteria	Assessment – Proposed site	Contribution
To preserve the setting and special character of historic towns	<i>What is the relationship between the land and historic towns/places/areas and other heritage assets?</i>	<i>The proximity of the Green Belt to historic towns, villages, places, Conservation Areas, Historic Parks and Gardens, Ancient Monuments, Listed Buildings etc and its role and relationship with these features</i>	The part of the Site within Tonbridge and Malling is physically and visually buffered from the Snodland historic core. It washes over the Paddlesworth Conservation Area and Local Wildlife Site at Holborough.	Limited or no contribution.
	<i>Are there views, or other special qualities? Does the area provide a buffer? Are there other designations or features that provide this function?</i>		The emerging masterplan for the Site avoids built development in the National Landscape and provides a substantial buffer to the Paddlesworth Conservation Area, as well as being sensitive to the settings to listed buildings.	

Other Factors

Surrounding Constraints/Other Designations

- 4.31 In contrast to the Snodland area, only the far western portion of the part of the Site within Tonbridge and Malling lies within the National Landscape; there is no Special Area of Conservation.

Boundaries

- 4.32 The part of the Site within Tonbridge and Malling aligns tightly to the existing edge of Snodland and has permanent boundaries and/or features that can be reinforced. This includes disused quarries, roads and woodland. This will ensure that the Green Belt boundaries continue to be recognisable and permanent.

Openness

- 4.33 The proximity of the part of the Site within Tonbridge and Malling to the urban edge of Snodland, combined with the high voltage energy infrastructure to the south and west reduces openness compared to the more rural western and central areas of the Snodland and Birling study areas.

Future Commitments/Key Extant Planning Permissions

- 4.34 Ham Hill is described as a 'protected site' relating to the Snodland study area as well as works at Holborough Lakes. With regard to Ham Hill, this is geographically separated from the Proposed Site, which lies further to the north. Within the area of separation is a large distribution building, fields and a quarry. Holborough Lakes does not lie within the part of the Site within Tonbridge and Malling, and masterplanning can provide a soft and expansive buffer to this.

Results / Analysis

- 4.35 According to the LPA's Stage 1 study, Snodland study area 'Performed Well' against Purpose (a) and 3, 'Performed Moderately' against Purpose (b), and made a 'Limited or No Contribution' to Purpose (d). Birling performed the same against Purpose (a) – 3 and Performed Well against Purpose (d).
- 4.36 By comparison, having tested the part of the Site within Tonbridge and Malling against the same methodology and pro-forma, it 'Performed Moderately' against Purpose (a), 2 and 3 and made the same 'Limited or No Contribution' to Purpose (d).
- 4.37 The reason for differences against Purpose (a) relate primarily to the extent of National Landscape coverage that remains where it washes over the Snodland and Birling study areas. It also differs due to the larger geographic extent of Green Belt coverage that remains, to contain development.
- 4.38 For Purpose (c), the primary influence of the urban edge of Snodland combined with the high voltage energy infrastructure, reduces the performance of the part of the Site within Tonbridge and Malling.
- 4.39 The analysis of the part of the Site within Tonbridge and Malling area has demonstrated the following:
- **Inset from Green Belt:** If the part of the Site within Tonbridge and Malling is to be inset, the remaining Snodland study area within the Green Belt will still be able to perform its wider function of remaining permanently open. There would be no merging between Snodland and Birling, or between Snodland and Strood in the Medway section.
 - **Permanent Boundaries:** The disused quarries, prominent energy infrastructure, roads and woodland readily provide permanent, recognisable landscape features along which to re-draw

Green Belt boundaries. These can be tied in with existing field boundary boundaries and other landscape features in a manner that is consistent with recommended landscape character assessments and their defining qualities. The ability to create strong defensible boundaries in the future as part of good development and green infrastructure planning should not be overlooked.

Conclusion

- 4.40 This appraisal is made on the Tonbridge and Malling Green Belt Study Stage 1, published in January 2016. Matters addressed include the study's methodology, findings, limitations and further detailed analysis of the Proposed Site. This has found that the scale of the study lacks variability to allow for a meaningful understanding of the performance of the Green Belt close to the built-up area of Snodland, compared to the more rural, open countryside in the wider area. The study recognises that the scale of it should prompt further detailed studies, which this Green Belt Review seeks to achieve for a smaller, well defined Proposed Site.
- 4.41 The lack of granularity in the methodology and definition of smaller study areas has resulted in an outcome that has, unsurprisingly, left the LPA with very limited opportunities to identify strategic areas to be inset from the Green Belt. Two further studies in the LPA's evidence base indicate that the LPA has sought to use Exceptional Circumstances to justify release of Green Belt land. However, neither of these studies identify land that is of a scale to contribute to a recognisable pattern of sustainable development.
- 4.42 The part of the Site within Tonbridge and Malling is situated within the considerably larger Snodland study area and a very small area of the Birling study area.
- 4.43 The analysis of the part of the Site within Tonbridge and Malling has demonstrated that it performs less strongly than the wider Green Belt, is considerably less constrained by the National Landscape and other environmental designations, and is located where recognisable, permanent boundaries can be redrawn using criteria set out in the LPA's own pro-forma.
- 4.44 Overall, removal of the Proposed Site would not harm the wider function of the Green Belt and would maintain overall openness.

Table 4.2 Summary

Purpose	Performance of the site
Purpose (a) To check the unrestricted sprawl of large built-up areas	Performs Moderately
Purpose (b) To prevent neighbouring towns from merging into one another	Performs Moderately
Purpose (c) To assist in safeguarding the countryside from encroachment	Performs Moderately
Purpose (d) To preserve the setting and special character of historic towns	Limited or no contribution
Purpose (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not considered in GBR

5. SUMMARY

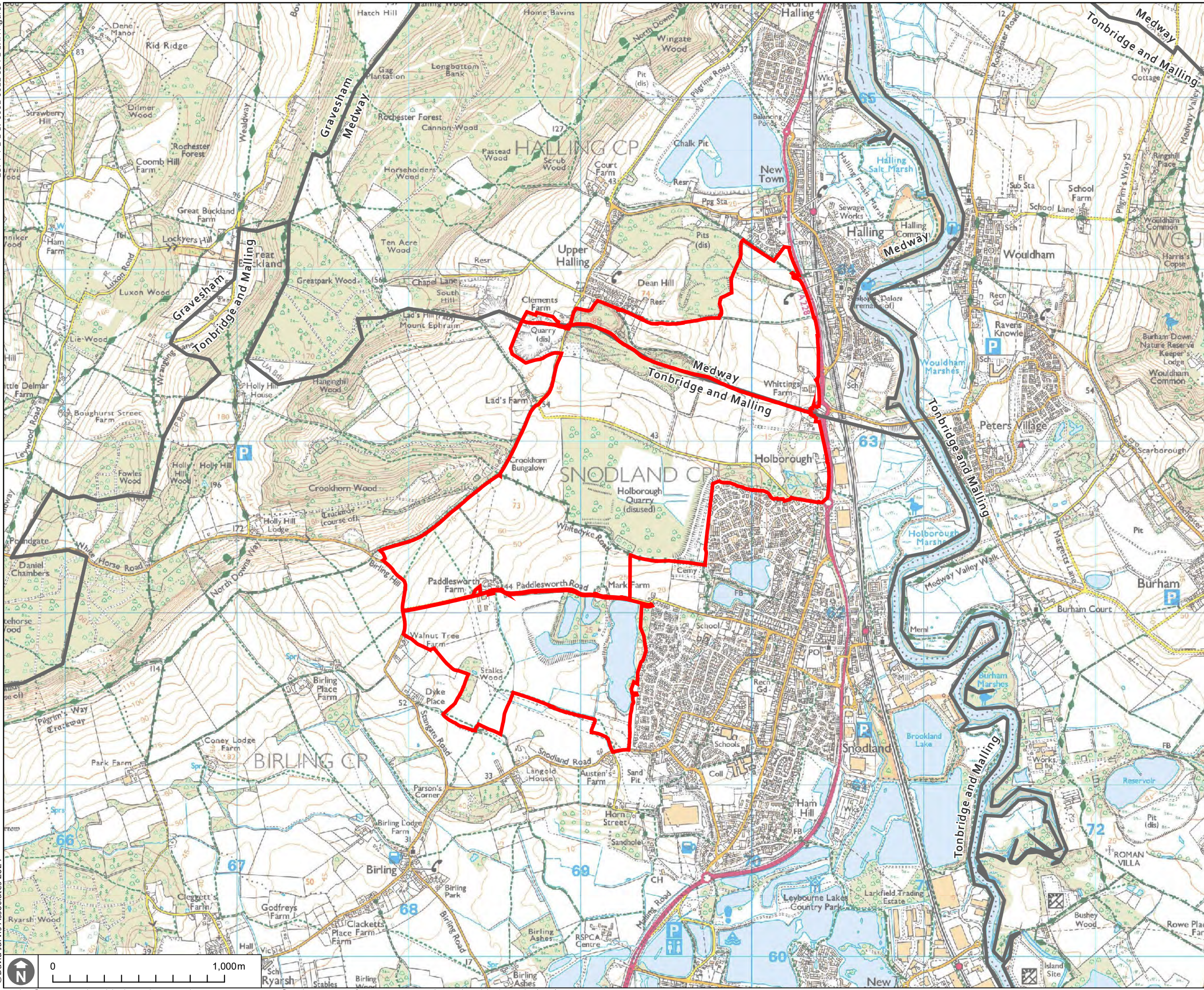
- 5.1 David Jarvis Associates Limited (DJA) is instructed by Hallam Land to provide advice on Green Belt relating to land at Holborough Quarry, Kent (the Site). The Site location is illustrated on Figure 1 and lies within the administrative areas of both Medway Council and Tonbridge and Malling Borough Council.
- 5.2 The purpose of this document is to review current and emerging Green Belt policy and to review the Green Belt assessments produced by Medway Council (MC) and Tonbridge and Malling Borough Council (TMBC) in the area of Holborough Quarry, Kent. This review is provided to assist both Councils in undertaking their respective Green Belt reviews, ensuring a consistency in approach in how Holborough Quarry is assessed.
- 5.3 The areas of the site that fall within each LPA area have been assessed against the respective methodologies used.
- 5.4 The consideration of cross boundary development must be addressed to avoid an artificial parcel boundary or district boundary becoming a determining factor in revisions to the GB boundary, when the considerations of landscape are far wider reaching. Please can we look at how we are responding to this.
- 5.5 A summary table of the results can be found below at **Table 5.1**.
- 5.6 Despite the variation in terminology used it is clear that overall, the site makes a moderate to low / limited contribution to the purposes of the Green Belt.

Table 5.1 Summary

Purpose	Performance of the areas of the site within Medway	Performance of the areas of the site within TMBC
Purpose (a) To check the unrestricted sprawl of large built-up areas	Moderate	Performs Moderately
Purpose (b) To prevent neighbouring towns from merging into one another	Moderate - Low	Performs Moderately
Purpose (c) To assist in safeguarding the countryside from encroachment	Moderate	Performs Moderately
Purpose (d) To preserve the setting and special character of historic towns	Not considered in GBR	Limited or no contribution
Purpose (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not considered in GBR	Not considered in GBR

Appendix 1

2874-4-1-1-LV-0001-0011-S5-P1 LVIA Figures ©David Jarvis Associates 2024



KEY

Application Boundary

District Boundary

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

FIGURE 1 - SITE LOCATION PLAN

Scale

1:20,000

Sheet Size

A3

Date

SEP 2024

Client Ref.

-

Drawing Ref.

2874-4-1-1

Drawing No.

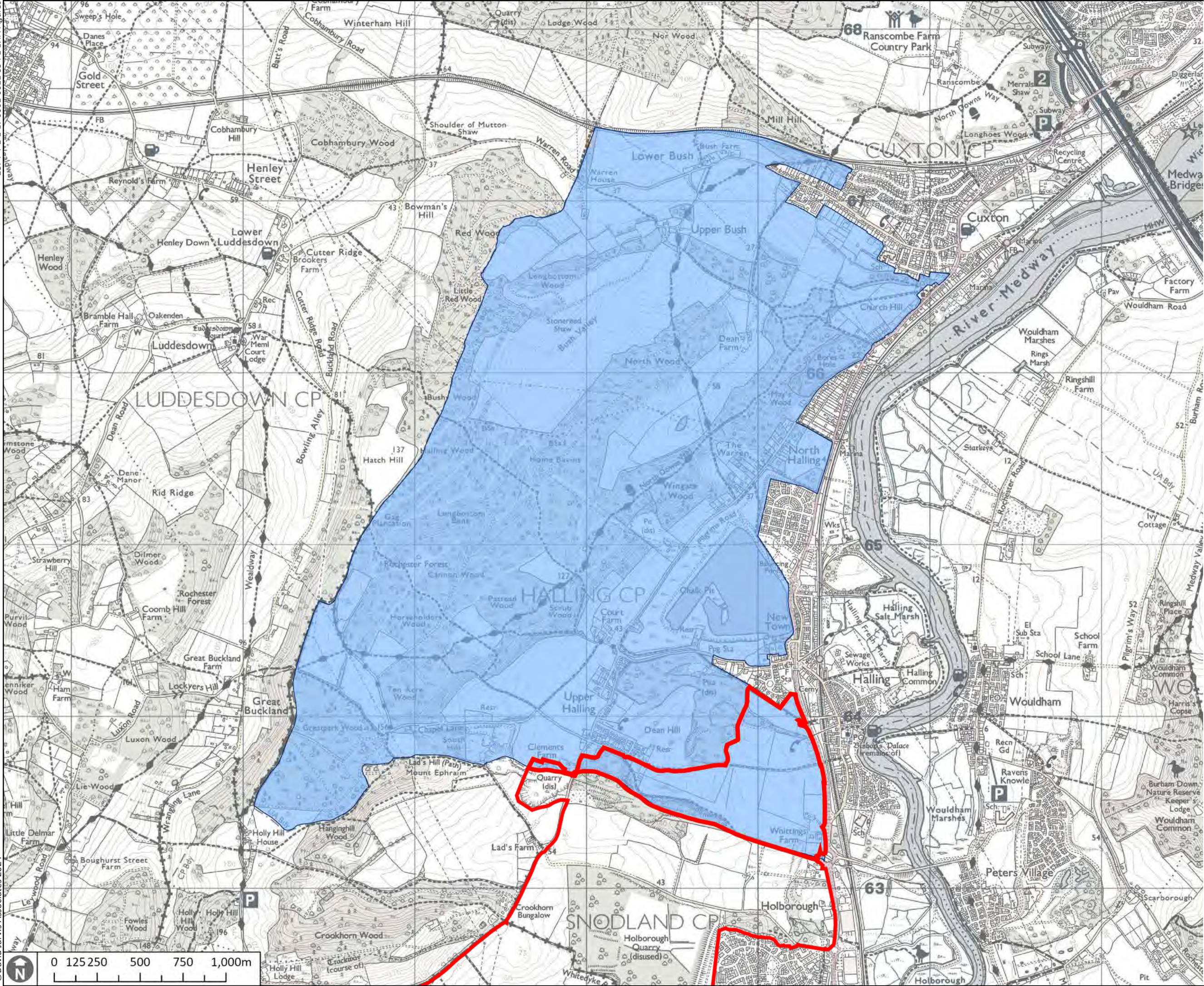
LV-0001

Version

S5-P1

2874-4-1-1-LV-0001-0011-S5-P1 LVIA Figures

©David Jarvis Associates 2024



KEY

Application Boundary

Land Parcel 5

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennison Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client
HALLAM LAND

Drawing Title
FIGURE 2 - SITE LOCATION PLAN (MEDWAY)

Scale
1:20,000

Sheet Size
A3

Date
SEP 2024

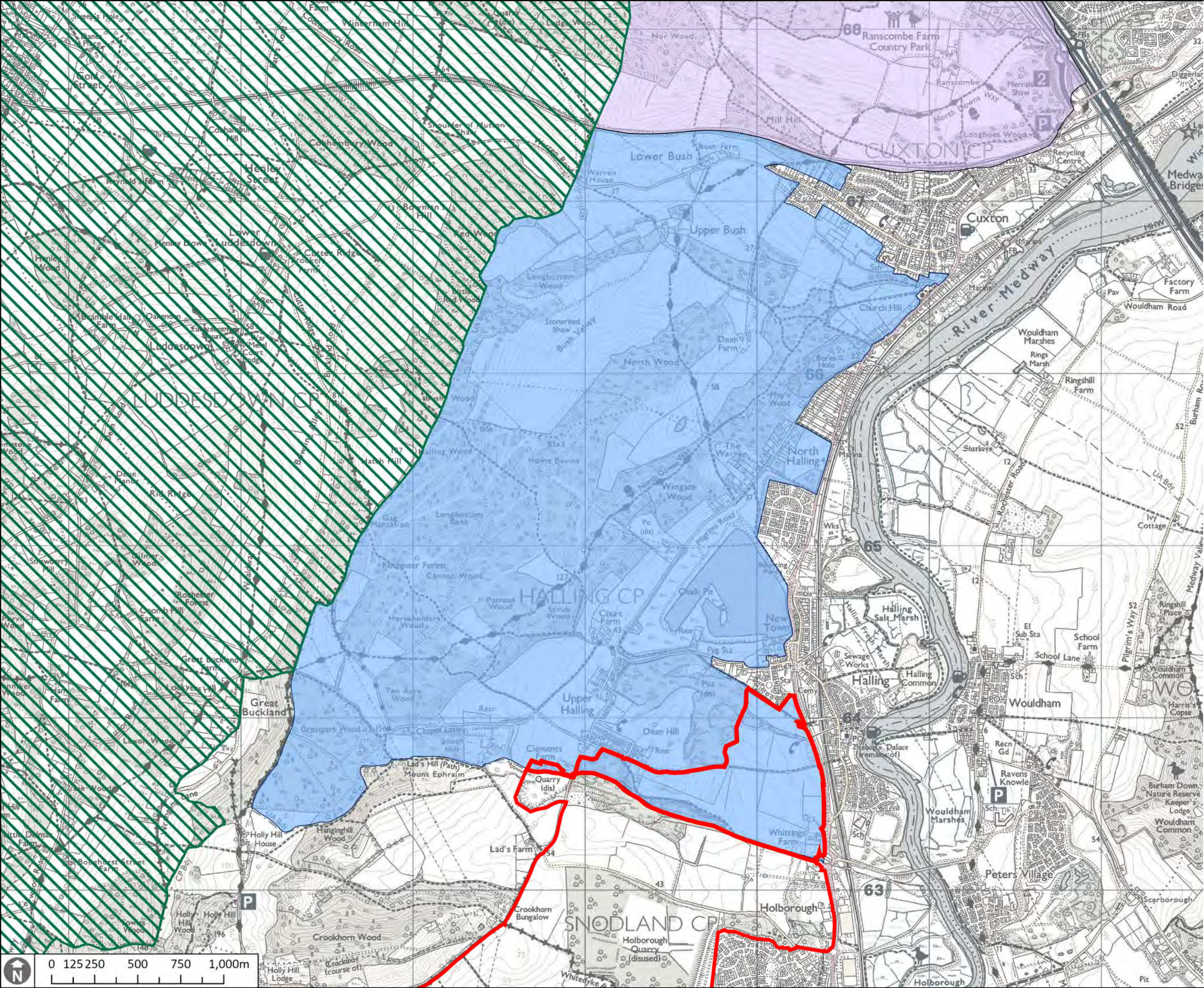
Client Ref.
-

Drawing Ref.
2874-4-1-1

Drawing No.
LV-0002

Version
S5-P1

OS data ©Crown copyright and database rights 2024 Ordnance Survey 0100031673. ©Local Government Information House Limited copyright and database rights (2024)



KEY

Application Boundary

Green Belt - Gravesham

Medway Green Belt Review 2018

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED

1 Tennyson Street, Swindon, Wiltshire, SN1 5DT

t: 01793 612173

e: mail@davidjarvis.biz

w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

FIGURE 3 - GREENBELT PARCELS (MEDWAY)

Scale

1:20,000

Sheet Size

A3

Date

SEP 2024

Client Ref.

Drawing Ref.

Drawing No.

Version

-

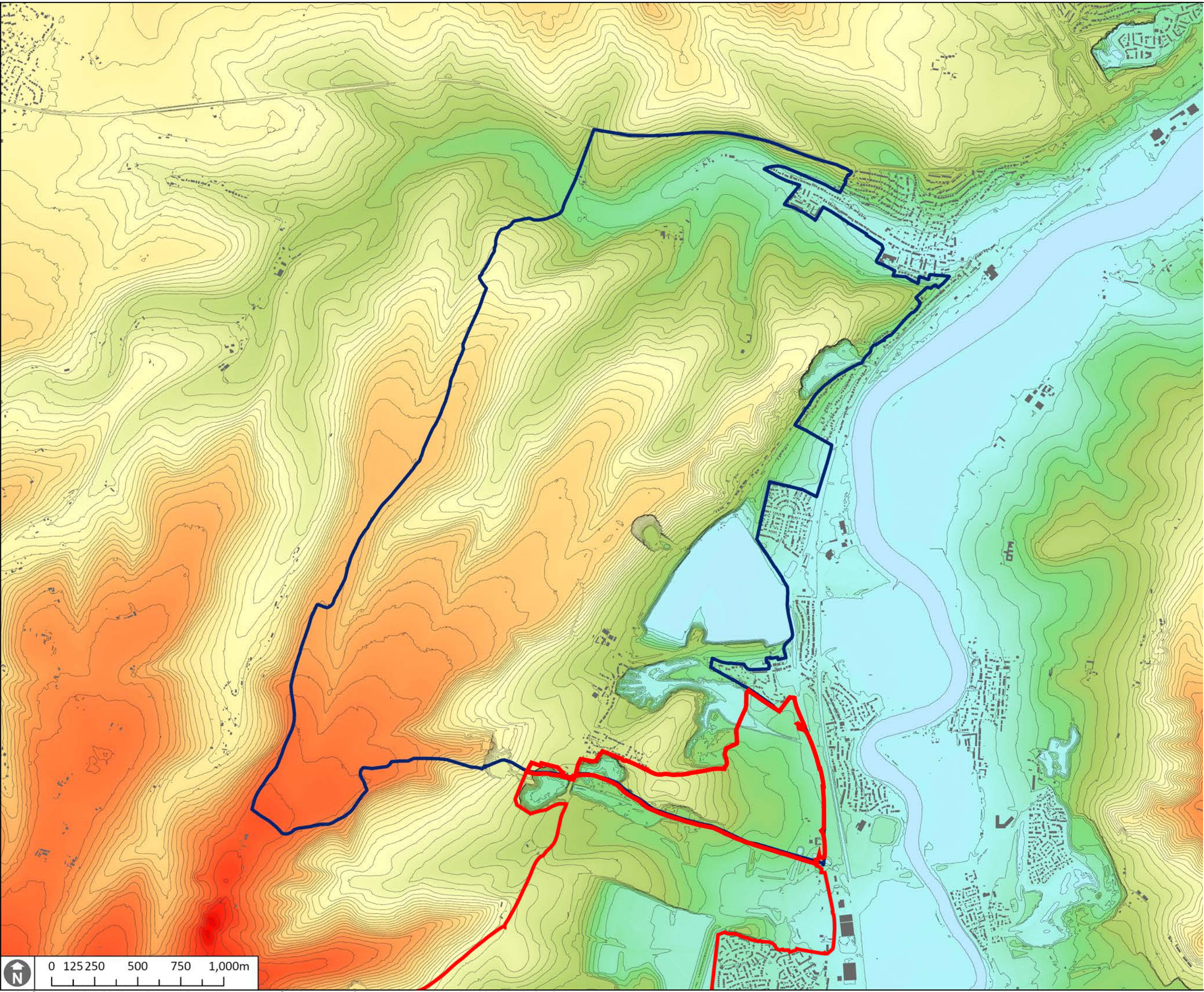
2874-4-1-1

LV-0003

S5-P1

2874-4-1-1-LV-0001-0011-S5-P1 LVIA Figures

© David Jarvis Associates 2024



KEY

Application Boundary

Land Parcel 5

196m AOD

-3 AOD

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

FIGURE 4 - TOPOGRAPHICAL RELIEF (MEDWAY)

Scale

1:20,000

Sheet Size

A3

Date

SEP 2024

Client Ref.

-

Drawing Ref.

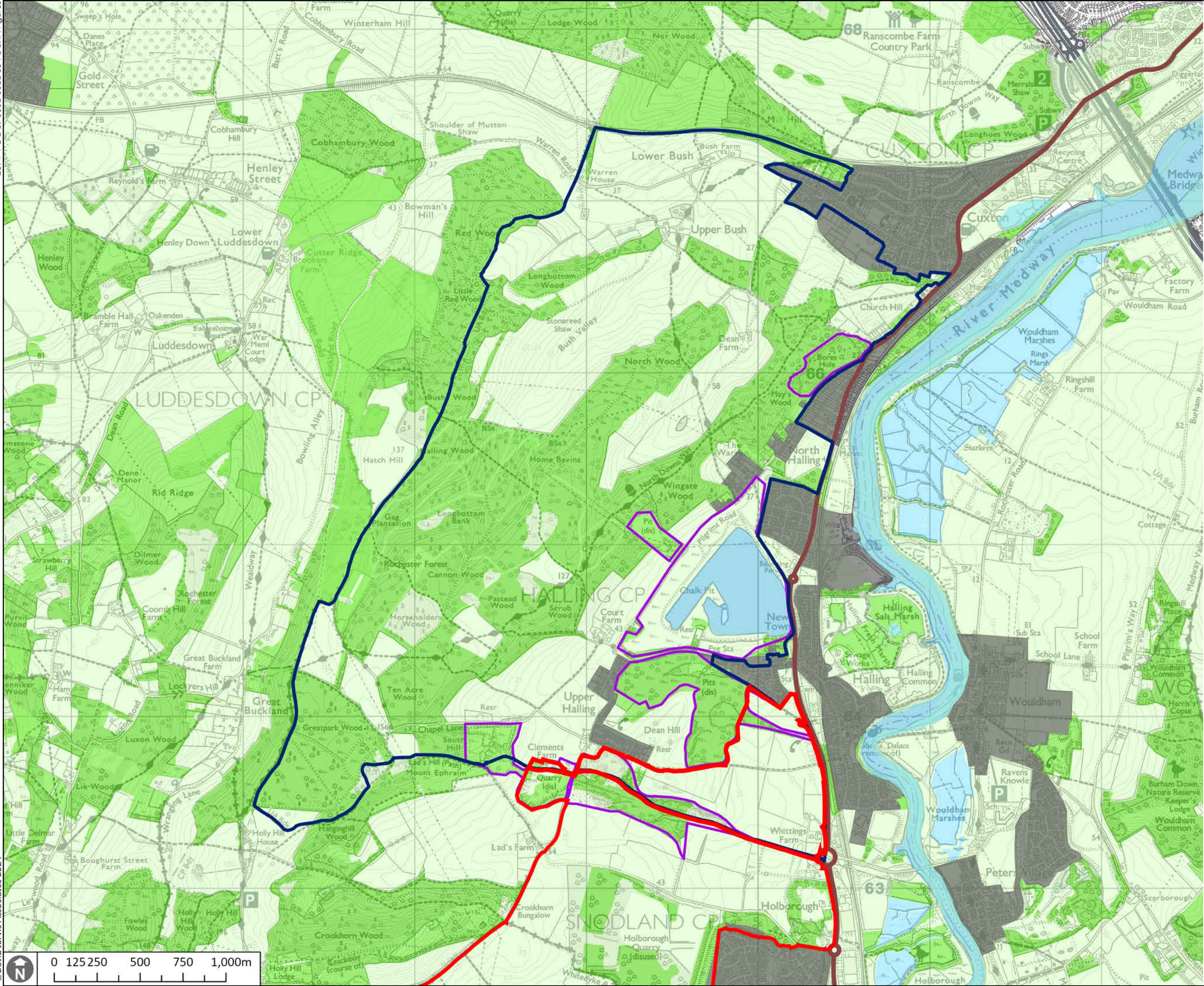
2874-4-1-1

Drawing No.

LV-0004

Version

S5-P1



KEY

- Application Boundary
- Land Parcel 5
- Previously Quarried Land
- Rivers & waterbodies
- Woodland
- Agricultural land
- Urban

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenynson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND

Project

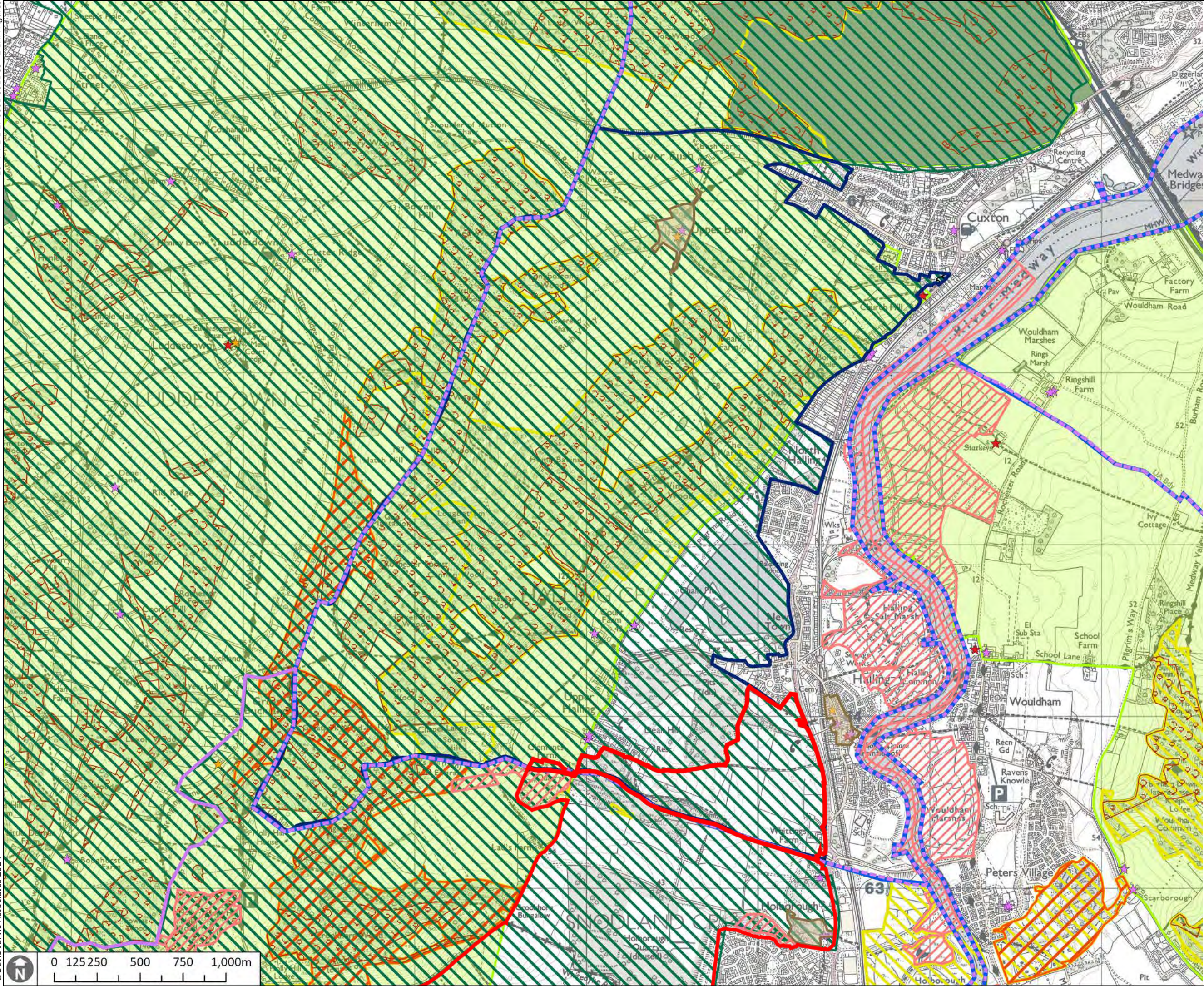
HOLBOROUGH QUARRY

Drawing Title

FIGURE 5 - LANDSCAPE CHARACTERISTICS (MEDWAY)

Scale	Sheet Size	Date
1:20,000	A3	SEP 2024

Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-1-1	LV-0005	S5-P1



KEY

Application Boundary

Land Parcel 5

County Boundary

Medway District BoroughBoundary

© Historic England 2023

Listed Buildings

Grade I

Grade II*

Grade II

Scheduled Ancient Monument

© Natural England 2023

Landscape Designations

Greenbelt Boundaries

Ancient Woodland

Ancient Replanted Woodland

Special Areas of Conservation

Sites of Special Scientific Interest

Country Parks

Areas of Outstanding Natural Beauty (AONB)

Local Authority Designations

Conservation Areas

Local Wildlife Sites

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED

1 Tennyson Street, Swindon, Wiltshire, SN1 5DT

t: 01793 612173

e: mail@davidjarvis.biz

w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

FIGURE 6 - LANDSCAPE DESIGNATIONS (MEDWAY)

Scale

1:20,000

Sheet Size

A3

Date

SEP 2024

Client Ref.

-

Drawing Ref.

2874-4-1-1

Drawing No.

LV-0006

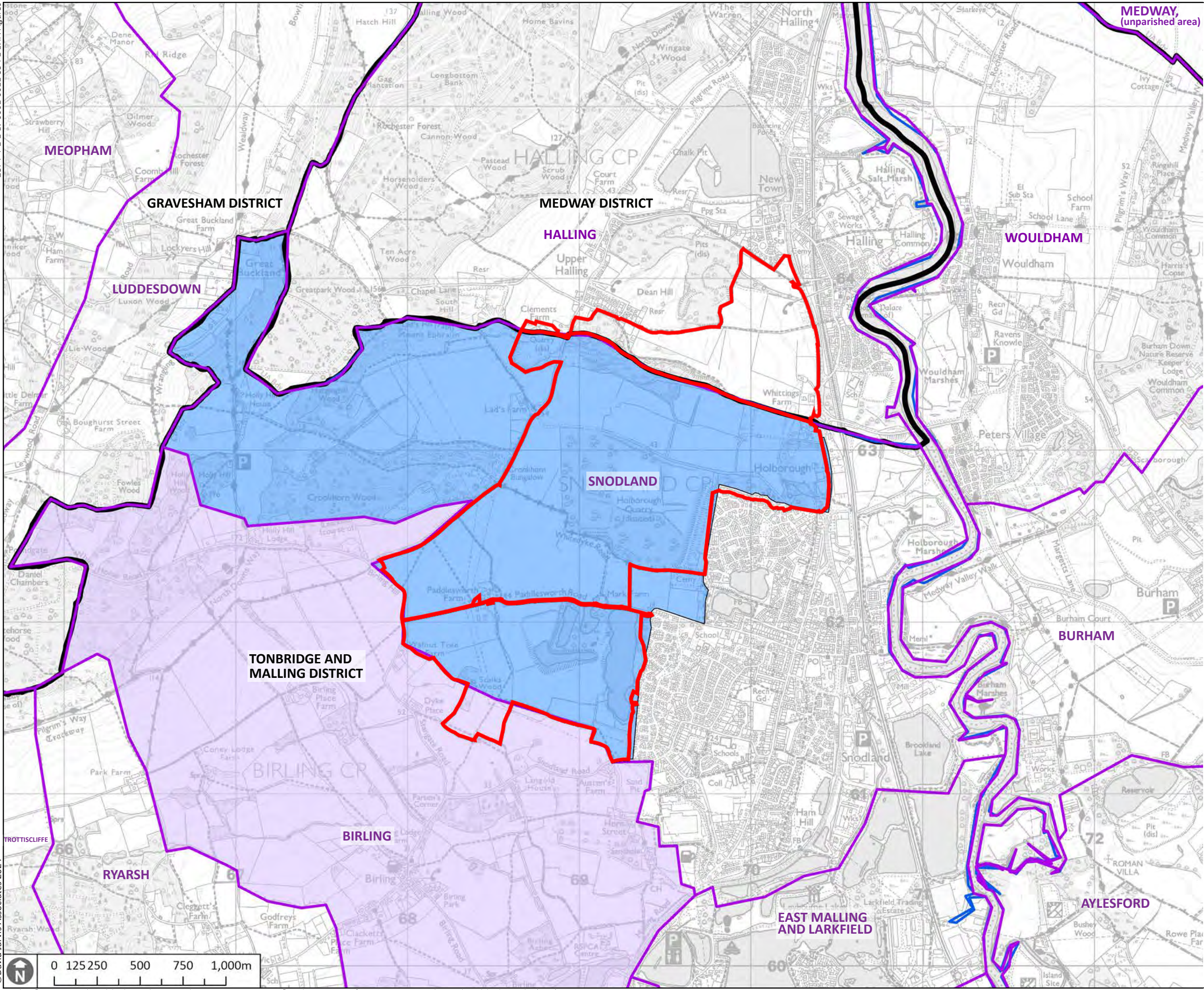
Version

S5-P1

OS data ©Crown copyright and database rights 2024 Ordnance Survey 0100031673. ©Local Government Information House Limited copyright and database rights (2024)

2874-4-1-1-LV-0001-0011-S5-P1 LVIA Figures

©David Jarvis Associates 2024



KEY

- Application Boundary
- County Boundary
- Parish Boundary
- District / Borough Boundary

Tonbridge and Malling Green Belt Study (Sept. 2016)

- Snodland Study Area
- Birling Study Area

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

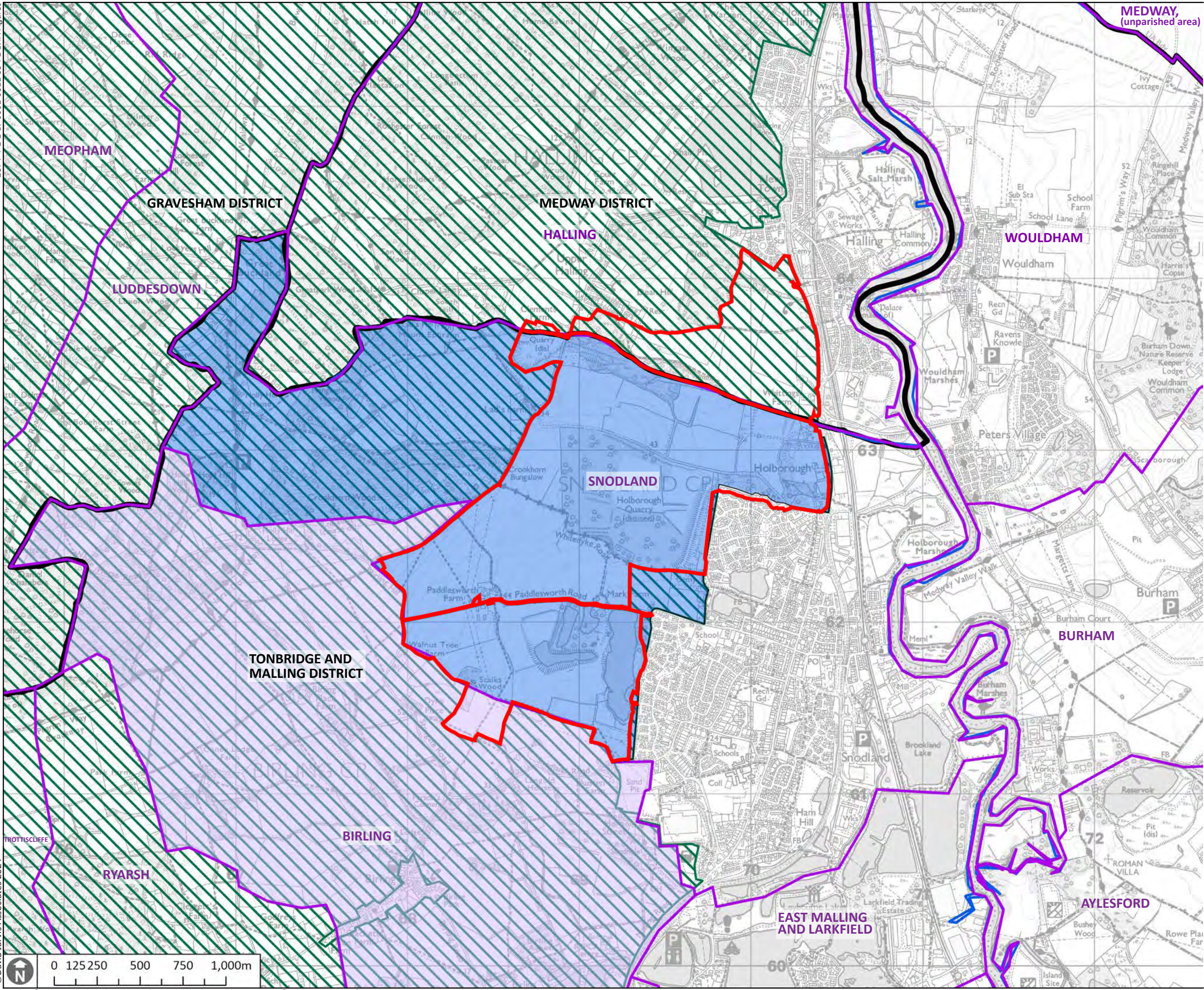
FIGURE 7 - SITE LOCATION PLAN (TMBC)

Scale	Sheet Size	Date
1:20,000	A3	SEP 2024

Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-1-1	LV-0007	S5-P1

2874-4-1-1-LV-0001-0011-S5-P1 LVIA Figures

© David Jarvis Associates 2024



KEY

- Application Boundary
- County Boundary
- Parish Boundary
- District / Borough Boundary
- Adjoining Green Belt

Tonbridge and Malling Green Belt Study (Sept. 2016)

- Snodland Study Area
- Birling Study Area

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenynson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

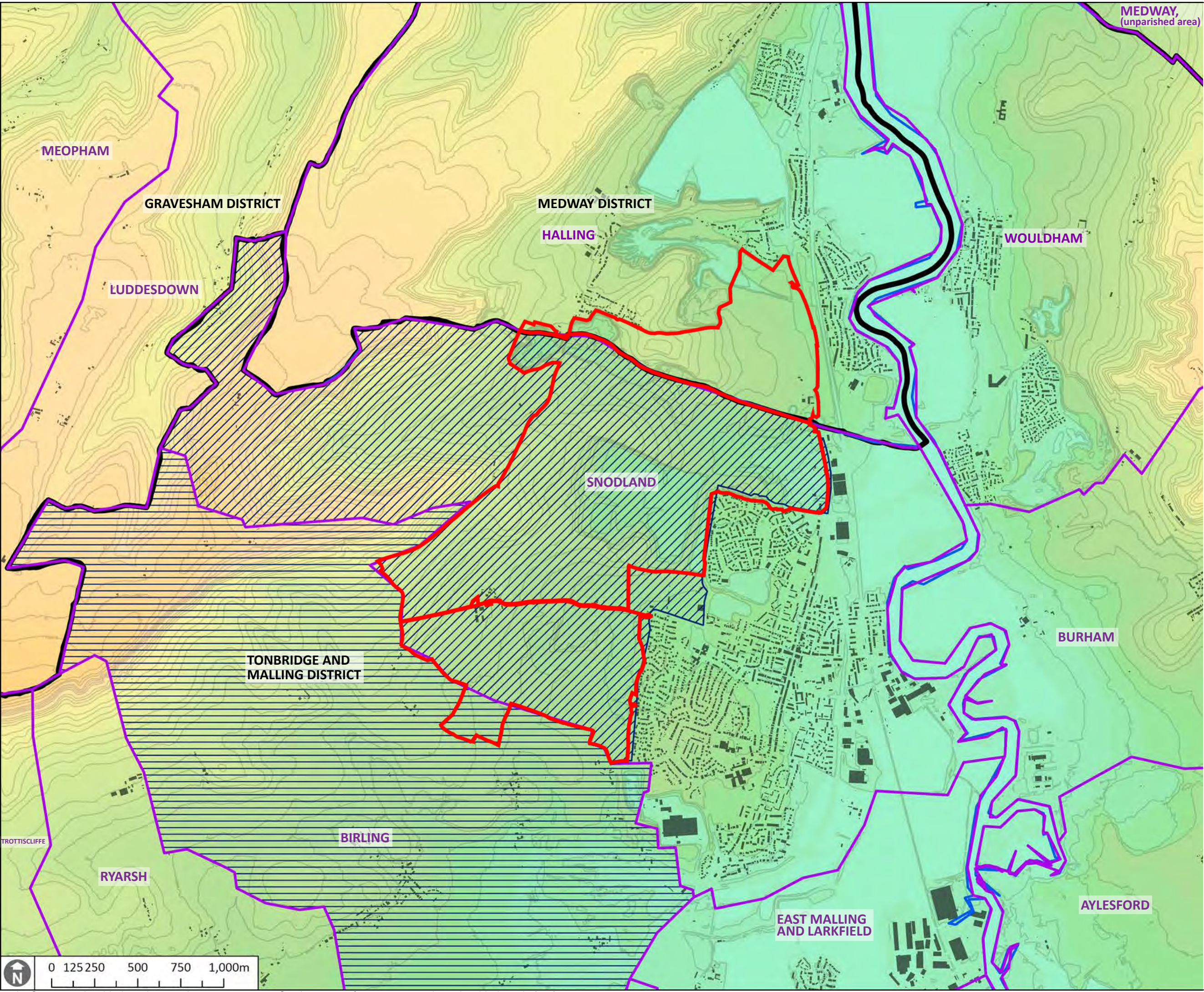
FIGURE 8 - GREENBELT PARCELS (TMBC)

Scale	Sheet Size	Date
1:20,000	A3	SEP 2024

Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-1-1	LV-0008	S5-P1

2874-4-1-1-LV-0001-0011-S5-P1 LVIA Figures

©David Jarvis Associates 2024



KEY

- Application Boundary
- County Boundary
- Parish Boundary
- District / Borough Boundary

Tonbridge and Malling Green Belt Study (Sept. 2016)

- Snodland Study Area
- Birling Study Area

196m AOD

-3 AOD

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

FIGURE 9 - TOPOGRAPHICAL RELIEF (TMBC)

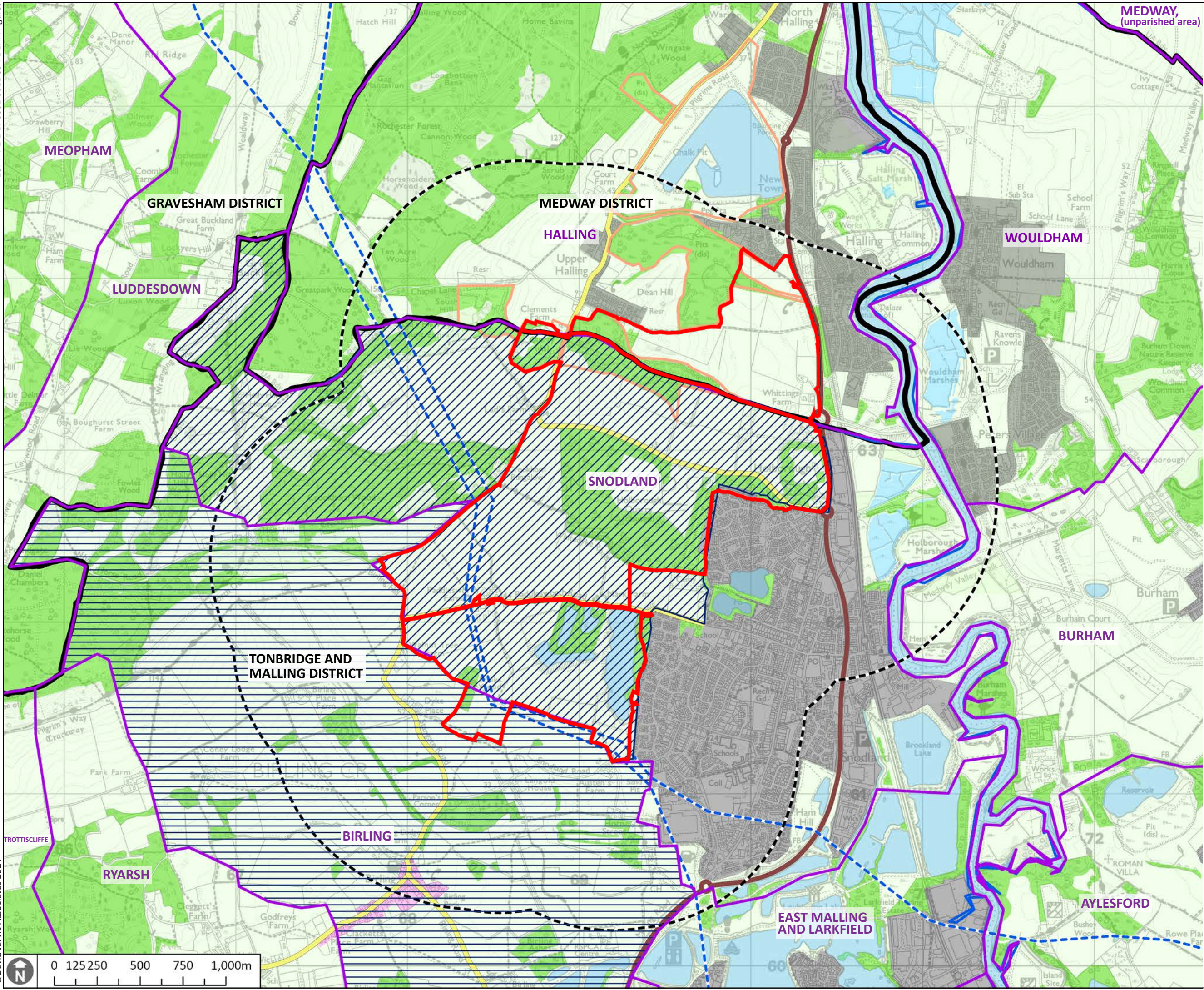
Scale	Sheet Size	Date	
1:20,000	A3	SEP 2024	
Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-1-1	LV-0009	S5-P1

0 125 250 500 750 1,000m

North Arrow

2874-4-1-1-LV-0001-0011-S5-P1 LVIA Figures

©David Jarvis Associates 2024



KEY

- Application Boundary
- County Boundary
- Parish Boundary
- District / Borough Boundary

Tonbridge and Malling Green Belt Study (Sept. 2016)

- Snodland Study Area
- Birling Study Area
- 1km Distance Range Ring
- Previously Quarried Land
- Minor Roads
- High Voltage Lines and Carriers
- Rivers & Waterbodies
- Woodland
- Agricultural Land
- Urban
- Rural Settlement – Birling

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenynson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

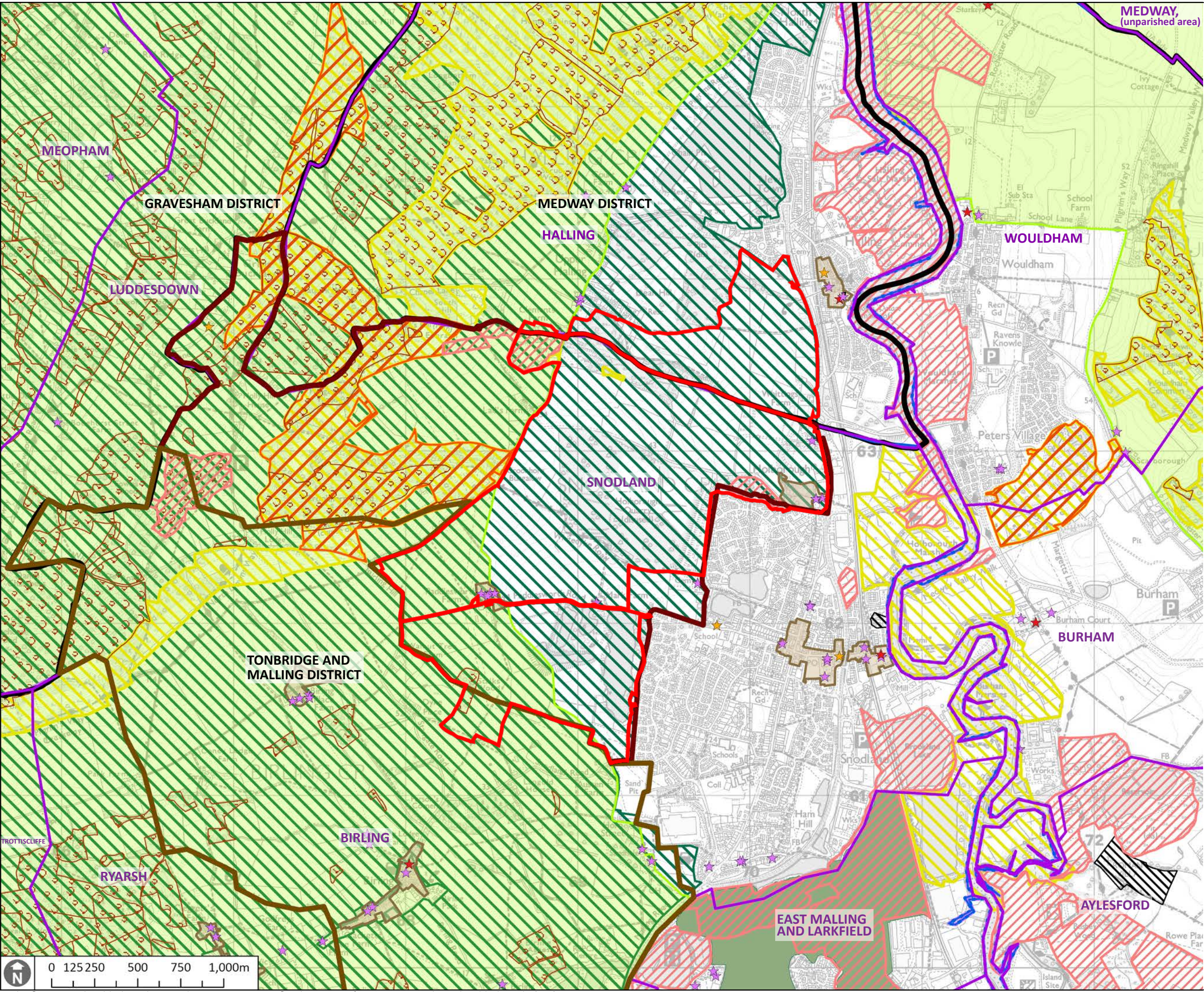
FIGURE 10 - LANDSCAPE FEATURES (TMBC)

Scale	Sheet Size	Date
1:20,000	A3	SEP 2024

Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-1-1	LV-0010	S5-P1

2874-4-1-1-LV-0001-0011-S5-P1 LVIA Figures

©David Jarvis Associates 2024



KEY

- Application Boundary
- County Boundary
- Parish Boundary
- District / Borough Boundary

Tonbridge and Malling Green Belt Study (Sept. 2016)

- Snodland Study Area
- Birling Study Area

Landscape Designations
© Historic England 2023

Listed Buildings

- Grade I
- Grade II*
- Grade II

Scheduled Ancient Monument

Landscape Designations
© Natural England 2023

- Ancient Woodland
- Ancient Replanted Woodland
- Special Areas of Conservation
- Sites of Special Scientific Interest
- Country Parks
- Areas of Outstanding Natural Beauty (AONB)

Local Authority Designations

- Conservation Areas
- Local Wildlife Sites
- Green Belt Boundaries

Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND

Project

HOLBOROUGH QUARRY

Drawing Title

FIGURE 11 - LANDSCAPE DESIGNATIONS (TMBC)

Scale	Sheet Size	Date
1:20,000	A3	SEP 2024

Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-1-1	LV-0011	S5-P1

TMBC Green Belt Study 2016 – Snodland Assessment (Extract)

Snodland (Appendix D)

Parcel/Area	Overview	Assessment
Snodland	<u>Check unrestricted sprawl:</u> The Green Belt does provide a clear boundary to the western side of the town that may otherwise perhaps be vulnerable.	<i>Performs well</i>
	<u>Prevent neighbouring towns from merging into one another:</u> The Green Belt has generally provided a clear edge to the settlement to the west. To the south and east (the latter of which is away from the Green Belt), other features including the A228 road network and Leybourne Lakes help prevent merging. The area is somewhat mixed therefore and thus has been categorised as performing moderately.	<i>Performs moderately</i>
	<u>Assist in safeguarding countryside from encroachment:</u> There has only been sporadic and mostly historic and/or farm based building in the Green Belt in this location such that the land generally retains a sense of openness.	<i>Performs well</i>
	<u>Preserve setting and special character of historic towns:</u> The historic core of Snodland and its Conservation Area is removed from the Green Belt designation and buffered by existing buildings. Views of the town's Conservation Area from within the Green Belt are restricted by other built form and the topography. Within the Green Belt smaller Conservation Areas can be found (Paddlesworth and Holborough Mill) where the setting is assisted by other	<i>Limited or no contribution</i>

Green Belt Study 2016

	designations including AONB and a Local Wildlife Site.	
	<p>Other Factors</p> <p><u>Surrounding Constraints/Other Designations:</u> Areas of AONB are found within the Green Belt to the west, alongside other landscape considerations including a Special Area of Conservation (SAC).</p> <p><u>Boundaries:</u> The Green Belt boundary is generally tight to the existing built-up area and road network. A small portion of Green Belt is located to the south of the Tesco depot which is removed somewhat from the wider expanse of Green Belt to the north-west.</p> <p><u>Openness:</u> Generally an open landscape but with sporadic existing buildings, waterbodies and tree belts/woodlands. Worked landscape evident.</p> <p><u>Future Commitments/Key Extant Planning Permissions:</u> Work to the north at Holborough Lakes is ongoing. To the south-west there is a protected site (Ham Hill).</p>	

Birling (Appendix K)

Parcel/Area	Overview	Assessment
Birling	<u>Check unrestricted sprawl:</u> The Green Belt boundary follows the built-up area, and this is clearly shown on the Development Plan Proposals Map. The Green Belt does therefore help contain the developed area and separate it from the open countryside. The AONB washes over the settlement.	<i>Performs well</i>
	<u>Prevent neighbouring towns from merging into one another:</u> Other settlements are some distance away with only sporadic development within the Green Belt.	<i>Performs moderately</i>
	<u>Assist in safeguarding countryside from encroachment:</u> The area retains a very rural feel with open fields; the Green Belt does form a connection to the wider countryside.	<i>Performs well</i>
	<u>Preserve setting and special character of historic towns:</u> Much of the settlement is designated as a Conservation Area. The Green Belt does play a role in providing a setting for this area, particularly given the smaller nature of the settlement and the fact the Conservation Area extends	<i>Performs moderately</i>

Green Belt Study 2016

	<p>into the Green Belt and there are views from footpaths. However the AONB also serves this function.</p>	
	<p>Other Factors</p> <p><u>Surrounding Constraints/Other Designations:</u> The area is also designated as AONB, and the village has a large Conservation Area.</p> <p><u>Boundaries:</u> The Green Belt boundary is considered to be clearly shown on the Development Plan Proposals Map and generally tightly drawn around the developed area.</p> <p><u>Openness:</u> A generally open landscape with open fields and a lack of urbanising features – a typical rural and Kentish landscape.</p> <p><u>Future Commitments/Key Extant Planning Permissions:</u> None identified.</p>	

Appendix 3

Holborough Quarry Landscape Appraisal and GI strategy (DJA November 2024)

HALLAM LAND AND TARMAC

HOLBOROUGH QUARRY

LANDSCAPE APPRAISAL AND GI STRATEGY

ISSUE: Monday, 18 November 2024

CLIENT Hallam Land and Tarmac

PROJECT Holborough Quarry

REPORT TITLE Landscape Appraisal and GI Strategy

DJA Reference: 2874-4-1-LV-0001-S5-P6 Holborough Quarry Landscape Appraisal and GI strategy
181124

Report Number: LV 0001

Revision: P6

Issue Date: Monday, 18 November 2024

REPORT REVISIONS

Revision	Date	Description	Prepared	Approved
P1	07/07/2020	Issue	PG	PG
P2	13/11/2020	Areas AE-AH added	PG	PG
P3	03/05/2024	Updated baseline and photography	PG	PG
P4	09/10/2024	Minor amendments to client comments	PG	PG
P5	13/11/2024	Minor amendments to client comments	PG	PG
P6	18/11/2024	Minor amendments to client comments	PG	PG

CONTENTS:

1. INTRODUCTION	3
2. METHODOLOGY.....	4
3. LANDSCAPE CONTEXT	5
4. VISUAL CONTEXT	11
5. THEORETICAL VISIBILITY TESTING	12
6. AREAS OF PROPOSED DEVELOPMENT.....	13
7. GREEN INFRASTRUCTURE STRATEGY	14
8. CONCLUSIONS	18

Figures:

LV-0001.	Site Location
LV-0002.	Landscape Character
LV-0003.	Landscape Designations
LV-0004.	Public Rights of Way
LV-0005.	Representative Viewpoint Locations
LV-0006.	ZTV parcels
LV-0007.	ZTV Results – all parcels
LV-0008.	ZTV Results - proposed development parcels
LV-0009.	Green Infrastructure Strategy

Appendices:

1. Landscape character assessments
2. Photographic field survey record
3. ZTV Results

1. INTRODUCTION

- 1.1 This report has been prepared by David Jarvis Associates Limited, chartered landscape architects and town planning consultants, on behalf of Hallam Land who are working in partnership with the landowners Tarmac and Aggregate Industries.

Scope

- 1.2 The purpose of this landscape appraisal is to identify the landscape character across the site and key viewpoints to help shape future masterplans.
- 1.3 The aim is the long-term promotion for mixed use residential development on land between the Kent Downs National Landscape designation and that which is immediately abutting the western edge of Snodland.

The Site

- 1.4 The site lies to the north west of Snodland and west of Halling and North Halling, Kent approximately 30km from central London. It forms part of a wider landholding.
- 1.5 It lies within the administrative areas of both Medway Council and Tonbridge and Malling Borough Council, see the red line at **Figure LV-0001**. Figure 1 also shows the area (see blue line) that is under the control of Tarmac but is outside of the area subject to the proposed development proposal that is being brought forwards by Hallam Land.
- 1.6 The site covers an area of approximately 371ha, the vast majority of which, 274ha, lies outside the Kent Down National Landscape (KDNL).
- 1.7 The site consists mainly of woodland, agricultural and arable land. A large area of the site benefits from an extant cement works mineral permission¹ that has been partially implemented.
- 1.8 The small settlement of Upper Halling is located north of the site.
- 1.9 The site is surrounded to the north, west and south by open countryside. The western tip of the site of the site lies within the KDNL. The site and much of the western side of the Medway valley is designated as Green Belt. There is a scattering of heritage and nature conservation designations within the site. Refer to **Figure LV-0003**.

¹ Planning application reference TM/98/785

2. METHODOLOGY

Methodology for undertaking the appraisal

- 2.1 The appraisal has been carried out in accordance with current guidance (GVLIA3, subsequent Statements of Clarification and Technical Guidance Note 06/19). It includes the following:
- A description of local landscape character.
 - An assessment of constraints, including landscape and visual susceptibility and sensitivity to change of the type proposed.
 - Zones of Theoretical Visibility mapping based on initial development parameters.
 - Photographic field survey using a 50mm Focal Length and Full Frame Sensor DSLR Camera to identify the predicted overall Zone of Significant Visibility, record key viewpoints (from which this and future development proposals may be assessed and monitored).
 - Recommendations identifying opportunities and potential mitigation.
- 2.2 A 3D computer model of the site and contextual landscape is based on OS data. The model was created in LSS and was used to assess visibility and assist with defining development parameters.

3. LANDSCAPE CONTEXT

Summary of the landscape context

- 3.1 The landscape character of the site and its wider context varies markedly. The site straddles two national and two local Landscape Character Areas. It extends westwards from the urban margins of Halling and Snodland to reach the lower slopes of the wooded upper scarp of the West Kent Downs.
- 3.2 The site sits within the valley floor and on the lower valley slopes and generally comprises areas of agricultural land, woodland and former mineral workings.
- 3.3 The condition of the landscape within the site ranges from good, associated with the western scarp slopes to poor, reflecting extensive areas of historic quarry working, a weak landscape structure, large scale arable farming and industrial development to the east.
- 3.4 The most attractive landscape feature locally is the well-integrated combination of mature woodland, arable fields and undulating upper scarp slopes coincident with KDNL designation. This lies largely outside of the site. The least attractive aspects are associated with large scale industrial and distribution buildings, electricity pylons and cables and remnant chalk quarry faces. These elements are found within the site.
- 3.5 The landscape forming most of the scarp beyond the west of the site is generally open and rural in nature. As such it is inherently highly sensitive to large scale development and particularly any that is not representative of the best local vernacular. Further east, within the site, in closer vicinity to Snodland and Halling, sensitivity levels drop and range from medium to negligible.
- 3.6 Areas in proximity to the site and that form part its context contain designated landscape, nature conservation, cultural heritage and recreational interest. The intrinsic sensitivity of these valued components ranges from very high to medium-low. The majority if these assets fall outside the site.
- 3.7 Scenic quality in the locality varies considerably. This ranges from relatively high-quality views occasionally available at the upper scarp slopes, generally found outside the site, to poor quality, often associated with the industrialised valley floor and a fragmented landscape character.

Published Landscape Character

- 3.8 A description of the landscape character of England was published by Natural England in 2014. The Character of England map and accompanying descriptions provide a national and regional framework for more detailed assessments carried out at a county, district or unitary authority level by local authorities and others. These in turn provide the background for assessment at the local or Parish scale, often carried out in relation to development and particularly in situations where the landscape is undergoing rapid change.
- 3.9 The landscape character context for the site is shown on **Figure LV-0002** Landscape Character Areas. Landscape character assessment of the site has been carried out at national, regional and district level

by Natural England², Kent County Council³, Gravesham Borough Council⁴ and Medway Council⁵. There is no published Landscape Character Assessment for Tonbridge and Malling Borough Council.

3.10 The landholding beyond the KDNL falls predominantly within:

- National Character Area 119 – ‘North Downs’ and Area 120 ‘Wealden Greensand’
- Kent County Council Landscape Character Areas ‘Medway, Western and Eastern Scarp’ and ‘Medway Valley Lower’
- KHNL LCA 4B Medway Valley
- Medway Council Landscape Character Area 39 ‘Halling Quarries’

3.11 The national descriptions provide only a very broad framework for the more detailed county level study. Consequently, the more detailed assessments are referenced for the purposes of this appraisal.

3.12 Summaries of the district character area descriptions are provided at **Appendix 1**. A summary is provided below:

Kent County Council Landscape Character Areas “Medway, Western and Eastern Scarp”

Characteristic Features

- *Gently undulating arable farmland. Sparse, remnant hedges leading up to wooded ridges.*
- *Open and wild on eastern slopes with wide views.*
- *Quarries.*

Summary of Analysis

Condition	Very Poor
<i>Pattern of elements:</i>	<i>Incoherent</i>
<i>Detracting features:</i>	<i>Many</i>
<i>Visual Unity:</i>	<i>Significantly Interrupted</i>
<i>Cultural integrity:</i>	<i>Poor</i>
<i>Ecological integrity:</i>	<i>Weak</i>
<i>Functional Integrity:</i>	<i>Very Weak</i>

Sensitivity	Low
<i>Distinctiveness:</i>	<i>Indistinct</i>
<i>Continuity:</i>	<i>Historic</i>
<i>Sense of Place:</i>	<i>Weak</i>
<i>Landform:</i>	<i>Insignificant</i>
<i>Extent of tree cover:</i>	<i>Open</i>
<i>Visibility:</i>	<i>Moderate</i>

² Natural England (2013) “National Character Area 119: North Downs” and Natural England (2014) “National Character Area 120 ‘Wealden Greensand’”

³ Jacobs Babbie on behalf of Kent County Council (2004) “Landscape Assessment of Kent”

⁴ Gravesham Borough Council (2009) “Gravesham Landscape Character Assessment”

⁵ Medway Council (2011) “Medway Landscape Character Assessment”

Summary of Actions

- *Create ecological interest within the farmland by diverse cropping and areas of less intensive cultivation.*
- *Create enclosure for urban areas using characteristic woodland*
- *Create coherent land patterns - define farmland, urban areas and small blocks of woodland*
- *Enhance existing historic and ancient features based on historic settlement, ferry points, and ancient highways"*

Kent County Council Landscape Character Areas "Medway Valley Lower"

Characteristic Features

- *Tidal river with well-developed meanders.*
- *Residual unimproved grasslands and reedbeds forming important areas for nature conservation.*
- *Well developed industrial mineral and urban sites particularly on the west bank.*

Summary of Analysis

Condition	Very Poor
<i>Pattern of elements:</i>	<i>Incoherent</i>
<i>Detracting features:</i>	<i>Many</i>
<i>Visual Unity:</i>	<i>Significantly Interrupted</i>
<i>Cultural integrity:</i>	<i>Variable</i>
<i>Ecological integrity:</i>	<i>Weak</i>
<i>Functional Integrity:</i>	<i>Weak</i>

Sensitivity	Moderate
<i>Distinctiveness:</i>	<i>Indistinct</i>
<i>Continuity:</i>	<i>Recent</i>
<i>Sense of Place:</i>	<i>Very Weak</i>
<i>Landform:</i>	<i>Apparent</i>
<i>Extent of tree cover:</i>	<i>Open</i>
<i>Visibility:</i>	<i>High</i>

Summary of Actions

- *Restore and create pasture and reed beds*
- *Use scrub and hedgerows to integrate built developments*
- *Gap up and maintain existing hedgerows*
- *Link existing hedgerows with new hedges*
- *Site new developments sensitively"*

Medway Council Landscape Character Area 39 “Halling Quarries”

Characteristics

- *Scarp floor with rolling arable fields, interspersed with small settlements, disused quarries, industrial heritage and Peter’s Pit development infrastructure works*
- *Heavily wooded disused pits fragment character but screen visual interruption*
- *Blue lake to south west of Halling Cement Works forms distinctive landscape feature; overhead pylons and cement works are detracting features*
- *Southern part of character area extends into Tonbridge and Malling*

Summary of Analysis

Condition	Moderate
<i>Pattern of elements:</i>	<i>Variable</i>
<i>Detracting features:</i>	<i>Some</i>
<i>Visual Unity:</i>	<i>Interrupted</i>
<i>Cultural integrity:</i>	<i>Moderate</i>
<i>Ecological integrity:</i>	<i>Variable</i>
<i>Functional Integrity:</i>	<i>Moderate</i>
Sensitivity	Moderate
<i>Distinctiveness:</i>	<i>Distinct</i>
<i>Continuity:</i>	<i>Historic</i>
<i>Sense of Place:</i>	<i>Moderate</i>
<i>Landform:</i>	<i>Apparent</i>
<i>Extent of tree cover:</i>	<i>Intermittent</i>
<i>Visibility:</i>	<i>Moderate</i>

Guidance

- *Seek to strengthen landscape character by active management of disused pits to maximise wildlife and recreational potential*
- *Enhance access through Cemex site; include for viewing areas and improved access around Blue Lake*
- *Use appropriate native planting to screen new development proposals from footpaths, roads, existing settlements and rural areas*
- *Ensure that new development proposals respect rural character of area and criteria associated with Green Belt designation”*

Local Character Assessment

- 3.13 A field survey carried out during March 2020 and 2023 as part of this appraisal confirmed the site is generally typical of the LCA descriptions. The site is variable in character, with significant influence from the historic mineral workings.

- 3.14 The quality of the landscape improves away from the river rising to the edge of the KDNL and the attractive wooded scarp.
- 3.15 The western edge of the site along the KDNL boundary appear quite rural and lack significant development. The lower slopes of the Kent Downs and the main body of the site are much more closely associated with the linear development along the valley floor and river, in particular Snodland and Halling, and feel more urbanised. This feeling of urbanisation in the wider area is increasing with ongoing development at Peters Village, and in the future with the development of Land at Eccles.
- 3.16 There is a long history of industrial and commercial development within the Medway Valley, which has resulted in the dynamic and varied landscape that exists today. The SLR review of quarrying activities reveals that a significant proportion of the site, @135ha or 36.8% of the total site area, has been quarried over the last 150 years. This long history of change and development in the valley is reinforced by the planning permission granted for the cement works at Holborough Quarry and the recently approved development at Eccles. This ongoing process of landscape change has informed the landscape character, and the change from mineral / industrial uses to residential development is entirely consistent with the development of the valley.
- 3.17 This ongoing change is recognised in the Valley of Visions Landscape Partnership Scheme document “The Medway Gap”.

“The river was more than just a means of transportation in the heyday of the valley’s industry. The sheer power of fast-flowing streams into the river meant paper making had been thriving on its banks since before the 17th century. Many of these small paper mills closed in the middle of the 19th century and the industry, like others in the area, became dominated by large-scale producers. In fact two very modern paper mills still exist in Snodland and New Hythe today.

The existing pockets of industry in the Medway Gap, while vital to its economy, are far less intrusive than in the past. For the first time in over a hundred years, cement isn’t made in this valley. It’s possible however that the coming years will see one of the largest cement works in Europe set up camp in the chalk fields of the Medway Gap once more.”

- 3.18 The guidance from both the Kent and Medway LCAs would support a comprehensive landscape scale improvement to the area, including a planned coherent patterns of land use including future development.

Kent Downs National Landscape

- 3.19 The KDNL is described in the Management Plan⁶ as “a nationally important landscape and one of the most enchanting parts of southern England. The AONB was designated in July 1968; it covers 878sq.km (326 sq. miles) stretching from the Surrey/Greater London border to the Strait of Dover. Aside from a small area within the London Borough of Bromley, the AONB lies wholly within the county of Kent and covers around 23% of the total land area of the county. It rises to an altitude of 250m above sea level at its highest point at Toy’s Hill south of Sevenoaks, and is crossed in three places by the river valleys of the Darent, the Medway and the Stour, all flowing northwards.”
- 3.20 The boundary of the Kent Downs AONB was drawn over 50 years ago. In that time the character of the Medway valley has changed significantly. Over time a variety of requests to extend the boundary have been submitted but the view of the Joint Advisory Committee has been to hold off from formally promoting boundary reviews until the process for extension has been simplified.

⁶ Kent Downs Area of Outstanding Natural Beauty Draft Management Plan 2021-2026

- 3.21 There are currently no plans for a formal boundary review by Natural England.

Landscape Value

- 3.22 Landscape value relates to the value or importance society attaches to a landscape or view, which expresses national or local consensus and because of its quality, special qualities, cultural associations or ecological status.
- 3.23 The local landscape context is shown on **Figure LV-0003** Landscape Designations.
- 3.24 The KDNL clips the south west corner of the site around Paddlesworth Farm, the remainder of the site is largely free of landscape related designations, with the exception of the a scattering of Listed Buildings close to the A228, a geological SSSI at Houlder and Monarch Hill Pits, Upper Halling and the Conservation Area and Local Wildlife Site at Holborough.
- 3.25 Green Belt which washes over the site.
- 3.26 There is a reasonably well-developed network of Public Rights of Way within the wider landholding, but within the site the network is poor, see **Figure LV-0004**. Outside the KDNL this network is reduced with many routes being largely east / west around the lower slopes of the scarp. The network would benefit from improvement, particularly in a north / south direction.
- 3.27 In summary, the site varies in landscape quality and value.
- 3.28 The landscape character across the main body of the site beyond the KDNL is generally quite weak, in poor condition and with scope for enhancement. On the western edges of the site within the KDNL the quality of the landscape condition and character are more robust.
- 3.29 A planned improvement to the landscape condition and structure, as part of a wider development masterplan, would assist in meeting the guidance and aspirations of the LCAs.

4. VISUAL CONTEXT

- 4.1 A photographic record of the site was taken in March and November 2020, and updated in 2023, refer to **Appendix 2**. The locations of the viewpoints can be found at **Figure LV-0005**.
- 4.2 As a consequence of the landform of the Medway Valley, the site is generally visible in the landscape from the north, east and south east.
- 4.3 There is a marked difference in visibility between the steeper wooded scarp slope of the KDNL, and the lower more gently rolling slopes of the lower scarp as it falls toward the river. The reduction in woodland cover on the lower slopes increases visibility along the valley and intervisibility with the eastern side of the valley, which also forms part of the KDNL.
- 4.4 Along the edge of the KDNL in the north of the landholding the landscape is smaller and more intimate in scale with correspondingly reduced longer distance views. Further south the fields are larger and more open with less woodland and tree cover.
- 4.5 The lower slopes are wooded in places, often associated with former mineral workings. Field boundaries are less well defined. There is scope for significant new areas of woodland to reinforce landscape character and to create a landscape framework for future development.

5. THEORETICAL VISIBILITY TESTING

- 5.1 Certain criteria were set to inform the theoretical visibility testing:
- Any land within the KDNL or subject to other significant environmental designations or constraints has been excluded; and
 - Matters such as access, gradient and utilities are not considered.
- 5.2 The remaining landholding was subdivided into 26 parcels (A-Z), see **Figure LV-0006**. These parcels reflect existing field boundaries, ridges and valley floors, and other constraints such as woodland areas, other pre-existing uses or nature conservation designations.
- 5.3 A 3d model of the Medway Valley was created covering an area of approximately 8x7km. Areas of significant woodland were added from the 1:25000 Ordnance Survey, to simulate visual cut off. These are modelled at 15m high.
- 5.4 Each parcel was added to the model and tested at 10m high, equivalent to 2-2.5 storey development.
- 5.5 The theoretical visibility of all the parcels combined was tested to demonstrate the cumulative effect, graded against the total number of test points potentially visible in the wider landscape. See **Figure LV-0007**.
- 5.6 The theoretical visibility of each parcel was also tested individually, see **Appendix 3**. These results show the relative level of visibility of each parcel, scored against the maximum number of test points visible in the wider landscape. The colour grading used in the cumulative test is not directly comparable with that used for the individual parcels.
- 5.7 There would be limited cumulative visibility with the consented development at Eccles, and only then from a limited number of VPs on the high ground to the east around Blue Bell Hill. The site would only ever be visible in context of the rest of Snodland / Halling.

6. AREAS OF PROPOSED DEVELOPMENT

- 6.1 It is clear from the modelling that the theoretical visibility of the parcels varies greatly. Cross valley views would be present in most cases, albeit at a significant distance.
- 6.2 Parcels A-H are widely visible as a consequence of the east facing sloping landform and limited woodland screening. Parcels A, B, C, and D and E (in part) would be provided as public open space to ensure a suitable separation from Halling and the KDNL.
- 6.3 Parcels F and G score reasonably highly in terms of the level of visibility, partly as a function of their size, but development here would be close to the A228, aligning with the existing pattern of development and settlements along this corridor. Further, these effects could be mitigated with appropriate woodland planting.
- 6.4 Parcel I abuts the KDNL and would be an area of public open space.
- 6.5 Parcels P, R, S and V-Z abut the KDNL and would be visible, not just from the KDNL but within the wider landscape.
- 6.6 The scope for these parcels to accommodate development will be determined by the masterplanning process, which will be underpinned by following good place making principles and the application of robust mitigation measures.
- 6.7 Parcel J, whilst quite visible, would form part of an area of growth comprising parcels J-N. This is the location where the cement works and chalk quarry could be developed. However, residential development here would continue the growth around Ladds Lane, including that at Holborough Lakes.
- 6.8 Parcel Q lies with Holborough Quarry and is ideally suited to development given its low levels of visibility. It is a natural extension to the Holborough Lakes development.
- 6.9 Parcels T and U are suitable for development only if Parcel Q comes forward.
- 6.10 Parcel Z is constrained to a degree by overhead power lines and pylons.
- 6.11 **Figure LV-0008** shows a ZTV of the proposed extent of development, comprising Parcels D-E (eastern part only) F-H, J-O, Q, P, R and S (only in parts), T-U, V, X (eastern part) and Y. This is directly comparable with the results on **Figure LV-0007**.
- 6.12 These parcels cover an area of approximately 145ha.
- 6.13 It is accepted that any proposed development will not be screened in its entirety, and that the visibility of built form and the treatment of the setting of the KDNL are key considerations in the formation of a development masterplan.
- 6.14 Whilst no development is proposed within the KDNL, with the possible exception of a small length of local access road from Snodland Road, the setting of the KDNL would be affected. The western edge of the site plays a crucial role in the provision of substantial landscape and visual mitigation. Further consideration must be given to new areas of planting / woodland within the site to help fragment the visual effect of built form when viewed from within the KDNL.
- 6.15 Significant landscape rehabilitation / connectivity opportunities arise from the development of the site and should be included in the masterplan.

7. GREEN INFRASTRUCTURE STRATEGY

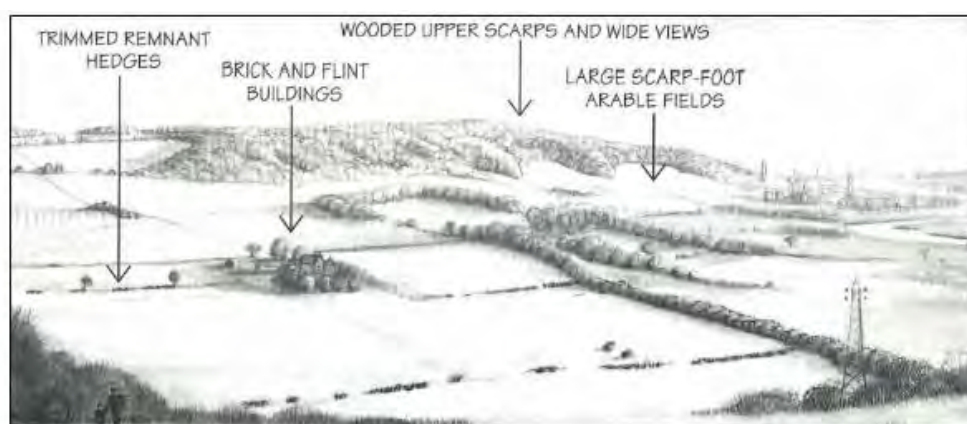
- 7.1 The Green Infrastructure Strategy illustrates a landscape structure within which the proposed development can sit.
- 7.2 The strategy is based on a review of the various relevant Landscape Character Areas, and the Kent Downs Management Plan, a review of the history of the landscape, an understanding of the sites topography and views and a site visit.

The Landscape Assessment of Kent 2004

- 7.3 The LCA's Proposed Landscape Actions (extract below) highlight opportunities to help shape the site and create a landscape-led masterplan:
- Create a landscape framework to provide an urban edge and peripheral enclosure to the arable fields and other farmland.
 - Create shaws or wide hedgerows as enclosure and to provide a network of semi-natural habitats.
 - Create small areas of regenerative woodland to provide intermittent tree cover and enhance the ecological interest of the area.
 - Create landscape features which enhance and recognise the ancient highway routes at the upper edge of the floodplain, ensuring that urban development on the waterfront is limited to specific historic nodes and that large open areas remain between the river and the highway.
 - Use woodland and wooded shaws to create an urban edge

Kent Downs AONB Landscape Character Assessment Update 2020

- 7.4 The illustration below is extracted from the Kent Downs LCA clearly demonstrating the typical Shaw and woodland planting in the area. This pattern has been used to influence locations of additional woodland planting.



Sketch of Medway Valley from 'The Kent Downs Landscape' (1995)

Kent Downs Area of Outstanding Natural Beauty Draft Management Plan 2021-2026

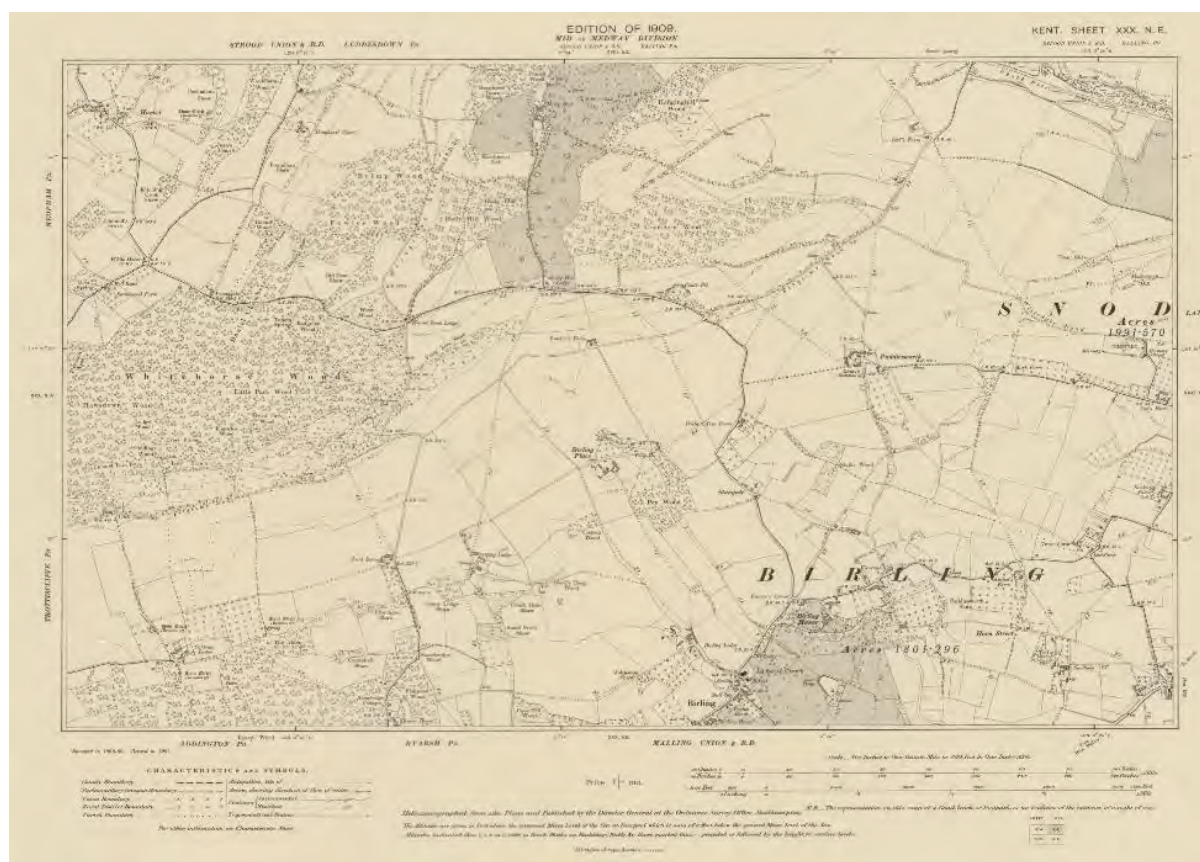
- 7.5 The management plan recognizes the pressures of development around the KDNL/AONB. It advocates for a landscape-led approach to development in these locations and a good understanding of the character area to guide any proposals. The below extracts highlights this:

"When the Kent Downs were confirmed as an AONB, the overall remarks of the designation committee were summarised as:

The starting point of achieving landscape led approach is an understanding of the site and its setting, the local landscape character, supporting this it is the landscape elements, context, special character and qualities, distinctiveness, sense of place, patterns and sensitivities; how it is perceived by people and for what reasons it is valued by people are key to the approach [...] A landscape led approach does not mean simply imposing an intervention within an existing landscape pattern. In a landscape led development, a site's landscape capacity will not be exceeded.

Tranquillity and remoteness
Setting
Design and materials
Mitigation"

National Library of Scotland: Kent Sheet XXX.NE Revised: 1907, Published: 1909



- 7.6 Historic maps such as the one shown above showing the western edge and some central areas of the site, revealed the presence of many footpath connections, several orchards across the site, some Shaws that have been lost.

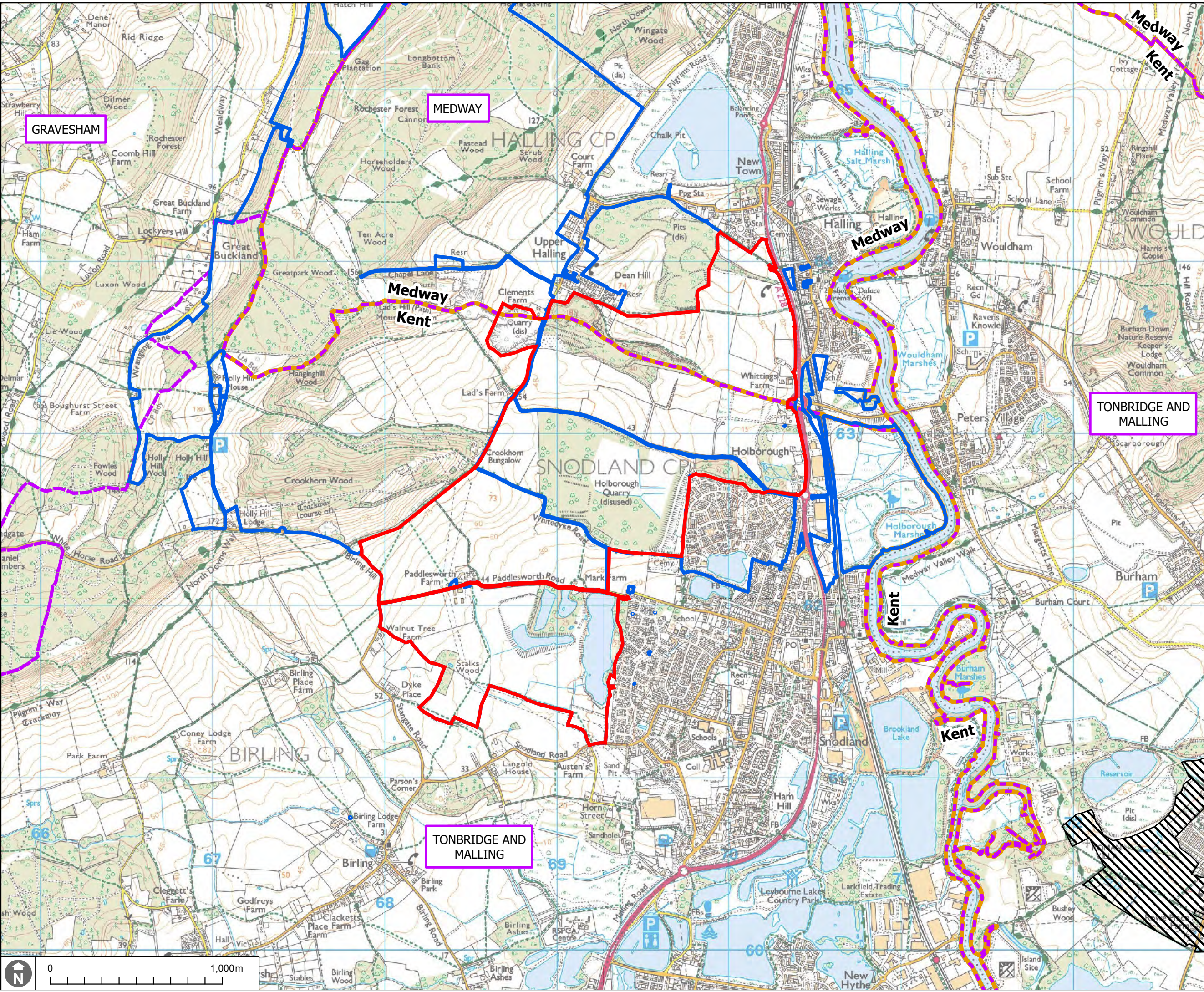
Proposed GI Strategy

- 7.7 The field and desk study and document review revealed the need for a more structured landscape.
- 7.8 The proposed GI strategy can be found at **Figure LV-0009**. The plan depicts the overarching strategy for the site, with the aim of providing a landscape structure for development to sit within.
- 7.9 This strategy would deliver the landscape mitigation discussed at 6.6 and could include such measures as:
- providing areas of parkland and active green spaces forming parts of an integrated green buffer around the edge of the development;
 - keeping development away from the KDNL boundary;
 - providing areas of planting at the most sensitive edges to screen development;
 - provide planting within the development to help break up suburban grain;
 - and providing lower density development securing a suitable transition to the open parkland and creating visual permeability into the new neighbourhoods.
- 7.10 Areas of existing woodland are shown, with historic shaw / woodland areas.. New areas of planting are shown to connect the wooded scarp of the KDNL into the site and to form connections with the existing woodland areas.
- 7.11 A strong green corridor is proposed along the boundary with the KDNL to provide a buffer to the designated landscape. This provides the opportunity for significant areas of open space within the KDNL..
- 7.12 The network of green spaces should connect existing and historic features, giving the opportunity to celebrate the chalk faces where possible as an indicator of the history of development in the valley, a key characteristic of the area.
- 7.13 Areas of high ground within the site are shown and should be retained with open views over the valley. Many local views from within the valley and the KDNL are of a settled valley, and a dynamic developed landscape and not an unspoiled valley.
- 7.14 The network of footpaths has been eroded over the years, Paddlesworth being a particular focus for many routes that are now lost. These “lost” routes and others could be reinstated / reprovided to address the lack of north / south connectivity through the site.
- 7.15 Green corridors should be provided to reinforce the north / south movement and open up increased opportunities for pedestrians and cyclists to move between the Kent Downs and Medway Valley.
- 7.16 The proposed GI structure informs the GI & Heritage Strategy extract from the emerging prospectus and would:
- Create an interconnected green infrastructure network for people and wildlife.
 - Protect the KDNL edge by providing open space at the boundary as a buffer to any proposed development. This buffer also allows space to increase planting in a manner consistent with the LCA.

- Respond to the KDNL Management Plan to inform the areas of the site within the KDNL.
- Restrict development on most visible areas / highest points.
- Respond to the character area and where it would be appropriate to propose planting.
- Reflect historic maps which highlighted the various footpaths and Shaws that have disappeared overtime, and where these can be reinstated.
- Address the need for additional footpath connections, particularly north-south.

8. CONCLUSIONS

- 8.1 This appraisal concerns a site to the north west of Snodland and west of Halling, Kent. The site covers an area of approximately 371ha, the vast majority of which, 274ha, lies outside the Kent Down National Landscape (KDNL).
- 8.2 The site consists mainly of woodland, agricultural and arable land. A large part of the site benefits from a cement works mineral permission.
- 8.3 The landscape character of the site and wider landholding and its wider context varies markedly.
- 8.4 The western parts of the site along the KDNL boundary appear quite rural and lack significant development. The lower slopes across which most of the site is located are much more closely associated with the linear development along the valley floor and river, in particular Snodland and Halling, and feel more urbanised. This feeling of urbanisation within the valley is increasing with ongoing development at Peters Village, and in the future with the development of Land at Eccles.
- 8.5 There is a long history of industrial and commercial development within the Medway Valley, which has resulted in the dynamic and varied landscape that exists today. This long history of change and development in the valley is reinforced by the planning permission granted for the cement works at Holborough Quarry and the recently approved development at Eccles.
- 8.6 As a consequence of the landform of the Medway Valley, the site is generally visible in the landscape from the north, east and south east.
- 8.7 It is recommended that large scale development should be limited to the parcels identified with suitably placed woodland planting and green spaces as mitigation.
- 8.8 There would be limited cumulative visibility with the consented development at Eccles, and only then from a limited number of VPs on the high ground to the east around Blue Bell Hill. The site would only ever be visible in context of rest of Snodland / Halling.
- 8.9 It is accepted that any proposed development will not be screened in its entirety, and that the visibility of built form and the treatment of the setting of the KDNL are key considerations in the formation of a development masterplan.
- 8.10 The western edge of the site plays a crucial role in the provision of substantial landscape and visual mitigation. The GI strategy proposes new areas of planting / woodland within the site to help fragment the visual effect of built form when viewed from within the KDNL.
- 8.11 Significant landscape rehabilitation / connectivity opportunities arise from the development of the site and should be included in the masterplan.
- 8.12 Such planned improvement to the landscape condition and structure, as part of a wider development masterplan, would assist in meeting the guidance and aspirations of the LCAs.



KEY

- Site Boundary
- Land in the Applicant's Control
- County Boundaries
- District Borough Boundary
- Land at Eccles

Status
ISSUED FOR INFORMATION

DAVID JARVIS ASSOCIATES
DAVID JARVIS ASSOCIATES LIMITED
1 Tenyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

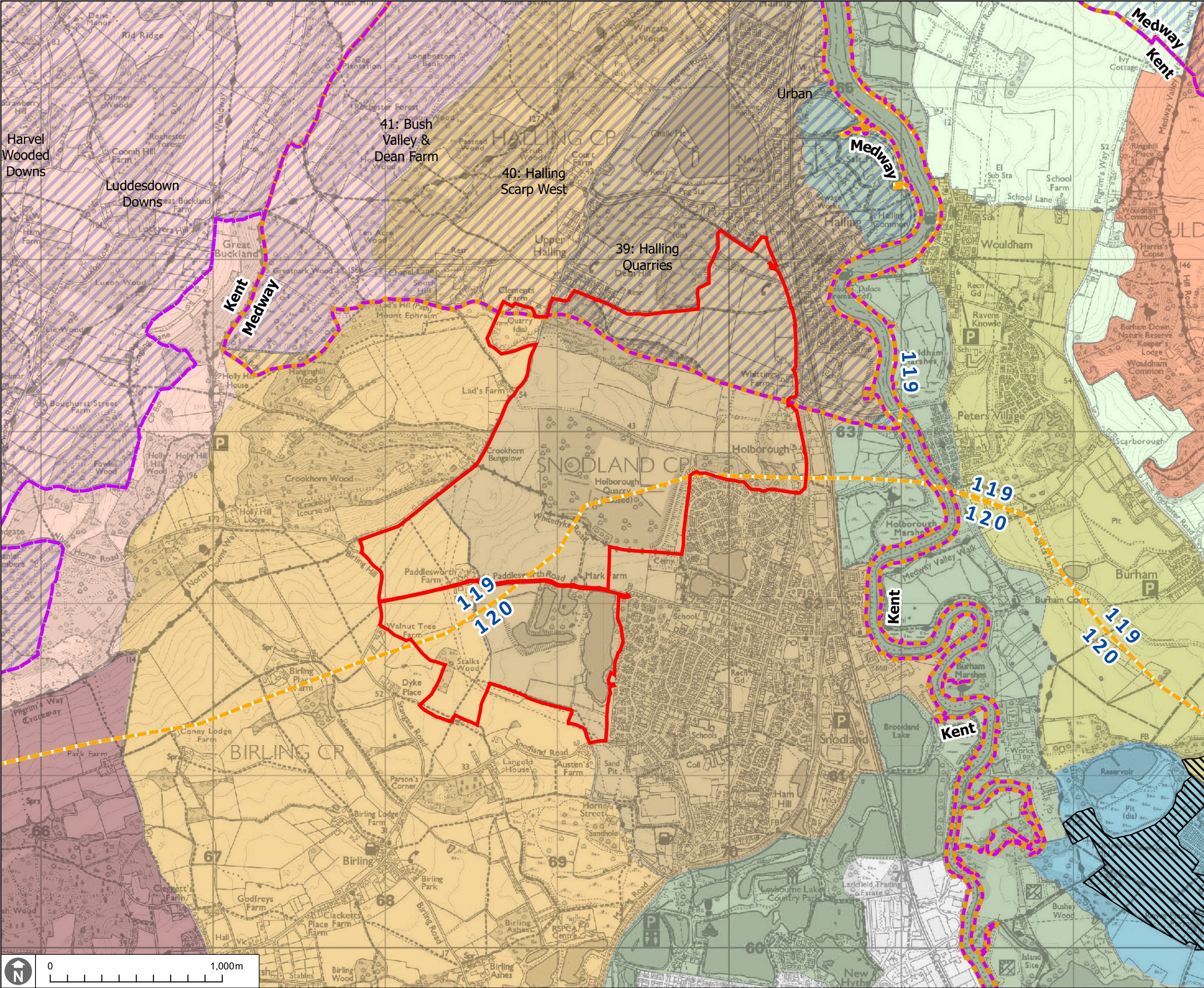
Client
HALLAM LAND AND TARMAC

Project
HOLBOROUGH QUARRY

Drawing Title
SITE LOCATION

Scale 1:20,000	Sheet Size A3	Date OCT 2024
Client Ref. -	Drawing Ref. 2874-4-4-4	Drawing No. LV-0001
		Version S4-P3

2874-4-4-4-LV-0001-0008-S4-P3 LVIA figures ©David Jarvis Associates 2024



KEY

- Site Boundary
- County Boundaries
- District Borough Boundary
- Land at Eccles

National Character Areas

- 119: North Downs (NE431)
- 120: Wealden Greensand (NE465)

Landscape Character Areas

Kent County Council Landscape Character Assessment

- Hollingbourne Vale
- Kemsing Vale: Kent Downs
- Kent Downs: Medway Eastern Scarp
- Kent Downs: Medway Western Scarp
- Luddesdown: Mid Kent Downs
- Medway Valley Lower
- Nashden Valley: Mid Kent Downs
- The Eastern Scarp: Medway
- The Western Scarp: Medway
- Urban

Medway District Landscape Character Areas

Status
ISSUED FOR INFORMATION

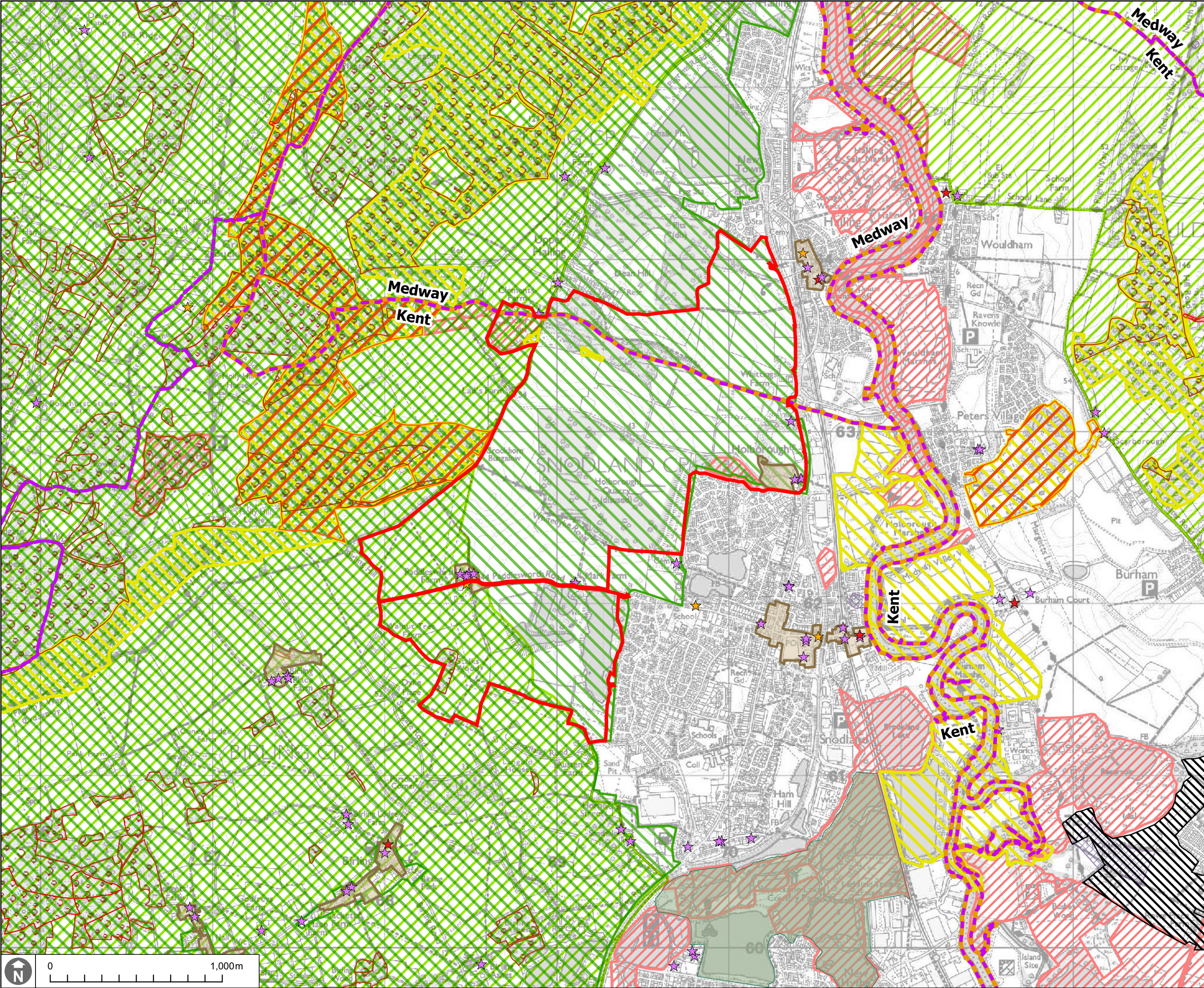
DAVID JARVIS ASSOCIATES
DAVID JARVIS ASSOCIATES LIMITED
1 Tenyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client
HALLAM LAND AND TARMAC

Project
HOLBOROUGH QUARRY

Drawing Title
LANDSCAPE CHARACTER

Scale 1:20,000	Sheet Size A3	Date OCT 2024
Client Ref. -	Drawing Ref. 2874-4-4-4	Drawing No. LV-0002
		Version S4-P3



KEY

Site Boundary

County Boundaries

District Borough Boundary

Land at Eccles

National Heritage List for England

Listed Buildings

I

II

II*

Scheduled Monuments

Protected Wreck Sites

Conservation Area

Natural England

Ancient & Semi-Natural Woodland

Ancient Replanted Woodland

Special Areas of Conservation

Sites of Special Scientific Interest

National Landscapes

Country Parks

Green Belt

County/Local Designations

Local Wildlife Sites

Status

ISSUED FOR INFORMATION

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED

1 Tennyson Street, Swindon, Wiltshire, SN1 5DT

t: 01793 612173

e: mail@davidjarvis.biz

w: www.davidjarvis.biz

Client

HALLAM LAND AND TARMAC

Project

HOLBOROUGH QUARRY

Drawing Title

LANDSCAPE VALUE

Scale

1:20,000

Sheet Size

A3

Date

OCT 2024

Client Ref.

-

Drawing Ref.

2874-4-4-4

Drawing No.

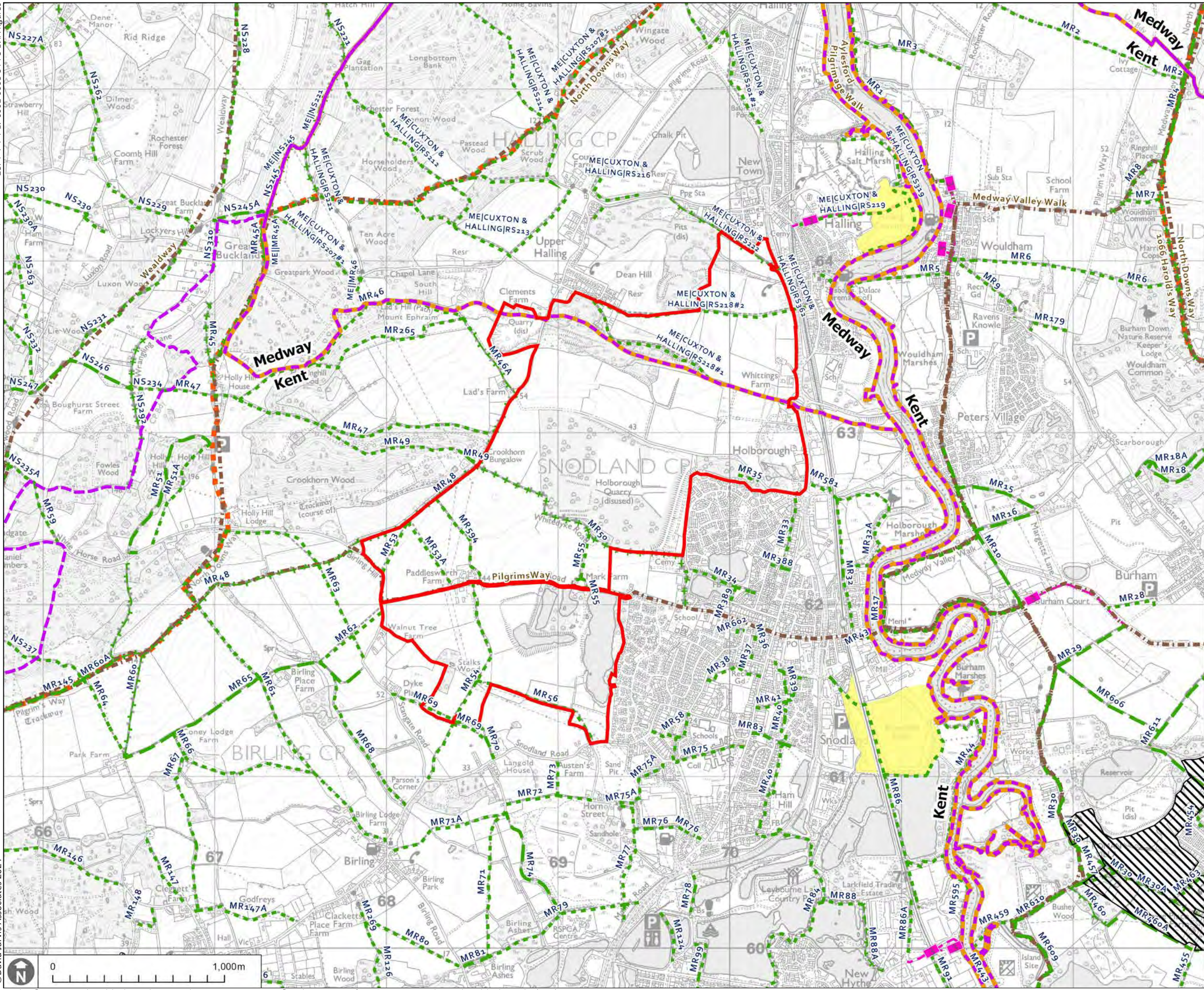
LV-0003

Version

S4-P3

2874-4-4-4-LV-0001-0008-S4-P3 LVIA figures

© David Jarvis Associates 2024



KEY

- Site Boundary
- County Boundaries
- District Borough Boundary
- Land at Eccles

PRoW

Kent County and Medway County Councils

- Byway Open to All Traffic
- Public Bridleway
- Public Footpath
- Restricted Byway
- Long Distance Footpaths

CRoW

- CRoW Access Land

Cycle Routes

- National Cycle Network Link
- National Trails (England) © Natural England

Status

ISSUED FOR INFORMATION

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND AND TARMAC

Project

HOLBOROUGH QUARRY

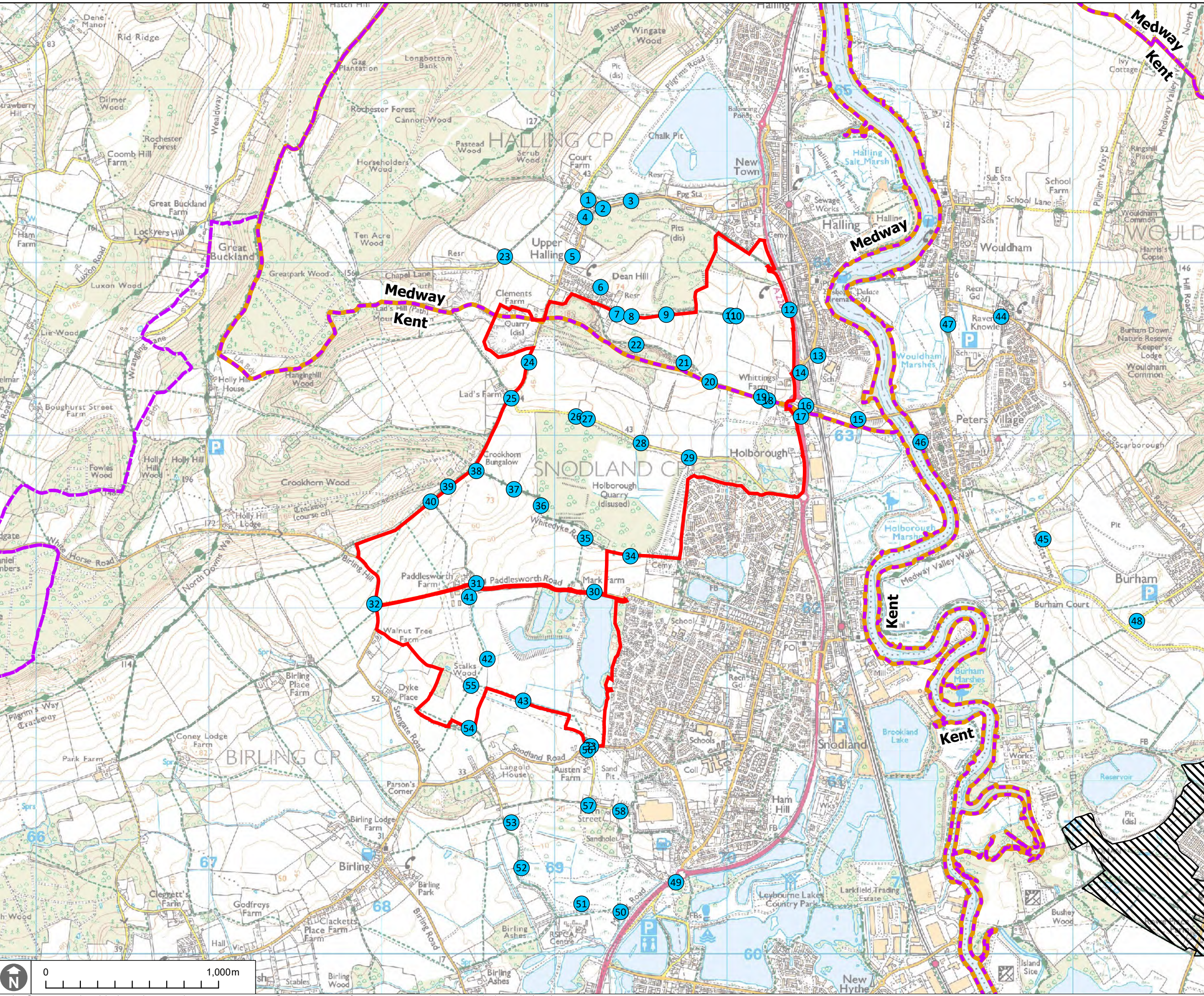
Drawing Title

PUBLIC RIGHTS OF WAY (PROW)

Scale	Sheet Size	Date	
1:20,000	A3	OCT 2024	
Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-4-4	LV-0004	S4-P3

2874-4-4-4-LV-0001-0008-S4-P3 LVIA figures

©David Jarvis Associates 2024



KEY

- Site Boundary
- County Boundaries
- District Borough Boundary
- Land at Eccles
- Field Survey Photographic Record Point

Status
ISSUED FOR INFORMATION

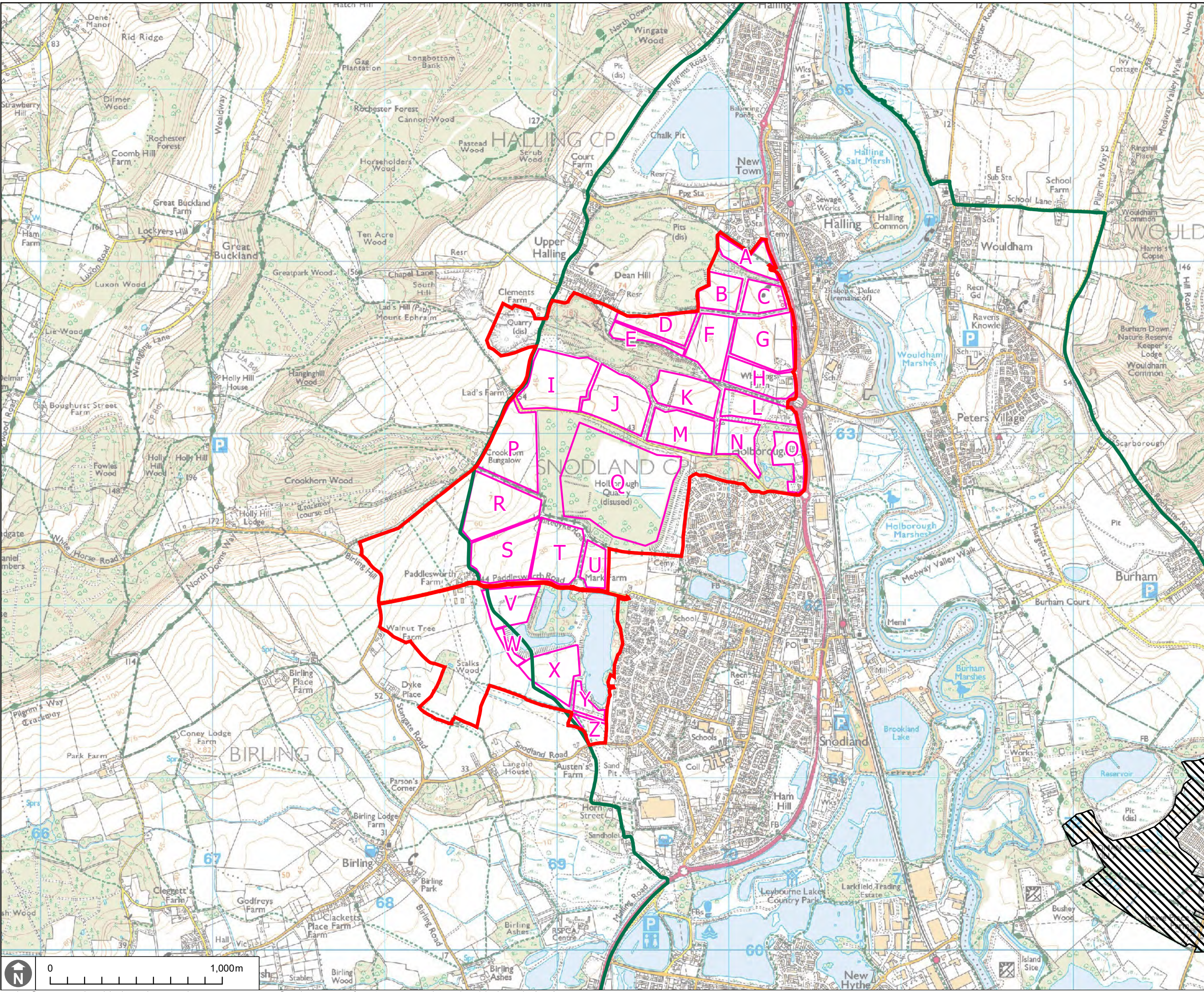
DAVID JARVIS ASSOCIATES
DAVID JARVIS ASSOCIATES LIMITED
1 Tenynson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client
HALLAM LAND AND TARMAC

Project
HOLBOROUGH QUARRY

Drawing Title
VIEWPOINT LOCATION

Scale 1:20,000	Sheet Size A3	Date OCT 2024
Client Ref. -	Drawing Ref. 2874-4-4-4	Drawing No. LV-0005
		Version S4-P3



KEY

- Site Boundary
- Land at Eccles
- National Landscapes
- Development Parcel and ID

Status

ISSUED FOR INFORMATION

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenynson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND AND TARMAC

Project

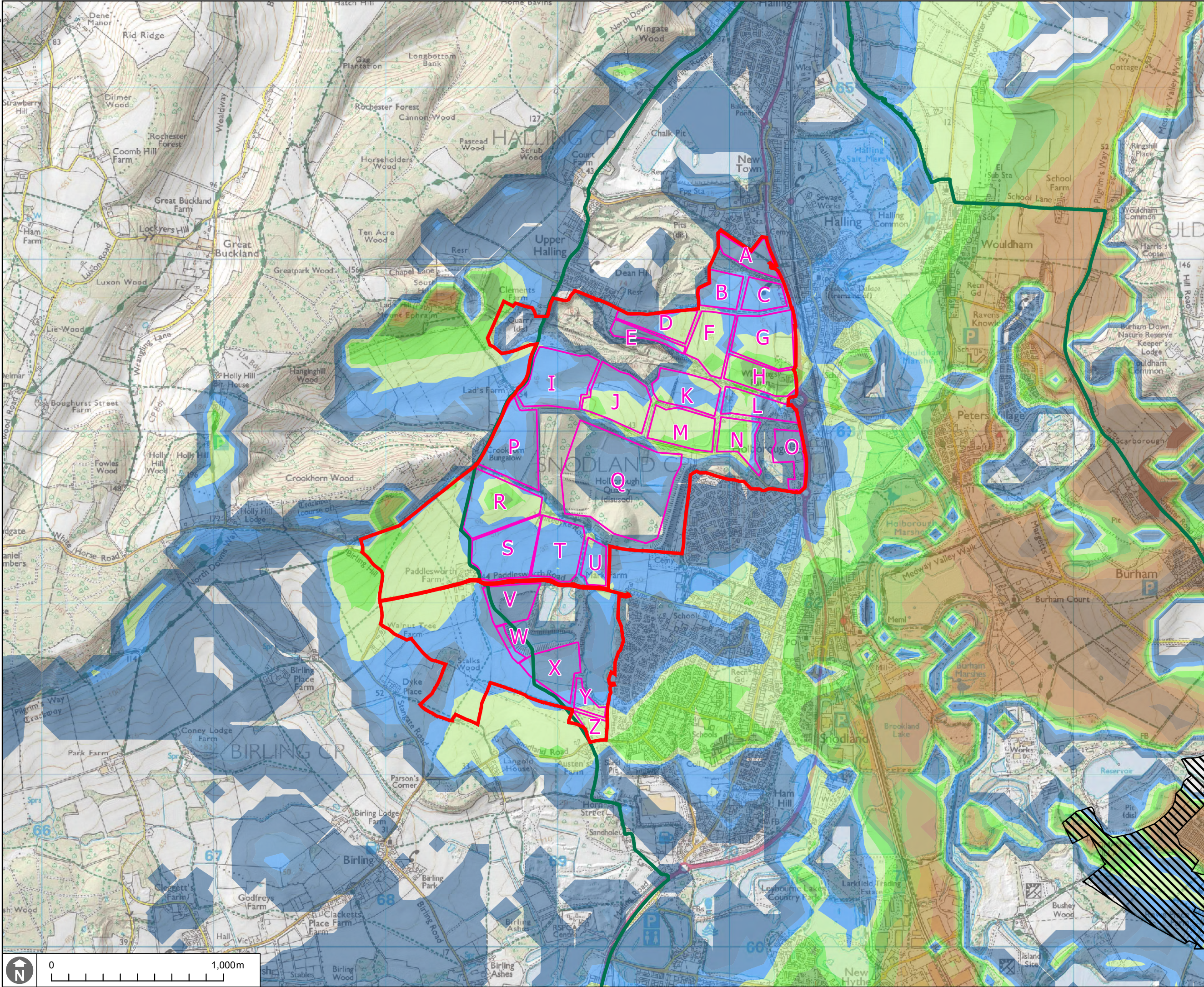
HOLBOROUGH QUARRY

Drawing Title

ZTV PARCELS

Scale	Sheet Size	Date
1:20,000	A3	OCT 2024

Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-4-4	LV-0006	S4-P3



KEY

- Site Boundary
- Land at Eccles
- National Landscapes
- Development Parcel and ID

Zone of Theoretical Visibility (ZTV)

Number of test points visible

- 50
- 100
- 150
- 200
- 250
- 300
- 350
- 400
- 450
- 500
- 550
- 600
- No visibility

Status

ISSUED FOR INFORMATION

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenyson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND AND TARMAC

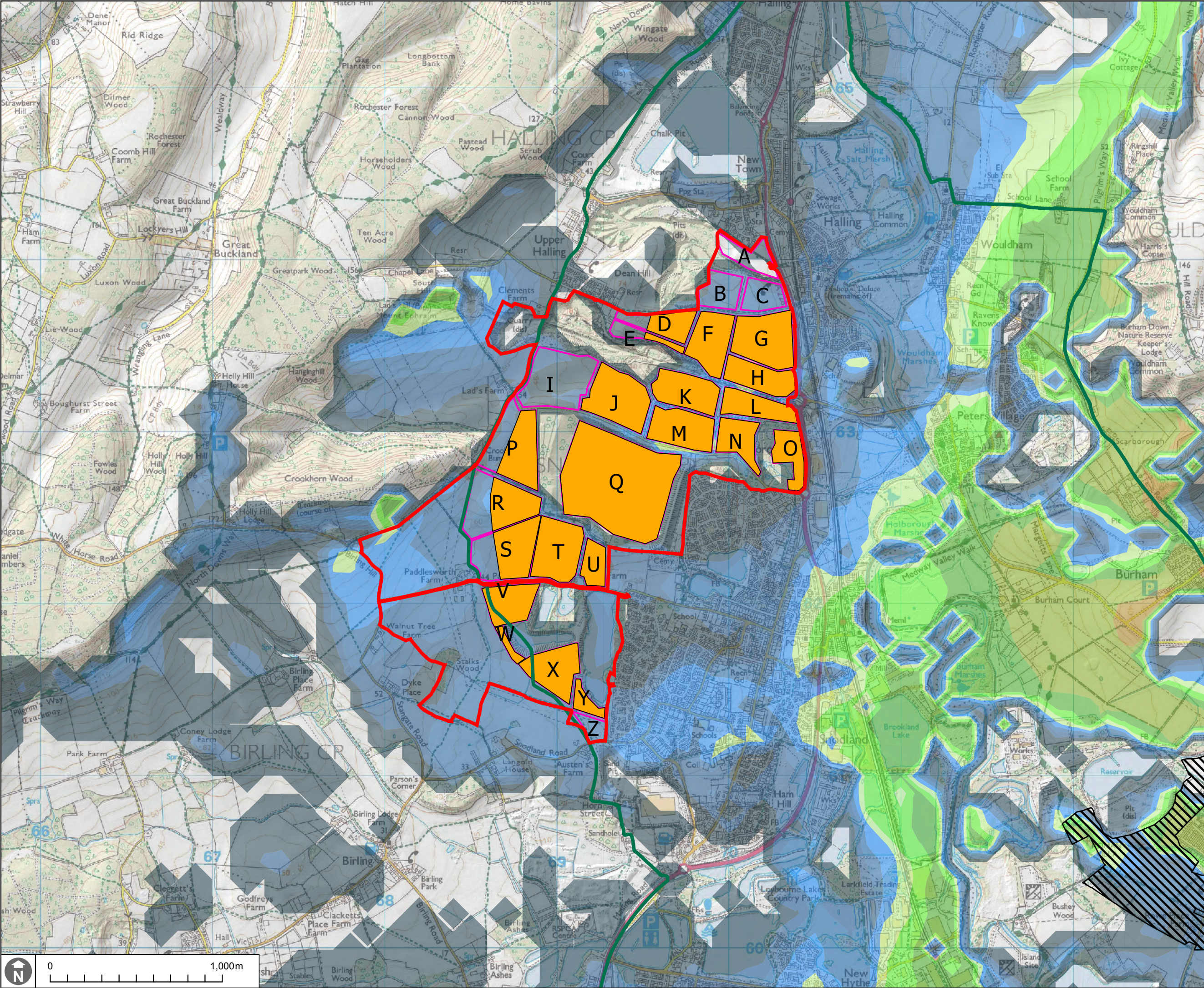
Project

HOLBOROUGH QUARRY

Drawing Title

ZTV RESULT - ALL PARCELS

Scale	Sheet Size	Date	
1:20,000	A3	OCT 2024	
Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-4-4	LV-0007	S4-P3



KEY

- Site Boundary
- Land at Eccles
- National Landscapes
- Proposed Development Parcels
- Development Parcel and ID

Zone of Theoretical Visibility (ZTV)

Number of points visible

- 50
- 100
- 150
- 200
- 250
- 300
- 350
- 400
- 450
- No visibility

Status

ISSUED FOR INFORMATION

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenynson Street, Swindon, Wiltshire, SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

HALLAM LAND AND TARMAC

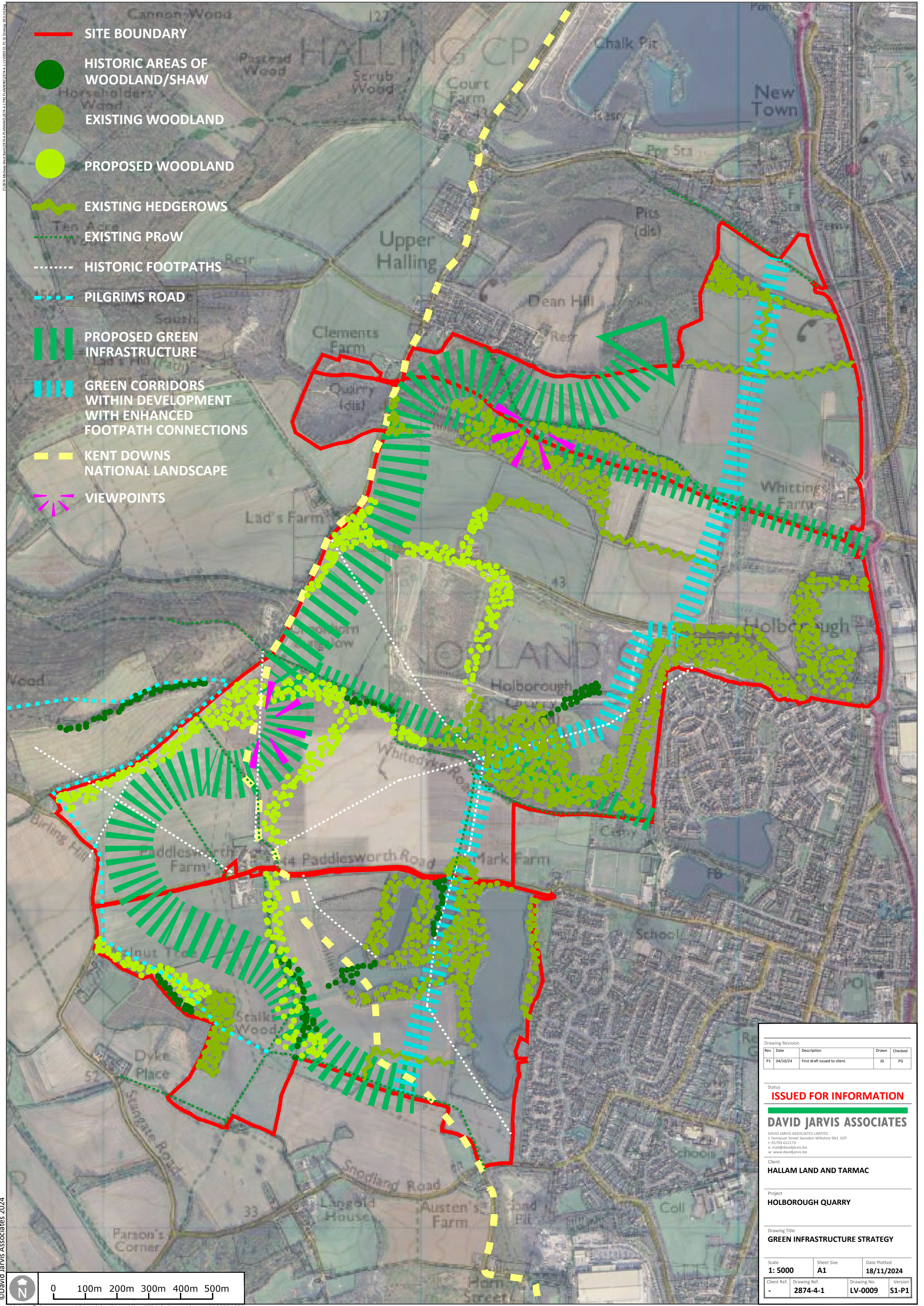
Project

HOLBOROUGH QUARRY

Drawing Title

**ZTV RESULT -
PROPOSED DEVELOPMENT PARCELS**

Scale	Sheet Size	Date	
1:20,000	A3	OCT 2024	
Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-4-4	LV-0008	S4-P3



- SITE BOUNDARY
- HISTORIC AREAS OF WOODLAND/SHAW
- EXISTING WOODLAND
- PROPOSED WOODLAND
- EXISTING HEDGEROWS
- - - EXISTING PROW
- - - HISTORIC FOOTPATHS
- - - PILGRIMS ROAD
- ▨ PROPOSED GREEN INFRASTRUCTURE
- ▨ GREEN CORRIDORS WITHIN DEVELOPMENT WITH ENHANCED FOOTPATH CONNECTIONS
- - - KENT DOWNS NATIONAL LANDSCAPE
- ★ VIEWPOINTS

Drawing Revision			
Rev.	Date	Description	Drawn / Checked
P1	04/10/24	First draft issued to client.	JG / PG

Status
ISSUED FOR INFORMATION

DAVID JARVIS ASSOCIATES
DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street Swindon Wiltshire SN1 5DT
t: 01793 612173
e: mail@djavidjavis.biz
w: www.davidjavis.biz

Client
HALLAM LAND AND TARMAC

Project
HOLBOROUGH QUARRY

Drawing Title
GREEN INFRASTRUCTURE STRATEGY

Scale		Sheet Size	Date Plotted
1: 5000		A1	18/11/2024
Client Ref.	Drawing Ref.	Drawing No.	Version
-	2874-4-1	LV-0009	S1-P1