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## **Agenda**

## Planning and Transportation Policy Working Group Meeting

Date: Thursday, 13 March 2025

Time 7.00 pm

Venue: Committee Room, Swale House, East Street, Sittingbourne, Kent, ME10 3HT

#### Membership:

Councillors Mike Baldock, Monique Bonney (Vice-Chair), Ann Cavanagh, Charles Gibson, Kieran Golding, Alastair Gould, James Hunt, Elliott Jayes, Julien Speed, Karen Watson, Mike Whiting and Tony Winckless.

Quorum = 3

Pages

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- Apologies for Absence
- Minutes

To approve the <u>Minutes</u> of the Meeting held on 17 September 2024 (Minute Nos. 243 – 251) and the <u>Minutes</u> of the Extraordinary Meeting held on 13 November 2024 (Minute Nos. 379 – 381) as correct records.

#### 4. Declarations of Interest

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The Chair will ask Members if they have any disclosable pecuniary interests (DPIs) or disclosable non-pecuniary interests (DNPIs) to declare in respect of items on the agenda. Members with a DPI in an item must leave the room for that item and may not participate in the debate or vote.

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Members who are in any doubt about interests, bias or predetermination should contact the monitoring officer for advice prior to the meeting.

- Local Plan Review Call for Sites 2024 and Housing and Economic 3 8
   Land Availability Assessment progress
- 6. Water Cycle Study: Update Report 9 16
- 7. Local Plan Review Swale Important Countryside Gaps Review 2024 17 90

#### Issued on Wednesday, 5 March 2025

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Chief Executive, Swale Borough Council, Swale House, East Street, Sittingbourne, Kent, ME10 3HT

Planning and Working Group	Transportation Policy
Meeting Date	13 <sup>th</sup> March 2025
Report Title	Local Plan Review – Call for sites and HELAA progress
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officers	Stuart Watson, Project Manager (Policy) Martin Ross, Principal Planning Policy Consultant
Classification	Open
Recommendations	1. That members note the update report on the Call for Sites 2024 and the progress being made on the Housing Economic Land Availability Assessment (HELAA).

#### 1. Introduction

1.1 As part of informing the options for land that can be considered for future development, and following requests from the Planning and Transportation Policy Working Group for defined development opportunities to be specifically explored, a new call for sites exercise requesting interested parties to submit land for consideration as part of the Council Local Plan Review was carried out from autumn 2024. This report describes the call for sites 2024 process and provides a high level summary of the progress being made on drafting the Council's Housing Economic Land Availability Assessment.

#### 2. Call for Sites 2024

- 2.1 The NPPF at paragraph 72 sets out that strategic policy making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. To help inform this objective the Council has carried out a number of a call for sites exercises.
- 2.2 At members' request a further call for sites exercise was carried out from autumn 2024, inviting landowners and other interested parties to make known land that could be considered for the Local Plan Review. In line with the member steer,, the exercise also made clear in its publicity that the council was looking to specifically increase site options within Sittingbourne and specific sites for Park Homes.
- 2.4 Historically, the Council has carried out a number of call for sites exercises, the last being in Spring 2022 when 34 sites were submitted for consideration. Due to members' steer to seek specific types of sites, new ways to publicise the exercise were carried out this time, in addition to existing methods. This has resulted in an uplift to in submissions to 101, nearly a threefold fold increase compared to 2022.

- 2.5 The highlights of the 2024 Call for Sites exercise are:
  - The exercise ran for six weeks between 3<sup>rd</sup> October and 14<sup>th</sup> November 2024;
  - In addition to established publicity approaches of advertising on the Council's website and social media channels and letters/emails to interested parties from the Policy contacts database, the following new approaches were used:
    - Town centre surveys were conducted by officers to identify vacant commercial units, followed by land registry searches so that letters could be sent to those property owners;
    - Targeted email were sent to the Council's business contacts from the Economic Development team;
    - o Targeted email were sent to charitable organisations with landholdings;
    - o Targeted emails were sent to local property auctioneers;
    - Targeted emails were sent to identified Park Homes companies (both local and national operators);
  - Nearly 3,000 communications consisting of letters and emails were sent out advertising the exercise.
  - Site submissions were directed towards a portal on the Council website. However, it was also possible to submit by email or letter submissions. Of the 101 submissions 93 were via the portal and 8 via email.
- 2.6 Whilst the 2024 Call for Sites exercise was a success in terms of levels of engagement and site submissions received, understanding the suitability and capacity of these sites for development is a work in progress. Of the 101 submissions, 34 failed the initial screening stage for the following reasons:
  - 6 submissions fell below the HELAA site development area size threshold;
  - 18 submissions were isolated in the countryside; and,
  - 10 were duplicates of previous submissions.
- 2.7 Of the 67 submissions being admitted to the HELAA process, 50 are for residential use, 14 for a mixed used and 3 for employment use.
- 2.8 Of the specific types of site the Council were seeking, only 5 of the 67 are within Sittingbourne urban area, and while this may be disappointing given the specific focus of the exercise following members request, all 5 are brownfield and are within the designated town center boundary, or close to it. These sites are:1
  - The Classic Cinema, High Street
  - 10-14 High Street
  - St Michaels House and Langs Bar, St Michaels Road
  - The Old Pumping Station, St Michaels Road
  - Sutton House, Old London Road

1

- 2.8 At this stage, early estimates are that, if all are deemed suitable, that around 150-200 dwellings could be achieved from these sites. This is taking account of the employment/retail/housing split on some of the sites and noting that no site is larger than 0.2ha. An established methodology will also need to be agreed upon for increasing site density in the most sustainable locations, once site assessments are completed.
- 2.10 With regard to Park Homes, there was some success with 9 submissions of Park Home sites or Park Homes mixed with market homes, including the Isle of Sheppey Strategic Caravan Sites, which is a adjacent collection of 8 caravan sites merged. These sites are:<sup>2</sup>
  - Home Farm, Breach Lane, Lower Halstow
  - Land on north side of Canterbury Lane, Upchurch (mixed)
  - Land on south side of Starborne, Oak Lane, Upchurch
  - Land north of Bricklands, Newington (mixed)
  - Syndale Park, London Road, Faversham (mixed)
  - Isle of Sheppey Strategic Caravan Sites (mixed)
  - Hollybush Farm Caravan Park, Oak Lane, Minster-on-Sea
  - Estuary View, Bell Farm Lane, Minster-on-Sea
  - Golden Leas Holiday Park, Bell Farm Lane, Minster-on-Sea
- 2.11 At this early stage, in the unlikely event that all sites are found suitable, we estimate that around 1000 park homes can be provided. Difficulties in making this estimate at this point include assessing the appropriate dwelling (market home) mix and how many (net) will be new on an existing caravan site, or an existing mixed park homes and caravan site. It is also difficult to establish currently which are holiday caravans and which are park homes in some cases, and several sites are currently undergoing change and construction, so it is difficult to monitor.
- 2.12 It should be noted that some submissions are very similar to previous submissions, that have not been categorized as direct resubmissions. For example, there are sites with addition parcels of land added or removed and boundary amendments that may include access strips, based on previous advice or comment from the Policy team.
- 2.13 The team have recently completed the site visits and are currently completing technical assessments, including comparing the sites to mapped constraints and interpreting site observations.
- 2.14 The sites are being considered across a number of topic areas including site sustainability, landscape and environmental impacts. The sites will be given an individual categorisation of suitable, potentially suitable (normally because site specific evidence based work will be needed to establish suitability where there is uncertainty) and unsuitable. There is then an overall suitability score, based on the worst outcome from the separate topic conclusions.

<sup>&</sup>lt;sup>2</sup> Sites shown are submissions only. Each site is being assessed as described in paragraphs 2.11-2.14 of the report

- 2.15 Alongside suitability, overall achievability and availability will be assessed. Achievability is generally assessed as economic viability. For example, there might be some heavily contaminated sites in sensitive groundwater areas where the proposals may not be economically viable, which will affect what can be achieved or delivered on site. Availability is whether the site is available now or within the plan period, for example, it might be available in years 6-10 if it is currently occupied by a building whose lease expires in 2030. However, with some sites, when it will become available may be uncertain, and subsequently will be considered unavailable.
- 2.16 If a site is considered available, suitable and achievable, it passes the HELAA assessment and will be considered alongside the other sites that have passed.
- 2.17 Once the assessments are complete, they will be reported to a future PTPWG meeting, initially outside the context of the growth options.

#### 3. Conclusion

- 3.1 The preparatory work for this exercise exceeded previous call for sites in terms of consultation reach and additional bespoke research, in response to members' requests. Whilst this has helped to achieve a larger number of site submissions, comparatively speaking, the Council have not received many brownfield/previously developed land submissions, including in Sittingbourne Town Centre.
- 3.2 The team are satisfied that they have taken all reasonable steps through the Call for Sites process in our search for more urban sites, particularly in Sittingbourne, at the current time.

#### 4. Proposals

4.1 That members note the update report on the Call for Sites 2024 and the progress being made on the Housing Economic Land Availability Assessment (HELAA).

#### 5. Alternative Options Considered and Rejected

5.1 The report is for information only so no alternatives are considered.

#### 6. Consultation Undertaken or Proposed

6.1 The consultation undertaken for the Call for Sites is set out above. Further consultation will take place during the Regulation 18 stage of the Local Plan consultation.

## 7. Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the following Corporate Plan action:
	A Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	No implications identified at this stage.
Legal, Statutory and Procurement	No implications identified at this stage.
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	No implications identified at this stage.
Health and Wellbeing	No implications identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.

## 8.0 Appendices

8.1 None

## 9. Background Documents

9.1 None

Planning and Transportation Policy Working Group		
Meeting Date	13 <sup>th</sup> March 2025	
Report Title	Water Cycle Study: Update Report	
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods	
Head of Service	Joanne Johnson, Head of Place	
Lead Officer	Anna Stonor, Principal Planner (Policy)	
Classification	Open	
Recommendations	To note the update	

#### 1 Purpose of Report and Executive Summary

- 1.1 This report provides an update on the Water Cycle Study, which forms part of the non-statutory evidence base for the Local Plan.
- 1.2 Due to delays in receiving, and absence of available data, and other issues discussed below, the Water Cycle Study is not yet finalised, however headline Phase 1 findings are set out in this report.

#### 2 Background

- 2.1 Requests for Quotations for a Joint Water Cycle Study (Swale Borough Council and Medway Council) were issued in October 2023. The aim of the study was to interrogate issues of water quality and resources in relation to sustainable future growth (to inform the evidence bases for the Swale and Medway Local Plans) and, for Swale Borough Council, to satisfy the Council Motion of October 2022, in particular:
  - 'the Planning and Transportation Policy Working Group be asked to consider commissioning an independent study into the sustainability of water supply to form part of the Infrastructure Delivery Plan for the Local Plan Review.'
  - 'that the Council notes that residents are deeply concerned about the regular untreated wastewater discharges into our local rivers, estuaries and seas and the cumulative impact this is having on wildlife and on human health'.
  - 'recognise this Council's obligation to protect its rivers, estuaries and seas, including from the cumulative impacts of pollution, in line with its local planning policy and the National Planning Policy Framework'.
  - 'recognise that there is clear evidence of deterioration of water quality due to cumulative impact of multiple sewage discharge events or 'sewage overload'.
  - 'ensure that an evidence base is compiled that assesses the cumulative impact of sewage discharge so that this is factored into decisions made in new iterations of the local plan, including the overall

- level of future development, if necessary, independently from the evidence produced by the utility providers'.
- 'seek to better understand the cumulative impact of wastewater discharge including untreated sewage on our local rivers, estuaries, wildlife and the health of our residents'.
- 'takes a lead on addressing this issue, working constructively with other agencies'
- 2.2 Only one quote was received, from Royal Haskoning DHV (RH DHV). The quotation sum met expectations and the three references received were all good, setting out that RH DHV either exceeded or met expectations.
- 2.3 The study was set out in three Phases:
  - Phase 1 to look at background data and evidence and the local situations, providing high level policy input.
  - Phase 2 to look at future development (broad locations and large potential sites) and potential impacts. This phase to involve modelling of impacts to feed into a broad analysis on limits and locations of development.
  - Phase 3 to look in detail at large sites, potential allocations and potential
    windfalls and give commentary on the feasibility and desirability of each
    site with reference to water quality and water resources. To look in more
    detail at limits and locations for development, as well as detailed advice on
    policy wording, the need for site-specific water cycle studies and specific
    opportunities for innovative approaches (eg creation of wetlands etc).
- 2.4 In late 2023/early 2024, RH DHV were appointed to carry out Phase 1 and 2 of the study and the project commenced in early 2024. A decision on the commissioning of Phase 3 was to be made at a later stage.
- 2.5 RH DHV have produced three iterations of the Phase 1 report to date (June, August and Oct/Nov 2024) all in draft and not yet in publishable form.
- 2.6 As it has been some time since this project was commenced it has been decided to give an update report on the headline findings of the Phase 1 study, as follows:

#### Generally

- I. Swale is classified as a highly water-stressed area according to the Environment Agency.
- II. Given its unique environmental landscape, including numerous designated conservation sites, Swale faces significant concerns regarding water stress and water quality, to protect those environments.

III. Increasing built infrastructure poses challenges to mitigate water stress and water quality pollution.

#### **Water Resources**

- I. Water supply in Swale is split 70% from groundwater and 30% from rivers. 90% of groundwater is abstracted from the chalk aquifer.
- II. An overall deficit of potable water supply is predicted in Kent by 2030.
- III. South East Water supplies potable water to the south and east of Swale. Water Resource Zone 8 (Ashford) supplies Faversham where the average consumption is 151.8 l/p/d, and for WRZ 6 (Maidstone) it is 139.9 l/p/d. The company plans to meet the Government's target of reduction in demand/supply to 110 l/p/d by 2050.
- IV. Southern Water also supplies potable water to western Swale and the Isle of Sheppey and aims to reduce water usage to 109 litres per person per day by 2040 (currently 134 litres per day).
- V. Water availability issues have been highlighted by events like the 2022 water shortage on the Isle of Sheppey.
- VI. Reductions to some abstraction licences may be needed by 2027, to protect the environment if the increased nutrient loading in the water is not controlled, and to mitigate the potential lack of rainfall due to climate change.

#### **Wastewater Management/Water Quality**

- I. Southern Water is the wastewater provider for all of Swale.
- II. The absence of updated discharge consent quality and DWF (Dry Weather Flow) headroom data from Southern Water restricts the conclusions on potential risks that the Water Study Cycle has been able to undertake (more on this later).
- III. Within Swale, Sittingbourne Wastewater Treatments Works currently exceeds capacity and requires urgent infrastructure investment.
- IV. Like most WFD water bodies UK wide, all WFD water bodies in Swale fail chemical status.
- V. The White Drain water body (near Boughton) is of particular concern regarding increased discharge due to an existing poor classification of its ecological status.
- VI. Southern Water has proposed investment into Swale of £550 million by 2050 to manage spills, mitigate flood risk, reduce pollution and improve overall network resilience.

#### **Policy Recommendations from RH DHV:**

I. Continued adoption of water efficiency standards.

- II. Close monitoring of water resource applications.
- III. Phasing of/restricting developments that could harm water quality/green infrastructure.
- IV. Swale and Medway Councils should liaise with Southern Water to determine whether it intends to upgrade WwTWs exceeding/close to capacity and identify the timescales over which any upgrades are likely to be implemented.
- V. The Councils may wish to consider the timing of any new developments in the catchments of WwTWs exceeding/close to capacity in the context of future upgrade programmes.
- VI. Discharges of substances such as ammonia and phosphate from WwTWs have been identified as contributing to pressures on the Ecological Status of surface water bodies in Swale such as Murston Lakes (classificed as poor for Phosphorous). The council may wish to *consider* proposed WwTW upgrades when proposing new development that could add to waste water loadings in these catchments.

#### To note:

- I. The WCS does not set out the likelihood of proposed investment coming to fruition.
- II. Language such as consider is included in the WCS, although it should be noted that it is not in the Council's power to, for example, progress WwTW upgrades.
- 2.7 Unfortunately, the project has not been straightforward, for reasons set out below, and as such there have been delays, additional consultant time and a final Phase 1 report which does not fully meet the original brief for the project nor, yet, the objectives of the Water Motion. The budget for Phase 1 (£6,529) has nearly all been spent, though the Phase 1 Report is not yet finalised.
- 2.8 The project has been delayed for the following reasons:
  - 1/ Delays obtaining, and absence of available data:
  - RH DHV first wrote to Southern Water on 26<sup>th</sup> February 2024, requesting information to inform the WCS. Some information was received on 26<sup>th</sup> April and subsequently, but Southern Water did not complete their data return until 30<sup>th</sup> July at which time they confirmed that they 'do not hold [all] the information you have requested...To confirm, Southern Water do not sample for the determinants [phosphorous and nitrogen] we don't have permits for so we will not have data on this'<sup>1</sup>. As such the study is missing expected discharge consent quality and dry weather flow headroom data.

<sup>&</sup>lt;sup>1</sup> From Southern Water's website (Frequently Asked Questions): Question: Why do some WWTWs not have a P or N permit? Answer: The substances and concentrations controlled by a permit are assessed

2/ The repeated delays in receiving, and subsequent issues with availability of data meant that the draft Phase 1 reports have been written with incomplete information. This has been frustrating for the consultant and Swale and Medway Councils and has meant that the yet unpublished Phase 1 report is incomplete in terms of the original brief.

#### 3/ Unresolved questions over modelling approach:

- In the initial tender return RH DHV proposed a modelling approach for Phases 2 and 3 called River Quality Planning tool (RQP). However, because the data around current nutrient load for Wastewater Treatment Works (WwTW) in Swale and Medway is so limited (which is essential for RQP modelling) the consultants proposed an alternative modelling approach called Load Standstill Modelling. This is a simpler approach, which would have provided limited results, but could be undertaken with the data that Southern Water had provided (which included Biochemical Oxygen Demand).
- Once officers received the proposal for this alternative approach, contact was made with the Environment Agency (EA) for their advice. Their initial/high level view (not based on a detailed assessment) was that RQP modelling was not the correct approach to use for WwTWs in transitional or coastal waters and that alternative approaches (examining plume modelling/mixing zones) should be undertaken.
- Following this initial advice officers asked the EA for a quotation for a detailed examination of the Water Cycle Study to date and further advice on the approach to modelling. A quotation was received in mid-December. As yet, officers have not progressed this work due to the additional cost and possibility that (due to lack of available data), worthwhile modelling might not be possible at all, or if so, could be very expensive. RH DHV have also provided a quotation for meeting with the EA, which has also not progressed to date for the same reasons.

#### 4/ Increased consultant, and other costs:

 Due to the issues outlined above, RH DHV have gone well beyond their initial human resource budget for Phase 1 of the project. As such, they have asked for further funds to complete the original scope, which are outside of budget. As mentioned earlier in this report, the budget for Phase 1 of this study is nearly all spent, and yet the project is not yet in publishable form. Officers are reluctant to spend more on this project (due to lack of data and uncertainty

and determined by the Environment Agency based on the water quality objectives of any given waterbody into which our assets discharge.

- about the most appropriate modelling approach) given concerns regarding value for money.
- It is also worth noting that due to this project taking much longer, and being much more complicated than anticipated, the time that the planning policy team has had to put into it is much greater than anticipated.

5/ Issues finalising report to standard required for publication:

- It has been noted above that officers have received three drafts of Phase 1 of the Water Cycle Study. Largely this is because of the delays and then absence of the necessary data from Southern Water, but there have also been repeated, yet to be fully addressed, comments, queries and suggested edits from Swale and Medway planning policy teams.
- 2.9 Furthermore, the Planning Policy team is currently in discussions with RH DHV about next steps to address the difficulties in undertaking Phase 2 and Phase 3. The Phase 2 and Phase 3 studies would have involved detailed modelling to determine whether the potential allocations proposed within the emerging Local Plans would be sustainable in terms of water quality and water resources. However, mainly due to the issues over lack of available data from Southern Water (making worthwhile modelling challenging), and increased costs associated with the project generally, progressing to further phases, with their inherent limitations under the current approach, might not yield the outcomes the motion intended.
- 2.10 Despite the many issues with this project, much useful information has been produced during the development of Phase 1 of the Water Cycle Study. This will be used to inform discussions with Southern Water and South East Water, the Environment Agency and Natural England going forward, and will inform the selection of allocations and the Infrastructure Delivery Plan.
- 2.11 A Water Cycle Study was commissioned to satisfy the Council's Water Motion, to inform the Swale and Medway Local Plans and because issues of water quality and water resources are important to the Councils and their residents. However, water cycle studies are not statutory pieces of evidence for Local Plan preparation and as such the implications, for the Local Plan, of not progressing this work to later phases are limited. Nevertheless, the issues of water quality and resources remain central to the development of the Local Plan and the Infrastructure Delivery Plan and will be progressed in dialogue with relevant authorities, organisations and statutory bodies.

#### 3 Proposals

3.1 The Committee is requested to note this update on the Water Cycle Study.

#### 4 Alternative Options Considered and Rejected

4.1 As this report is for information purposes, there are no alternatives.

#### 5 Consultation Undertaken or Proposed

5.1 The Water Cycle Study has been a joint study between Swale and Medway Councils. No external consultation has been undertaken to date, although the consultants have corresponded repeatedly with the relevant water companies and the local authorities have had correspondence with the Environment Agency about the approach to modelling, as set out above. Official consultation between Royal Haskoning DHV and the Environment Agency, Natural England and the Drainage Board was due at the beginning of Phase 2 of the Water Cycle Study, but as that stage has not been reached this has not taken place.

#### 6 Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the following Corporate Plan
	action:
	<ul> <li>A Local Plan with local needs and capacity at its heart</li> </ul>
Financial,	Resources for the Water Cycle Study form part of the Local Plan
Resource and	Budget.
Property	
Legal, Statutory	Water Cycle Studies are not statutory pieces of evidence for
and Procurement	Local Plan preparation and as such there are no implications
	identified at this stage.
Crimo and	<u> </u>
Crime and	No implications identified at this stage.
Disorder	
Environment and	No implications identified at this stage.
Climate/Ecological	
Emergency	
Health and	No implications identified at this stage.
Wellbeing	
Safeguarding of	No implications identified at this stage.
Children, Young	
People and	
Vulnerable Adults	
Risk Management	No implications identified at this stage.
and Health and	
Safety	

Equality and	No implications identified at this stage.
Diversity	
Privacy and Data	No implications identified at this stage.
Protection	

## 7 Appendices

No Appendices

## 8 Background Documents

Swale Borough Council Water Motion, October 2022

Planning and Transportation Policy Working Group			
Meeting Date	13 <sup>th</sup> March 2025		
Report Title	Local Plan Review – Swale Important Countryside Gaps Review 2024		
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods		
Head of Service	Joanne Johnson, Head of Place		
Lead Officers	Natalie Earl (Planning Manager (Policy)) and Stuart Watson Project Manager (Policy)		
Classification	Open		
Recommendations	1. That members are asked to note the findings of the Important Countryside Gaps Review 2024 and specifically the amendment of Countryside Gap SG4: Sittingbourne and the satellite village of Bobbing.		

#### 1. Purpose of Report and Executive Summary

- 1.1 As part of considering the local policy options and continuing to ensure the evidence base is up to date, a review of the important countryside gaps (Gaps) that were identified in 2014 and agreed as part of the adopted Local Plan Bearing Fruits was commissioned in the summer of 2024. This review (Appendix II) does not reconsider the additional gaps that were identified in the 2021 Important Countryside Gaps study due to the recent nature of that work.
- 1.2 The same methodology for this review has been used as the 2021 review to ensure consistency of approach, with assessment criteria updated where appropriate. For example, changes in mapping regions for policy criteria external to adopted Local Policy, and development that has subsequently been commenced and completed since the previous studies.
- 1.3 This Important Countryside Gaps review builds on the work of previous studies for the Council and provides an update that considers changes in both national policy and recent development. In the main the study proposes recommendations to gaps boundaries that are minimal to encompass recent development that has recently occurred.

## 2. Background Gaps Assessment Criteria

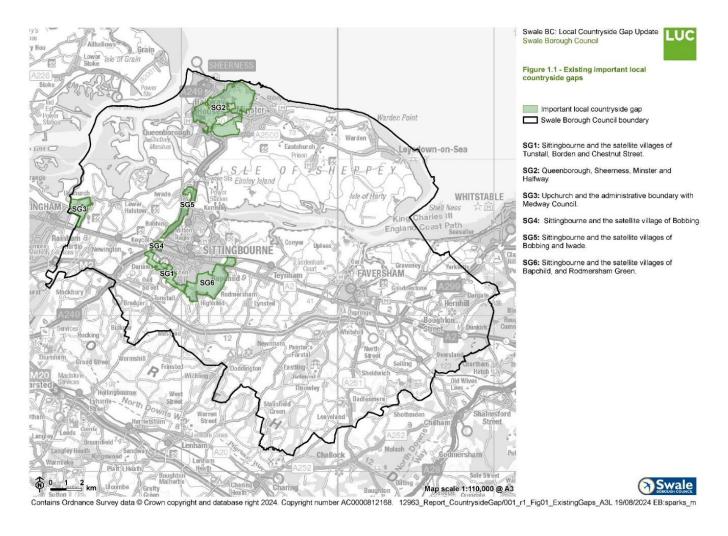
- 2.1 The Council's consideration for the Gaps in planning decision making is set out within the preamble to Policy DM25 "The separation of settlements Important Local Countryside Gaps" of Local Plan `Bearing Fruits (2017). The preamble sets out the purpose of the gaps to be:
  - maintain the separate identities and character of settlements by preventing their merging;
  - safeguard the open and undeveloped character of the areas;
  - prevent encroachment and piecemeal erosion by built development or changes to the rural open character; and,
  - influence decisions on the longer-term development of settlements through the preparation and review of Local Plans.
- 2.2 This review follows the same methodology developed by Land Use Consultants (LUC) in 2021 that informed new Important Local Countryside Gaps in the east of the borough. Whilst this study updates the existing Important Local Countryside Gaps in the west of the borough. This ensures all the gaps follow the same methodology and are defined using a consistent method and evidence base.
- 2.3 The Gaps review at paragraph 1.5 sets out the considerations for a purposeful countryside gap as:

The sense of separation provided between settlements relates to the character of the gap as well as its size. Small gaps can be effective in maintaining settlement separation if they have a rural character and provide separation, perhaps as a result of a distinct topography, presence of vegetation which limits inter-visibility between the settlements, or containing a distinct landscape feature.

On the other hand, large gaps may not be effective if they have a suburban character, lack vegetation or have clear inter-visibility between the settlements, and lack any other features that might provide a sense of separation such as a distinct topographical or landscape feature.

- 2.4 The Gaps in this review are split into 6 groupings as follows:
  - SG1: Sittingbourne and the satellite villages of Tunstall, Borden and Chestnut Street:
  - SG2: Queenborough, Sheerness, Minster and Halfway;
  - SG3: Upchurch and the administrative boundary with Medway Council;
  - SG4: Sittingbourne and the satellite village of Bobbing;
  - SG5: Sittingbourne and the satellite villages of Bobbing and Iwade; and
  - SG6: Sittingbourne and the satellite villages of Bapchild, and Rodmersham Green.

The groupings are set out in the map below:



2.5 There are currently no prescribed methods within national planning policy or guidance for assessing countryside gap designations. To address this, Gaps review assessment criteria have been developed from previous Swale studies, and best practice from Local Plan examinations. The table below is taken from the review and sets out the review's assessment criteria:

Criterion	Explanation	Indicators of a weak gap	Indicators of a strong gap
Existing settlement identity and pattern	Assess the extent to which the settlements or neighbourhoods that lie adjacent to the gap have an individual townscape character and identity that contributes to existing settlement pattern.	The individual townscape character, form and pattern of the settlements or neighbourhoods that lie adjacent to the gap are not distinct.	The individual townscape character, form and pattern of the settlement or neighbourhoods that lie adjacent to the gap are distinct.
		Loss or partial loss of the gap would not adversely affect the existing settlement pattern.	The presence of Conservation Areas, Listed Buildings are indicators of individual settlement character.
			The gap plays a role in settlement separation and pattern.
Landscape character	Assess the landscape character of the area between the settlements or neighbourhoods and any land use and landscape features within the gap that contribute to its character as open and undeveloped land.	There are significant manmade features or urban land uses that contribute to the developed character of the landscape.  The area lacks typical elements of rural vegetation e.g. farmland, hedges, trees etc, which contribute to an undeveloped character.  The area has a suburban character and residential areas outside defined settlement boundaries weaken the perception of the gap as 'countryside'.	Existing rural land uses contribute to the open and undeveloped 'countryside' character of the landscape, e.g. agriculture, horticulture, forestry.  The landscape has significant landscape features that contribute to its undeveloped character.  There is a low density or absence of development.
Visual character	Assess the visual character of the area between settlements and any views to settlements	Views to and from the settlement do not contribute positively to	Views to and from the settlement contribute positively to the visual character of the area

Criterion	Explanation	Indicators of a weak gap	Indicators of a strong gap
	or from settlements into the open countryside that contribute to that character and provide visual separation between settlements or neighbourhoods.	the visual character of the area.  There is a clear intervisibility between the settlements due to a lack of vegetation. Intervisibility alone does not indicate a weak gap and this criteria interplays with settlement identity and pattern e.g. intervisibility of contrasting settlement types may contribute to a stronger gap function.	(e.g. views mentioned in the Landscape Character Assessment/ Conservation Area appraisal).  There are limited/no views between settlements. Landscape elements, such as hills, ridges, and/or tall vegetation within the gap contribute to the sense of visual separation between the settlements.  Alternatively, where there is intervisibility or a narrow gap, the view shows clearly differing settlement character and identity e.g. between an expanding urban edge and distinct rural village.  Open vistas and long views may also indicate a strong gap where they are an important part of the character of the landscape.

#### Findings of the Gaps review

- 2.6 The Gaps review summaries and policy recommendations are shown below and the changes recommended are illustrated through existing and proposed maps contained within Appendix I.
- 2.7 Whilst most recommendations in the review are to retain the Gaps with minor sensical changes to their boundary to reflect recent development, the review also proposes removing SG4 due to it not being countryside in character from the impacts of the A249 along its western boundary.

**SG1:** It is recommended that the gap is largely retained at its current extent to avoid the coalescence of Sittingbourne, Chestnut Street, Borden and Tunstall.

The settlement boundary of Sittingbourne, and therefore the gap, should take into account the recent planning permission for housing development southwest of Sittingbourne. The gap should then be extended south to follow ZR147, ZR142 and ZR141 to retain a robust gap between Sittingbourne, Tunstall and Borden.

**SG2:** It is recommended that the gap is retained between Sheerness, Queenborough, and Minster to avoid the coalescence of these settlements. The main threat to coalescence is between Queenborough and Minster along the B2007 with the A249 forming the only real boundary between the two. One change to the boundary is required to exclude the Minster Park area off Ash Lane in the north-east of the gap as this is an established residential area that does not add to the rural countryside character of the gap.

**SG3:** It is recommended that the Gap is retained at its current extent to avoid coalescence of Upchurch and Rainham. A change to the boundary is required in the south-west due to a recent development on the edge of Rainham along Otterham Quay Lane.

A small amendment to the boundary should be made to allow for the permitted development on Otterham Quay Lane. The current proposal shows development restricted to the south of the site which allows the north to remain part of the gap.

**SG4:** It is recommended that this Gap is removed. Existing recreational and educational land uses to the east of the A249 and the strong boundary feature of the road itself reinforced by mature vegetation provide clear separation between the edge of Sittingbourne and Bobbing, which lies north of the railway line. The gap is dominated by the A249 which does not provide a 'countryside' character.

An Important Local Countryside Gap is not required to maintain the separate identities of the settlements, safeguard the open and undeveloped character or prevent encroachment of the rural open character.

**SG5:** It is recommended that the Gap is retained between Sittingbourne and Bobbing to avoid the coalescence of these settlements. There are rural land uses between Sheppey Way and the A249 which should be retained, although the A249 itself forms a strong physical feature to the settlement edge of Sittingbourne.

It is recommended that the gap covers land up to the new southern boundary of Iwade and that the gap is removed from the east of Iwade. New residential development east of Iwade will provide a country park between the settlement edge and the A249. The A249 is also a strong physical feature retaining separation between Iwade and the commercial edge of Sittingbourne.

**SG6:** It is recommended that the gap is retained at its current extent to avoid the coalescence of Sittingbourne and Bapchild. Although the main threat to coalescence is along the A2 corridor, the proposed gap extends north and south of the A2, to ensure that the settlements remain separate.

It is recommended that the gap is retained at its current extent to avoid the coalescence of Sittingbourne and Rodmersham Green. One small change in boundary is required to take into account the recent planning permission for housing development off Swanstree Avenue.

2.8 This review will go on to inform the Local Plan Review and be one of the evidence base considerations on where future development would be deemed inappropriate.

#### 3. Proposals

3.1 The proposal is that members are asked to note the findings of the Important Countryside Gaps Review 2024 and specifically the amendment of Countryside Gap SG4: Sittingbourne and the satellite village of Bobbing.

#### 4. Alternative Options Considered and Rejected

4.1 The option of not reviewing the Local Plan Review – Swale Important Countryside Gaps Review 2024 was considered and rejected. It is a requirement of national planning policy to consider the conservation and enhancement of the natural landscape when preparing a Local Plan, and the aim of the review is to provide an updated evidence base to assist in meeting this requirement.

#### 5. Consultation Undertaken or Proposed

5.1 This is an evidence base document and therefore not subject to consultation. Comments about the document, like with any other evidence base document, can be submitted through the consultation on the Regulation 18 Local Plan. In the next Reg 18 version of the Local Plan, the Council will be able to reflect the findings of this study and garner feedback.

## 6. Implications

Issue	Implications		
Corporate Plan	The proposals in the report align with the following Corporate Plan action:		
	A Local Plan with local needs and capacity at its heart.		
Financial, Resource and Property	No implications identified at this stage as this is within the agreed Local Plan budget.		
Legal, Statutory and Procurement	No implications identified at this stage.		
Crime and Disorder	No implications identified at this stage.		
Environment and Climate/Ecological Emergency	This proposal will assist with the conservation and enhancement of the natural landscape.		
Health and Wellbeing	No implications identified at this stage.		
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.		
Risk Management and Health and Safety	No implications identified at this stage.		
Equality and Diversity	No implications identified at this stage.		
Privacy and Data Protection	No implications identified at this stage.		

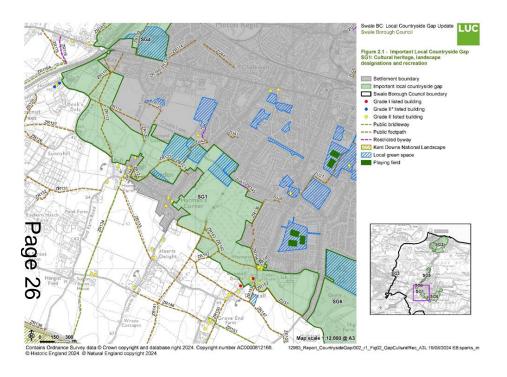
## 7.0 Appendices

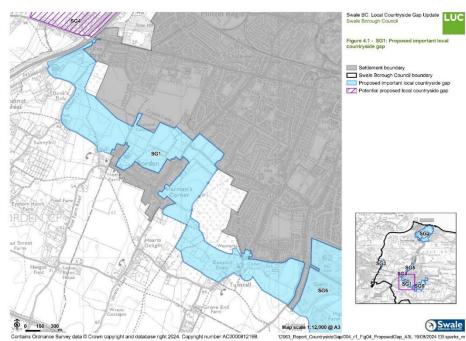
## 7.1 Appendix I: Existing and proposed Gap changes

- 7.2 Appendix II: Swale Important Countryside Gaps Review
- 8.0 Background Documents
- 8.1 None

## Appendix I: Existing and proposed Gap changes

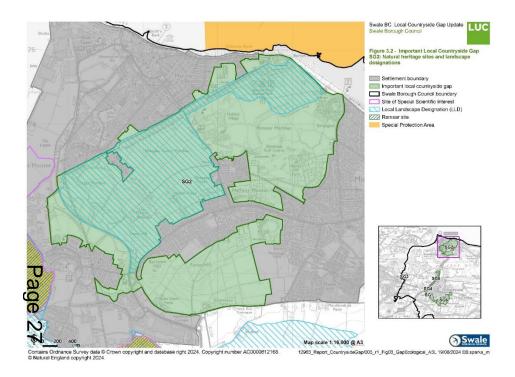
### SG1: Sittingbourne and the satellite villages of Tunstall, Borden and Chestnut Street



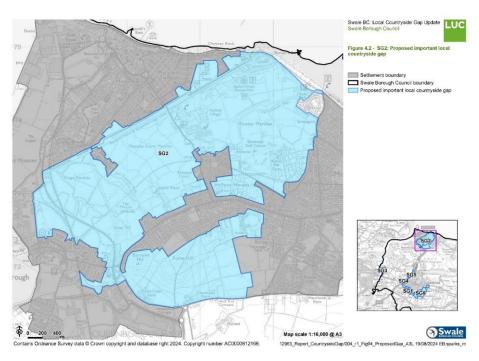


#### SG2: Queenborough, Sheerness, Minster and Halfway

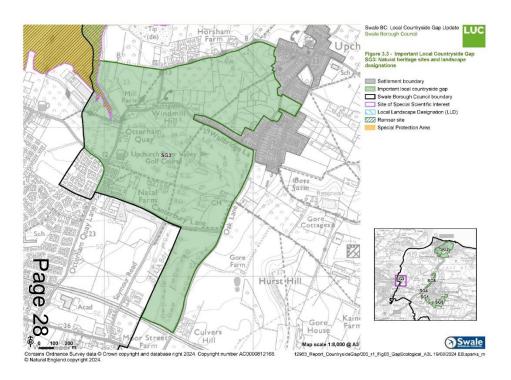
#### Existing

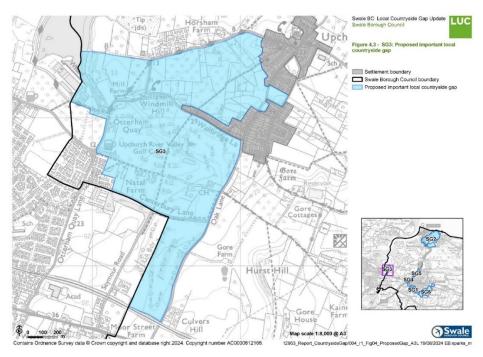


#### Proposed

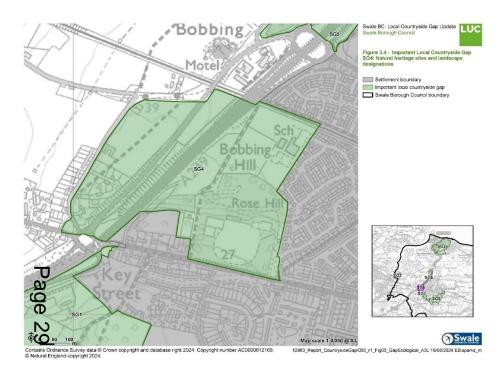


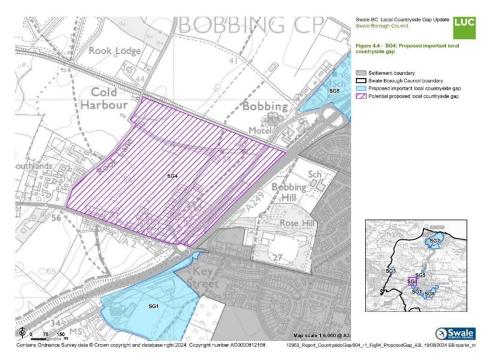
#### SG3: Upchurch and the administrative boundary with Medway Council



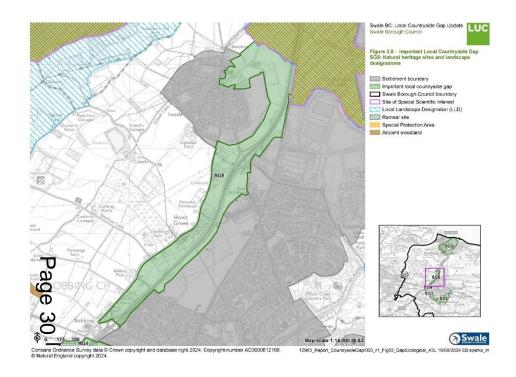


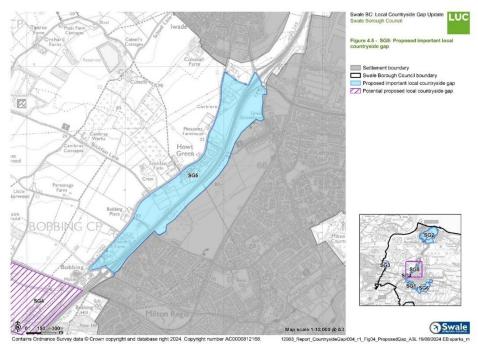
#### SG4: Sittingbourne and the satellite village of Bobbing



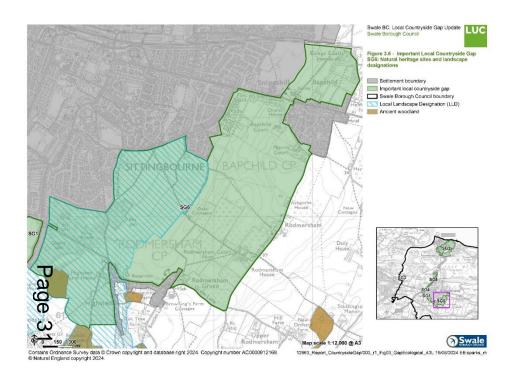


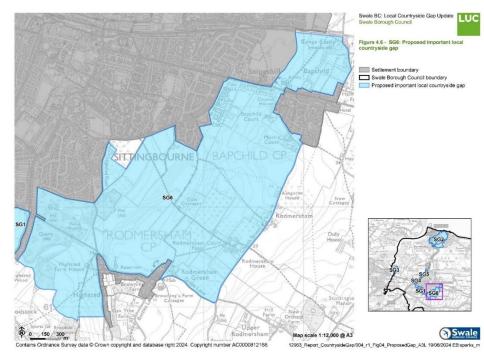
#### SG5: Sittingbourne and the satellite villages of Bobbing and Iwade





#### SG6: Sittingbourne and the satellite villages of Bapchild, and Rodmersham Green





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## **Swale Borough Council**

# Swale Important Local Countryside Gaps Review

**Final report**Prepared by LUC
February 2025





#### **Swale Borough Council**

#### **Swale Important Local Countryside Gaps** Review

		_	_		
Version	Status	Prepared	Checked	Approved	Date
1.	Pilot	A Knight	A Knight	K Ahern	19.07.2024
		A Thompson			
2.	Full draft report	A Knight	A Knight	K Ahern	19.08.2024
		A Thompson			
3.	Final report following client comments	A Knight	A Knight	K Ahern	10.02.2025

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. Arboriculture









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## **Chapter 1**

#### Introduction

## **Project aims**

- 1.1 The aim of this Important Local Countryside Gaps
  Review is to undertake an independent review of the
  Important Local Countryside Gaps around Sittingbourne,
  Upchurch and Sheerness. It will provide a clear evidence base
  on the role these areas play in providing a sense of separation
  between settlements; safeguarding the open and undeveloped
  character of the land; and guarding against coalescence.
- **1.2** The gaps were last reviewed in 2014 and were found to be sound at the previous Local Plan Examination of the current Local Plan: Bearing Fruits (adopted 2017). This review will be used as part of the evidence base for the new Local Plan.
- **1.3** This review follows the same methodology developed by LUC in 2021 to define new Important Local Countryside Gaps between Teynham and Bapchild, Teynham and Lynsted, Faversham and Oare, Faversham and Ospringe and Faversham and Goodnestone.
- **1.4** This study updates the existing Important Local Countryside Gaps in the west of the borough. This ensures all the gaps follow the same methodology and are defined using a consistent method and evidence base.

#### **Important Local Countryside Gaps**

1.5 The sense of separation provided between settlements relates to the character of the gap as well as its size. Small gaps can be effective in maintaining settlement separation if they have a rural character and provide separation. This could be due to a distinct topography, the presence of vegetation which limits inter-visibility between the settlements, or the gap containing a distinct landscape feature. On the other hand, large gaps may not be effective if they have a suburban character, lack vegetation or have clear inter-visibility between the settlements, and lack any other features that might provide a sense of separation such as a distinct topographical or landscape feature.

#### **Background and policy context**

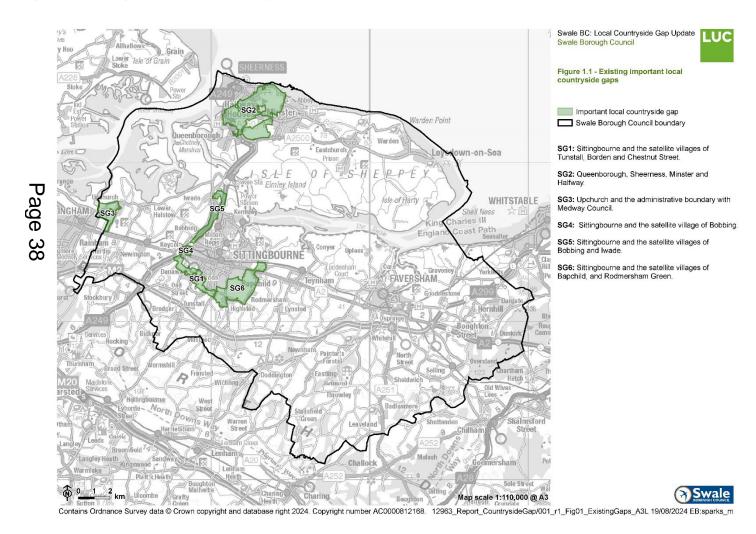
**1.6** Protection of existing settlement pattern and gaps is not specifically mentioned in the National Planning Policy Framework (NPPF 2024), nor the associated PPG. However,

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the concept of settlement gaps is broadly consistent with the NPPF in that: "Strategic policies...should make sufficient provision for ...conservation and enhancement of the natural built and historic environment, including landscapes and green infrastructure" (NPPF paragraph 20) and "Planning policies and decisions should contribute to and enhance the natural and local environment by...protecting and enhancing valued landscape" (NPPF paragraph 187).

- **1.7** In Swale, Important Local Countryside Gaps were defined and set out in the 2008 Local Plan. The boundaries were reviewed and updated in Technical Paper 6 in 2014, and confirmed in Bearing Fruits, the 2017 adopted Local Plan.
- **1.8** The purpose of the Important Local Countryside Gaps, as defined in Policy DM 25 of the Swale Local Plan (2017) are to:
  - maintain the separate identities and character of settlements by preventing their merging;
  - safeguard the open and undeveloped character of the areas;
  - prevent encroachment and piecemeal erosion by built development or changes to the rural open character; and
- influence decisions on the longer-term development of settlements through the preparation and review of Local Plans.
- **1.9** The current defined settlement gaps which this study reviews are listed below, and illustrated on Figure 1.1:
  - Sittingbourne and the satellite villages of Bapchild, Rodmersham Green, Tunstall, Borden, Chestnut Street, Bobbing and Iwade;
- Upchurch and the administrative boundary with Medway Council; and
- Queenborough, Sheerness, Minster and Halfway.

Figure 1.1 Existing Important Local Countryside Gaps



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## **Chapter 2**

# Methodology

- **2.1** An essential element in reviewing areas for local designation is the adoption of a consistent, systematic, and transparent process.
- **2.2** There is currently no prescribed method for assessing 'gap' designations. Strategic gap policies have generally been found sound at Examination when they are supported by robust and up-to-date evidence to justify the extent or purpose of the gaps identified and are focused on protecting specific areas between settlements (rather than all rural areas outside settlements).
- 2.3 The criteria-based approach used in this study draws from LUC's experience in undertaking similar reviews elsewhere in the UK, lessons learned from our involvement in Local Plan examination, the specific requirements of the Council, and from the previous 2021 Important Local Countryside Gaps study. The criteria were drawn up in discussion with SBC Planning Officers.

## Key stages and tasks

- **2.4** All of the existing Important Local Countryside Gaps have been assessed for their continual inclusion within the Important Local Countryside Gaps policy:
- SG1: Sittingbourne and the satellite villages of Tunstall, Borden and Chestnut Street;
- SG2: Queenborough, Sheerness, Minster and Halfway;
- SG3: Upchurch and the administrative boundary with Medway Council;
- SG4: Sittingbourne and the satellite village of Bobbing;
- SG5: Sittingbourne and the satellite villages of Bobbing and Iwade; and
- SG6: Sittingbourne and the satellite villages of Bapchild, and Rodmersham Green.
- **2.5** The Important Local Countryside Gaps recommended in the 2021 study have not yet been adopted and are not included within this review.

#### **Evaluation criteria**

**2.6** The evaluation criteria were developed by LUC drawing on previous strategic gap studies, which have been assessed as robust through the Local Plan examination process. They

have been refined to reflect the particular landscape and settlement pattern of Swale.

**2.7** Each of the Important Local Countryside Gap assessments were undertaken using the criteria set out in Table 2.2.

#### **Desk review**

2.8 The desk review involved a two-step evaluation. The gaps were assessed against the criteria set out in Table 2.2, to understand how the identity of the adjacent settlements and the landscape and visual characteristics of the gap contribute to its character as open and undeveloped land. Each criterion was given a rating as set out in Table 2.1: with commentary on whether the area meets, does not meet or partially meets criteria for designation.

**Table 2.1 Ratings** 

Key	
Fully meets	
Partially meets	
Does not meet	

- 2.9 Sources of information used for the desk study include:
- 1:25,000 OS mapping
- Conservation Area Appraisals

- Google Earth
- Swale Landscape Character and Biodiversity Appraisal
- Swale Landscape Sensitivity Assessment
- **2.10** The gaps were also evaluated against practical considerations, as set out in Table 2.3, including their extent, boundaries and potential for enhancement.
- **2.11** The issues were summarised, concluding whether the area meets the criteria for continual designation as an Important Local Countryside Gap.

#### **Field verification**

**2.12** Field checking was undertaken in July and August 2024 to review information on the ground and test and refine the draft Important Local Countryside Gap assessment and boundaries. The field survey was undertaken from roads and public rights of way.

## Final report and boundaries

- 2.13 The outputs of this review are presented in Chapter 3.
- **2.14** Maps of the existing and proposed refinements to the gaps and their boundaries were mapped at 1:25,000. These were also provided as shapefiles to form part of the Proposals Map for the Local Plan. The boundaries generally follow recognisable physical features, the defined built-up area boundaries or the boundaries of committed development or allocations.

Table 2.2 Important Loca Countryside Gap assessment criteria

Criterion	Explanation	Indicators of a weak gap	Indicators of a strong gap
Existing settlement identity and pattern	Assess the extent to which the settlements or neighbourhoods that lie adjacent to the gap have an individual townscape character and identity that contributes to existing settlement pattern.	The individual townscape character, form and pattern of the settlements or neighbourhoods that lie adjacent to the gap are not distinct.  Loss or partial loss of the gap would not adversely affect the existing settlement pattern.	The individual townscape character, form and pattern of the settlement or neighbourhoods that lie adjacent to the gap are distinct.  The presence of Conservation Areas, Listed Buildings are indicators of individual settlement character.  The gap plays a role in settlement separation and pattern.
Landscape character	Assess the landscape character of the area between the settlements or neighbourhoods and any land use and landscape features within the gap that	There are significant manmade features or urban land uses that contribute to the developed character of the landscape.	Existing rural land uses contribute to the open and undeveloped 'countryside' character of the landscape, e.g. agriculture, horticulture, forestry.

Criterion	Explanation	Indicators of a weak gap	Indicators of a strong gap
	contribute to its character as open and undeveloped land.	The area lacks typical elements of rural vegetation e.g. farmland, hedges, trees etc, which contribute to an undeveloped character.  The area has a suburban character and residential areas outside defined settlement boundaries weaken the perception of the gap as 'countryside'.	The landscape has significant landscape features that contribute to its undeveloped character.  There is a low density or absence of development.
Visual character	Assess the visual character of the area between settlements and any views to settlements or from settlements into the open countryside that contribute to that character and provide visual separation between settlements or neighbourhoods.	Views to and from the settlement do not contribute positively to the visual character of the area.  There is a clear inter-visibility between the settlements due to a lack of vegetation. Intervisibility alone does not indicate a weak gap and this criteria interplays with settlement identity and pattern e.g. intervisibility of contrasting settlement types may contribute to a stronger gap function.	Views to and from the settlement contribute positively to the visual character of the area (e.g. views mentioned in the Landscape Character Assessment/ Conservation Area appraisal).  There are limited/no views between settlements. Landscape elements, such as hills, ridges, and/or tall vegetation within the gap contribute to the sense of visual separation between the settlements.  Alternatively, where there is intervisibility or a narrow gap, the view shows clearly differing settlement character and identity e.g. between an expanding urban edge and distinct rural village.  Open vistas and long views may also indicate a strong gap where they are an important part of the character of the landscape.

**Table 2.3 Practical considerations** 

Criterion	Explanation	Indicators
Gap extent	Assess the role of the extent of the gap in maintaining physical separation between settlements or neighbourhoods.  What is the physical extent of the area between settlements? What are the key routes between settlements?  Appropriateness of distances will vary from area to area and are intrinsically linked to characteristics and features of the landscape which sits between	The gap is less than 2km away from a neighbouring settlement.  The gap should be of sufficient size to make it practical to develop policies for its protection, management and planning.  A distance further than 2km could be considered too great to prevent the coalescence of two settlements.

Criterion	Explanation	Indicators
	settlements i.e. gaps should have the sense of leaving one settlement, moving through the gap before entering a different settlement.	
Boundary defensibility	Boundaries of the existing Important Local Countryside Gaps should follow physical features on the ground, considering potential new boundary features that may alter the risk of settlement coalescence.  Review the pressures on the land between the settlements from draft allocations and promoted sites.	The gap is not subject to draft allocation, or future infrastructure projects.
Potential for enhancement	Review existing environmental designations (both national and local level ecological and cultural heritage designations ), priority habitats and recreational features (including PRoW, cycle paths, open access land/registered common land, allotments, amenity green spaces) to provide an indication of the value of the landscape.  Other sources of information include Swale Blue/Green Infrastructure.  Use this to consider the potential enhancements to existing open space, wildlife areas, cultural heritage and access to the countryside (via PRoW etc).	Presence of green space and recreational values – highly accessible green space, presence of PRoW, recreational facilities e.g. sports pitches, play areas and parks.  Ecological values – environmental designations indicting higher Green Infrastructure value, indicated through the presence of SSSI, SINCs, National and Local Nature Reserves, ancient woodland etc.

2.15 These indicators work in combination, and an Important Local Countryside Gap will not need to fulfil all the criteria equally. The assessments are based on professional judgement, taking account of the complex interplay between the criteria, as well as instances where some criteria might be more important to a particular Important Local Countryside Gap.

## Limitations

- **2.16** This is a strategic level study, undertaken at a scale of 1:25,000.
- **2.17** The gap boundaries are chosen to be functional, defensible and pragmatic. Where possible they follow defined features on the ground including roads, tracks, field boundaries or occasionally rights of way. This means that the gaps may include some areas that are not critical to a gap function but are included for practical reasons.
- **2.18** Similarly, the boundaries of the gaps are taken up to the existing settlement edge represented by built

development/settlement boundary or the extent of proposed allocations. The definition of a critical area of gap away from the existing settlement edges would not be practical or defensible.

**2.19** Finally, it should be noted that an Important Local Countryside Gap is not a landscape quality designation. Gaps may include degraded elements or features including for example abandoned land, areas of polytunnel/glasshouses, quarries or limited development. The key requirement is that overall, they have a rural/countryside character and are not developed.

# **Chapter 3**

# **Important Local Countryside Gap Assessments**

**3.1** This chapter presents the results of the review of the six existing Important Local Countryside Gaps against the agreed assessment criteria set out in Chapter 2.

## SG1: Sittingbourne and the satellite villages of Tunstall, Borden and Chestnut Street

Figure 3.1 Natural heritage and landscape designations

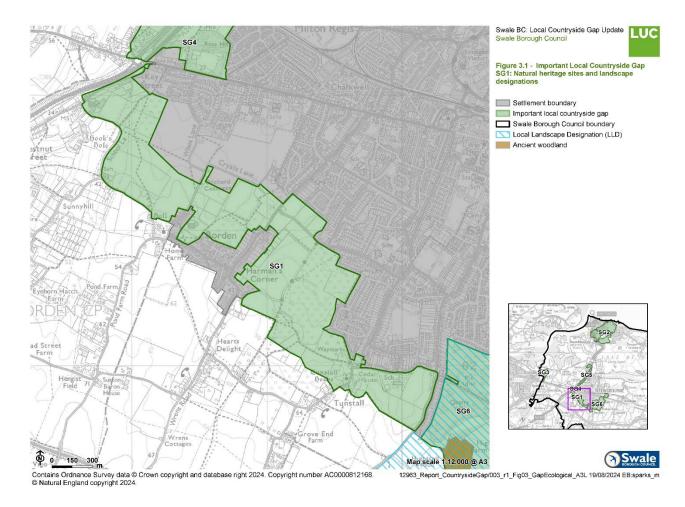


Figure 3.2 Cultural heritage and recreation

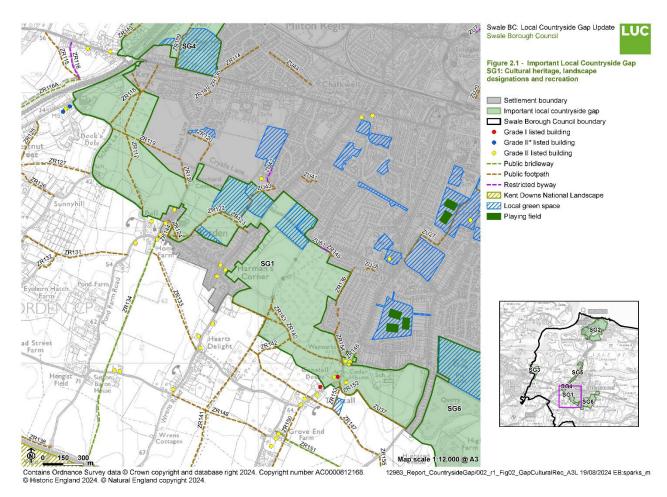


Figure 3.3 Representative photos







View north from the edge of Tunstall on ZU37 looking towards Sittingbourne

## Location and extent of area

Table 3.1 Summary of existing gap

SG1: Sittingbourne and the satellite villages of Tunstall, Borden and Chestnut Street	
Location and extent of area	The gap lies to the south and south-west of Sittingbourne. The boundary follows the A249, School Lane, settlement edge of Borden and field boundaries before ending in the east at Ruins Barn Road. Important Local Countryside Gap SG6 lies to the east of Ruin Barn Lane.
Landscape character context	LCA 19: Borden Mixed Farmlands LCA 42: Tunstall Farmlands.

Table 3.2 Assessment criteria

Assessment criteria	Rating	Commentary
Existing settlement identity and pattern		Sittingbourne
		Sittingbourne was a small market town along the Roman road of Watling Street, which expanded in the medieval era as a route for pilgrims travelling to Canterbury. This continued into the 18 <sup>th</sup> century as Sittingbourne was an important stopping point on the journey between London and Canterbury. In the 20 <sup>th</sup> century Sittingbourne expanded considerably in all directions, including to incorporate the originally separate settlements of Key Street in the west and farmland of Gore Court Park. The western edge of Sittingbourne is contained by the A249 Maidstone Road. The south-western edge is less well defined.
	Fully moote	Chestnut Street and Borden
	Fully meets	Borden parish lies to the immediate south-west of Sittingbourne and contains a number of small settlements including the roadside settlement of Chestnut Street. A number of Roman trackways ran south through the parish from Watling Street, with evidence of villas and burials. The parish was part of a late Anglo-Saxon estate centred at Milton, and the dispersed pattern of hamlets and farms can still be read in the landscape at Chestnut Street and Harman's Corner. A number of housing developments from the 1970s has enlarged the size of Borden village. They have also caused Borden and Harman's Corner to coalesce.
		Land at South West Sittingbourne, along Wises Lane, has permission for up to 675 dwellings, primary school,

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Assessment criteria	Rating	Commentary
		local retail and commercial facilities, sports facilities and a link road between Borden Lane, Chestnut Street and the A249. This development largely lies within the settlement boundary of Sittingbourne. However, the link road to Chestnut Street and the A249 will run south of the electricity substation within the gap between Chestnut Street and Sittingbourne.
		There is clear separation between the edge of Sittingbourne / Key Street and Chestnut Street and Borden. The Borden – The Street Conservation Area Appraisal states 'The continued separation between Borden and Sittingbourne is a crucial component of the setting allowing the historic plan of the settlement to be preserved and its agricultural context which was so important to its development'.
		Development currently under construction west of Wises Lane and south of Key Street / Sittingbourne brings the edge of Sittingbourne closer to the east of Chestnut Street
		Tunstall
		Tunstall was recorded in the Domesday survey and remains a linear settlement along Tunstall Road. Post war housing development on the southern edge of Sittingbourne has significantly reduced the gap between the two settlements. However, Tunstall Conservation Area Appraisal states that 'Despite the southwards expansion of Sittingbourne up to its very northern edge, Tunstall's identity continues to remain remarkably rural in character and distinct from Sittingbourne's suburbs'.
		A planning application was recently allowed at appeal for up to 290 dwellings, footpaths and cycle routes, landscaping and other infrastructure works on the edge of Sittingbourne, between Harman's Corner and Tunstall.
Landscape character		Chestnut Street and Borden
	Fully meets	Most of the land between Sittingbourne / Key Street and Chestnut Street and between Sittingbourne and Borden is in agricultural use, with arable cropping dominant. An electricity substation, electricity pylons, and large farm buildings along School Lane in the west

Assessment criteria	Rating	Commentary
		are modern elements in the landscape. A former chalk quarry and landfill on the northern edge of Borden is regenerating with grassland and scrub. It is now a nature reserve and designated as a Local Green Space. Land to the north-east of Borden is in use as allotments and also designated as a Local Green Space. Small areas of land are recorded as priority habitat traditional orchard, although these do not appear to be in use as orchards now.
		Tunstall
		Land immediately east and west of Tunstall is in agricultural use for arable cropping. To the north the land is in use for commercial orchards. The gap includes parts of the historic core of Tunstall including the Grade I listed Church of St John the Baptist. Educational facilities associated with Tunstall C of E primary school and a training ground lie south of Tunstall Road and west of Ruins Barn Road. There is limited additional development within the gap. Small areas of land are recorded as priority habitat traditional orchard, although these do not appear to be in use as orchards now.
Visual character		Chestnut Street and Borden
		Chestnut Street Conservation Area Appraisal states that the surviving open countryside to the east of the hamlet forms part of the important open spaces preserving the sense of the rural location of the hamlet. Mature hedgerows and result in no views between Chestnut Street and Key Street / Sittingbourne.
	Fully meets	Borden - The Street Conservation Area Appraisal states that land to the north contributes to the rural countryside setting of the village. There are long distance views across Sittingbourne towards the Swale and Sheppey. Hedgerows and mature trees within Borden Nature Reserve restrict views between the existing settlement edge of Sittingbourne and Borden.
		Tunstall
		There is a strong relationship between the Tunstall Conservation Area and surrounding landscape, experienced through views and vistas and on the

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Assessment criteria	Rating	Commentary
		public footpath network. Despite the close proximity of Sittingbourne, houses along Tunstall Road result in no views between the two settlements.
		The undulating topography and hedgerow boundaries result in no views between Chestnut Street, Borden and Tunstall.

**Table 3.3 Practical considerations** 

Consideration	Commentary
Gap extent	Chestnut Street
	The gap between Key Street / Sittingbourne and Chestnut Street the south of Bapchild is around 310m. The main route between the settlements is Chestnut Street in the north. Public right of way ZR118 leads between Key Street / Sittingbourne and School Lane, although not directly into Chestnut Street. The electricity substation is a modern element along Chestnut Street between the two settlements. Development currently under construction west of Wises Lane and south of Key Street / Sittingbourne brings the edge of Sittingbourne closer to the east of Chestnut Street but does not bridge the gap. The gap between the new settlement edge and School Lane is therefore important if the separate settlements are to be retained. Part of the new development on Wises Lane is to provide a new road junction with the A429. This will cross the gap between Chestnut Street and the electricity substation. While the road itself will not reduce the gap extent, it will create another modern element within the gap.
	Borden
	The gap between Borden and Sittingbourne is around 230m. The main routes between the settlements are Wises Lane in the west and Borden Lane in the east. Despite the short distance between the settlements there is a sense of leaving one settlement and travelling to another while travelling along both roads. Development at the junction between Wises Lane and Cryalls Lane reduces the perception of the gap. Public right of way ZU43 / ZR122 links the settlement edge of Sittingbourne and Borden. This runs through the Borden Nature Reserve, and there is a strong sense of leaving one settlement and walking to another.
	Tunstall
	The gap between Sittingbourne and Tunstall is around 160m. However, the perception of the gap is much smaller due to development along Tunstall Road.
	The main vehicle route between Sittingbourne and Tunstall is along Tunstall Road. The layout of the road and development along it is such that there is a perception of leaving Sittingbourne and travelling to a new settlement, albeit at a very close proximity.
	Public rights of way ZR146 and ZR154 link the settlements. ZR154 runs along the settlement edge of Sittingbourne, with

Consideration	Commentary
	views across open countryside providing the experience of leaving one settlement and arriving at another. Bridleway ZR146 is shorter and has fewer open views as it is contained by development. However, on exiting at Tunstall Road there are glimpsed views through the hedgerow to open fields, and the positioning of Tunstall at a right angle also provides the experience of travelling between two separate settlements.
	New development between Sittingbourne and Tunstall will reduce the perception of the gap between the settlements as the boundary of Sittingbourne will expand westwards.
Boundary defensibility	The boundaries of the existing Important Local Countryside Gap are defined by on the ground features. From the west, it follows Chestnut Street and the A249, before following School Lane. The gap follows a field boundary around Borden Hall, and then the settlement boundary of Borden before following footpath ZR140, ZR141 and field boundaries to reach Tunstall. The gap boundary follows Tunstall Road, ZR152 and ZU37 to reach Ruins Barn Road in the east, which forms the Sittingbourne settlement boundary.
	Sports pitches for the new development along Wises Lane will extend south of the existing settlement edge, south of Cryalls Lane. The sports pitches will decrease the perceived gap between Sittingbourne and Borden. However, planned planting of trees and native hedgerows will provide further screening between residential development in both settlements.
	The illustrative masterplan for new development planned between Harman's Corner and Tunstall indicates a large area of open space on the southern and western edges of the application site. This development will therefore considerably decrease the gap between the edge of Sittingbourne and Tunstall, and between Sittingbourne and Harman's Corner / Borden, but not close it.
Potential for enhancement	There are no national or local level ecological designations within the gap between Chestnut Street, Borden, Tunstall and Sittingbourne. There are small areas of priority habitat traditional orchard recorded, although these are no longer intact. Conservation, sensitive management and potential expansion of traditionally managed orchards should be explored. Other relevant enhancements noted in the LCAs include conserving hedgerows, shelterbelts and mature and remnant orchards.
	The gap contains a number of Conservation Areas at Borden Chestnut Street, Borden the Street, Borden Harman's Corner and Tunstall. All the Conservation Areas contain clusters of listed buildings. The setting of all these heritage assets should be enhanced.
	Parts of Wises Lane and Wrens Road are designated as Rural Lanes, which contribute to the rural amenity, nature conservation and character of the landscape. There are opportunities to enhance the rural characteristics of these roads. There are a number of public rights of way in the gap, which can be enhanced to increase access to and enjoyment of the countryside.

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Swale Important Local Countryside Gaps: SG1 Sittingbourne and the satellite villages of Tunstall, Borden and Chestnut Street February 2025

#### **Summary**

- **3.2** The analysis above indicates the gap between Chestnut Street, Borden, Tunstall and Sittingbourne is a gap between distinct settlements. The continued expansion of Sittingbourne southwards, as shown by the approved developments at Wises Lane and south-west of Sittingbourne means that an Important Local Countryside Gap is still relevant and important in this location.
- **3.3** Chestnut Street, Borden, Tunstall and Sittingbourne all have distinct characters and identities, and people travelling between the settlements, whether on foot or by vehicle, have an experience of leaving one distinct settlement and travelling to another.
- 3.4 There are currently no views between any of the settlements, which contributes to their character as separate settlements.

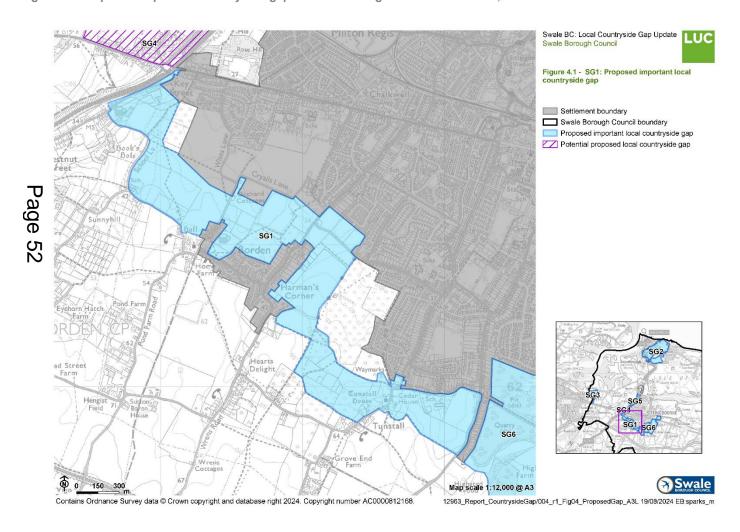
#### Recommendation

It is recommended that the gap is largely retained at its current extent to avoid the coalescence of Sittingbourne, Chestnut Street, Borden and Tunstall.

The settlement boundary of Sittingbourne, and therefore the gap, should consider the recent planning permission for housing development south-west of Sittingbourne. The gap should then be extended south to follow ZR147, ZR142 and ZR141 to retain a robust gap between Sittingbourne, Tunstall and Borden.

February 2025

Figure 3.4 Proposed important countryside gap between Sittingbourne and Tunstall, Borden and Chestnut Street



## SG2: Queenborough, Sheerness, Minster and Halfway

Figure 3.5 Natural heritage and landscape designations

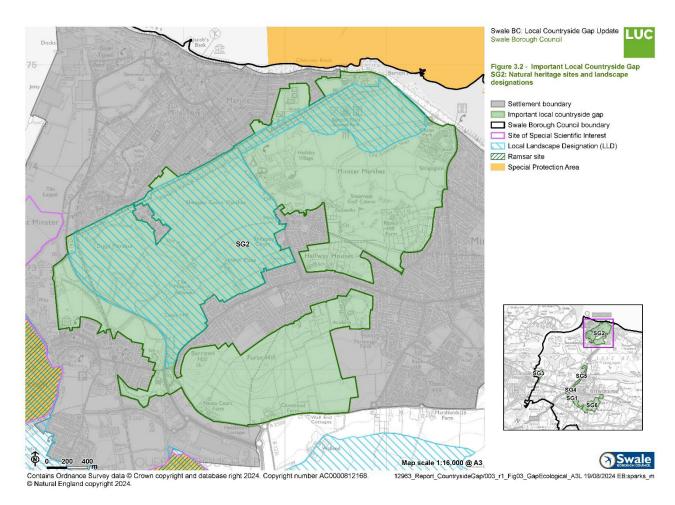


Figure 3.6 Cultural heritage and recreation

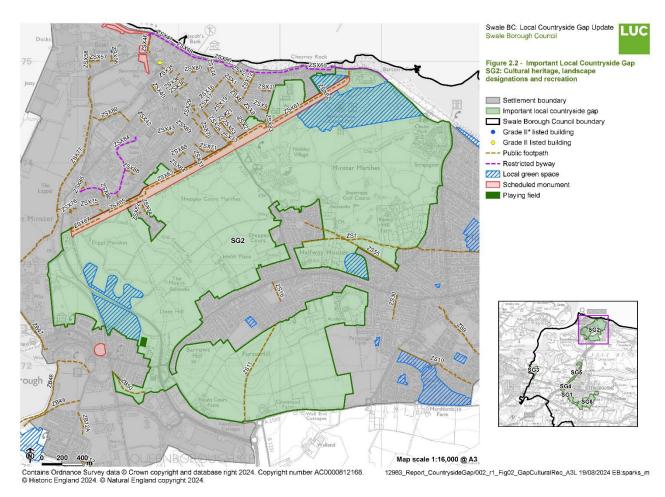


Figure 3.7 Representative photos







View looking east across Diggs Marshes towards Minister

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## Location and extent of area

Table 3.4 Summary of existing gap

SG2: Queenborough, Sheerness, Minster and Halfway	
Location and extent of area	The gap lies to the southeast of Sheerness, west of Minster and east of Queenborough. Halfway sits in the middle of the gap with the A2500 forming the boundary of the more open southern edge.
Landscape character context	LCA 09: Minster Marshes  LCA 10: Sheppey Court and Diggs Marshes  LCA 13: Central Sheppey Farmlands

Table 3.5 Assessment criteria

Assessment criteria Rating Commentary		
Rating	Commentary	
	Sheerness	
Fully meets	Sheerness is in the north-west of the Isle of Sheppey. It was the site of a fort built in the 16 <sup>th</sup> century to protect the river Medway from naval invasion and to protect the naval dockyard at Chatham. During the 17 <sup>th</sup> century it was developed into a Royal Dockyard. There was no existing settlement at Sheerness at this time and it wasn't until the mid-18 <sup>th</sup> century that workers built the first houses with materials from the dockyard. Blue Town is named from the grey-blue naval paint used on the exteriors. Modern day Sheerness is the coalescence of three formerly distinct settlements of Blue Town, Mile Town and Marine Town. Mile Town was developed in the early 18 <sup>th</sup> century to provide new facilities to the cramp conditions of the docks at Blue Town. The Mile Town Conservation Area focuses on the High Street north of The Broadway. The Mile Town and Marine Town Conservation Areas have a mostly Victorian character. Infill development constructed in the mid-20 <sup>th</sup> century housed the workforce for the expanding dockyards to the west. This residential development of mostly two story semi-detached and terraced housing now forms the northern edge of the Important Local Countryside Gap. Sheerness is now the largest port in the UK for motor imports. The southern edge of development at Sheerness is restricted by marshlands.	

Assessment criteria	Rating	Commentary
		Minster is the largest town on the Isle of Sheppey and sits on the highest point of the underlying London Clay. Minster gets its name from the Saxon Abbey on the hilltop. Minster spread north to the coastal edge and west towards Sheerness and Halfway during the 20 <sup>th</sup> century with suburban estates and grew considerably in population. This more recent area of development consists largely of two-storey terraced and semi-detached houses and bungalows. Minster and Sheerness are separated by the low-lying alluvial marshlands of Minster Marshes. Development in Minster has also spread east along Minster Road to coalesce with Halfway. Halfway has in turn has spread along Queenborough road to erode the sense of separation between Halfway and Queenborough. The area between Minster and Halfway has since experienced more infill housing which now forms part of the southern boundary of the Important Countryside Gap.
		Queenborough
		Queenborough is a small maritime town of medieval origin on the west coast of the Isle of Sheppey just south of Sheerness. The town formed Queenborough Castle (now a Scheduled Monument) which is sited on a small hill of the underlying London Clay. The northern edge of the town is defined by Diggs Marshes with the southern boundary dictated by the creek and mudflats. Queenborough today still reflects its 18th century seafaring history from which period most of its most prominent buildings survive. The Queenborough Conservation Area Appraisal states "Water has shaped the history of the town, through fishing, maritime trade, yachting and the ongoing control of flooding and drainage of the surrounding marshes. It is a key characteristic of the conservation area and defines its setting".
Landscape character	Fully meets	The northern area of the gap between Sheerness and Minster to Halfway Road has a level former marshland landform that is now largely used for recreational purposes. Development at Sheerness Golf Club is the dominant feature to the south, Sheerness Holiday

Assessment criteria	Rating	Commentary
		Park to the west, and Bartons Point Coastal Park to the north. These three areas are separated by Minster Marshes running from east to west through the centre of the gap. Much of this area, excluding the golf course, forms the Minster Marshes LWS. Whilst the marsh retains much of its original character through ditches and counter walls it is substantially affected by the industrial and residential development which surround it. Abbey Rise in the south is an important local feature. It forms one of the few areas of higher ground between Minster and Halfway.
		The eastern part of the gap comprises a landscape of grazing marsh encapsulated by Sheerness, Halfway, and Queenborough. It forms the whole of LCA 10 Sheppey Court and Diggs Marsh. The marsh retains many elements of its original character but is affected by the roads, railways, and pylons which cross the west. Much of the area is locally designated as the Diggs and Sheppey Court Marshes, Queenborough LWS.
		The southern part of the gap between Queenborough and Minster is of a largely agricultural character. This area also has a much more complex landform with an undulating topography compared to the low-lying Swale Level in the north. This landscape here forms part of the clay ridge that runs across the northern half of the Isle of Sheppey. This clay ridge forms a series of hills from Queenborough to Minister. Barrows Hill and Furze Hill both sit in the Important Local Countryside Gap and form a green backdrop to the lower lying settlement of Halfway/Minster and an important contrast to the nearby marshes.
		Most of the land around Queenborough is mudflats and marshland. The historic core of Queenborough sits on a small, elevated hill, around the Queenborough Creek.
Visual character	Partially Meets	There is clear intervisibility between Sheerness, Queenborough and Minster due to the low-lying, open topography across the marshes and golf course. coupled with the historic core of Minster situated on the hilltop.

Assessment criteria	Rating	Commentary
		Views from the gap towards the surrounding settlements do not contribute to the rural / countryside character of the gap. The visible development at Sheerness, Minster and Halfway is mid-20 <sup>th</sup> century two-storey housing that does not relate to the distinct characters of each settlement.
		The area has a generally open and exposed character with some extensive views crossed by the local transport corridors and the pylons across Diggs Marsh. There are long and distinctive views across the marshes from Minster.

**Table 3.6 Practical considerations** 

able 5.6 Practical considerations		
Consideration	Commentary	
Gap extent	Minster	
	The gap between Minster and Sheerness is 750m at its narrowest point along the Halfway Road (A250) and 1750m at its widest point. Along with the A250 Halfway Road the other main road connections between the two settlements are Brielle Way to the west and Marina Parade to the east. Although the gap is quite narrow along these transport routes there is still a clear sense of departure/arrival between these two distinct settlements due to the undeveloped nature of the marshes.	
	The northern part of SG2 has Public Footpaths ZS1 and ZS55 in its southern section and ZXS61 and ZXS63 running across its northern boundary from Bartons Point to Diggs Marshes.	
	Queenborough	
	The gap between Queenborough and Sheerness is around 1000m of Diggs Marshes. The main route between the two settlements is Brielle Way (A249). There is a clear sense of departure and arrival between these two settlements due to the undeveloped and open nature of Diggs Marshes.	
	The main route to Halfway/Minster from Queenborough is the B2007/A250 which has been developed along its route and reduced the gap between the two to 150m. The narrow nature of the gap in this area and the intervisibility between the two settlements means that there is no sense of leaving one area and entering another either by car or by foot.	
	The gap to the south of Halfway and east of Queenborough with its elevated topography of Furze Hill and Barrows Hills creates a visual screen between Queenborough and Halfway/Minster and as such does create a sense of departure/arrival when travelling along Queenborough Road /A2500 toward the southern edge of Minster. This area is crossed by the Public Footpath ZS11 linking Queenborough Road to Minster which traverses Furze Hill and leads to residential development at Halfway.	

Consideration	Commentary
Boundary defensibility	The existing northern boundary of the gap largely follows the developed settlement edge of Sheerness to the north, Minster to the south, and Queenborough in the southwest. There is an already developed area at Mister Park off The Broadway in the east which could be excluded without any major effect on the separation between Minster and Sheerness. Marine Parade forms the north-east boundary to this part of the gap.
	The western boundary is defined by the B2007 and then wraps around Queenborough until it meets the railway line. It then follows the settlement boundary to run along the A2500. The eastern edge cuts north across field boundaries then follows the irregular boundaries of residential garden boundaries. This area includes the grounds of the Oasis academy which with its open sports fields contributes to the open feel of the gap
Potential for enhancement	There are already some public rights of way across the southern part of the gap and along the top of the northern part of the gap. These could be enhanced and extended to increase access and enjoyment of the countryside. The existing recreational land uses such as holiday parks should be integrated into the landscape, using appropriate vegetation.
	Similarly, the stark edge of Halfway should be softened to ensure the interface with the marshland is more sympathetic. The areas of priority habitat coastal and floodplain grazing marsh could be expanded southwards towards the Sheerness Golf Course and Sheppey Court. Appropriate grazing regimes should be encouraged.
	There are opportunities to link lines of trees and areas of scrub woodland with native planting to provide visual continuity and reduce the unnatural effect of isolated planting. There are opportunities around Barrows and Furze Hills to restore a stronger landscape structure through tree and shelterbelt planting along with the creation or enhancement of hedgerows along roads and in denuded areas.
	Enhance the heritage value of the Queenborough Lines Scheduled Monument which runs along the north of the gap through further interpretation.

## **Summary**

- **3.5** The analysis above indicates that the gap between Sheerness, Queenborough, and Minster is a large gap with an open character between three distinct settlements. The main area most at risk of coalescence is the small gap between Queenborough and Minster defined by Brielle Way. The sense of travelling between two distinct settlements is most at risk in this area.
- **3.6** The analysis above indicates the gap between Sheerness, Queenborough, and Minster continues to meet the criteria for designation for an Important Countryside Gap. The area has a rural character which separates the three settlements and people travelling between them, whether on foot or by vehicle, have an experience of leaving one distinct settlement and arriving at another.

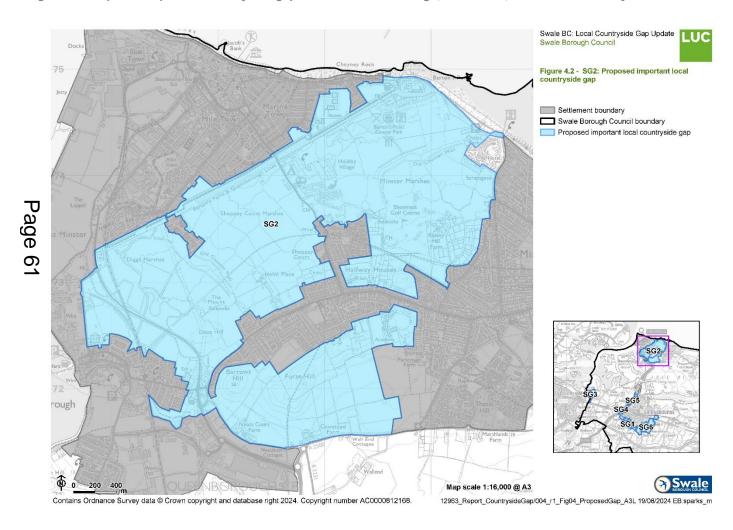
Swale Important Local Countryside Gaps: SG2 Queenborough, Sheerness, Minster and Halfway February 2025

## Recommendation

It is recommended that the gap is retained between Sheerness, Queenborough, and Minster to avoid the coalescence of these settlements. The main threat to coalescence is between Queenborough and Minster along the B2007 with the A249 forming the only real boundary between the two.

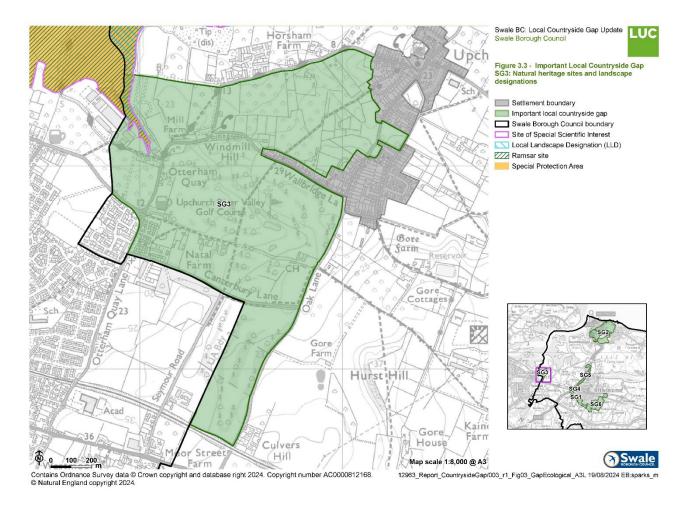
One change to the boundary is required to exclude the Minster Park area off Ash Lane in the north-east of the gap. This is an established residential area that does not add to the rural countryside character of the gap.

Figure 3.8 Proposed Important countryside gap between Queenborough, Sheerness, Minster and Halfway



## SG3: Upchurch and the administrative boundary with Medway Council

Figure 3.9 Natural heritage and landscape designations



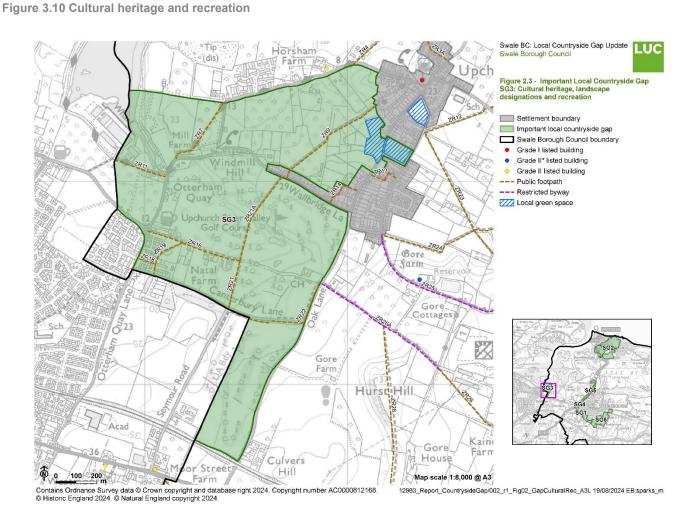


Figure 3.11 Representative photos





View from footpath ZR21A looking south towards Rainham

## Location and extent of area

Table 3.7 Summary of existing gap

SG3: Upchurch and the administrative boundary with Medway Council	
Location and extent of area  The gap lies to the west of Upchurch with Oak Lane forming most of its eastern boundary, Horsham Lane the north boundary and the administrative boundary with Medway council forming the western boundary.	
Landscape character context	LCA 32. Upchurch and Lower Halstow Fruit Belt

Table 3.8 Assessment criteria

Assessment criteria	Rating	Commentary
	- Trading	·
Existing settlement identity and pattern		Upchurch  Until the 20 <sup>th</sup> century Upchurch consisted of a church, a few groups of modest cottages, a village school, shops and public houses. 20 <sup>th</sup> century housing developments changed the character to one of modern residential estates albeit it retains a rural village character at the core.
		There is a clear sense of separation between Upchurch and Rainham, which lies on the other side of the Medway Boundary. This sense of separation is also aided by the Otterham Creek to the north-west.
		Rainham
	Fully meets	Rainham was originally a linear settlement which developed along the now A2. When the railway arrived in 1858 it brought growth to the area with the village spreading north in the direction of Upchurch. The population of Rainham expanded again when the line was electrified in 1959 especially to the south of the A2 with a large housing estate called Park Wood. To the west of Rainham there is almost continuous development along the A2 which leads to a merging with the eastern edge of Gillingham. Land along Otterham Quay Road has attained planning permission on appeal for a development of 74 dwellings with public open space. This will extend the existing edge of Rainham further into the gap.
Landscape character	Fully meets	Upchurch  A large part of the undeveloped area hot was a large part of the undeveloped area
		between Upchurch and the Medway Borough Council administrative boundary is taken up by the Upchurch

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Assessment criteria	Rating	Commentary
		River Valley Golf Course. The course has mature Poplar boundaries as well as screening between individual holes. The landform in this area falls steeply to the south giving good views across Rainham and the neighbouring landscape.
		The gap to the north of Wallbridge Lane has a different character being a mix of orchards, horse paddocks, some small residential development, allotments and the recreation ground. A park home estate is situated on north-west edge. This area also contains an overgrown orchard formerly part of Horsham Farm. The landform in this area is a gentle slope down to Otterham Creek. The dense orchard planting and high hedges in this area allow for far shorter views and a stronger feel of visual enclosure.
Visual character		There is no visual relationship between Upchurch and Rainham due to the mature screening provided by the trees that surround much of the golf course.
	Fully meets	High roadside hedgerows, containing trees, also help with the sense of visual enclosure with any gaps in boundaries quickly blocked by the densely planted mature orchards beyond.

**Table 3.9 Practical considerations** 

Consideration	Commentary
Gap extent	The gap between the southern edge of Upchurch and the north-eastern edge of Rainham is 1km. The main road connections between the two settlements are Horsham Lane and Wallbridge Lane which are both locally designated Rural Lanes.
	The two settlements are also linked by public footpaths. ZR21A, ZR16, and ZR19 link up to cross the golf course. Footpaths ZR9 and ZR7 cross the orchards and paddocks in the north to reach Upchurch.
	There is a clear sense of travelling between two settlements by car and on foot. The high hedges, mature trees and the rising landform making views between the two settlements almost impossible.
Boundary defensibility	Oak Lane defines much of the eastern boundary of the gap running from the railway line and the A2 to the south all the way north to Upchurch.
	A residential development completed in 2018 in the southwest has only eroded the gap by a small area. This is

Consideration	Commentary
	perceived as part of Rainham and should be excluded from the Important Local Countryside Gap.
	There is a permitted development along Otterham Quay Road for 74 dwellings. This development will extend the edge of Rainham further into the existing gap closer towards the south-east edge of Upchurch. This area should be excluded from the Important Local Countryside Gap.
	The gap to the south of Wallbridge Lane is defined by the golf course and the Medway Borough Council boundary.
Potential for enhancement	Horsham Lane and Wallbridge Lane are designated as Rural Lanes, which contribute to the rural amenity, nature conservation and character of the landscape. Enhancements could be made to these as well as the rights of way that cross the gap.
	Additional planting should be used to maintain and enhance the well-integrated edges of Upchurch and to integrate the new development edges of Rainham. This could include hedgerows, shelterbelts and community orchard planting.
	A small part of the Medway Estuary and Marshes Ramsar, SPA and SSSI extends into the gap west of Otterham Quay Road. Opportunities to conserve, enhance and expand the estuarine and marshland habitats should be encouraged.
	There are small areas of priority habitat traditional orchard on the edges of Upchurch and at Natal Farm. These should be conserved and sensitively managed. Opportunities for new non-intensively managed orchards should be pursued on land of lower biodiversity value.

## Summary

- **3.7** The analysis above indicates that the gap between Upchurch and Rainham is an important gap that is at most risk of coalescence along Otterham Quay Lane/ Wallbridge Lane.
- **3.8** The analysis above indicates the existing gap between Upchurch and the administrative boundary with Medway Council/Rainham continues to meet the criteria for an important countryside gap. The area has a rural character that separates the settlements of Upchurch and Rainham. People travelling between the settlements, whether on foot along the footpaths or other modes of transport along the roads have an experience of leaving a distinct settlement and travelling to another.
- **3.9** There are no views between Upchurch and Rainham due to the mature vegetation around the golf course and through the fruit farms that make up the gap. This contributes to their character as separate settlements.

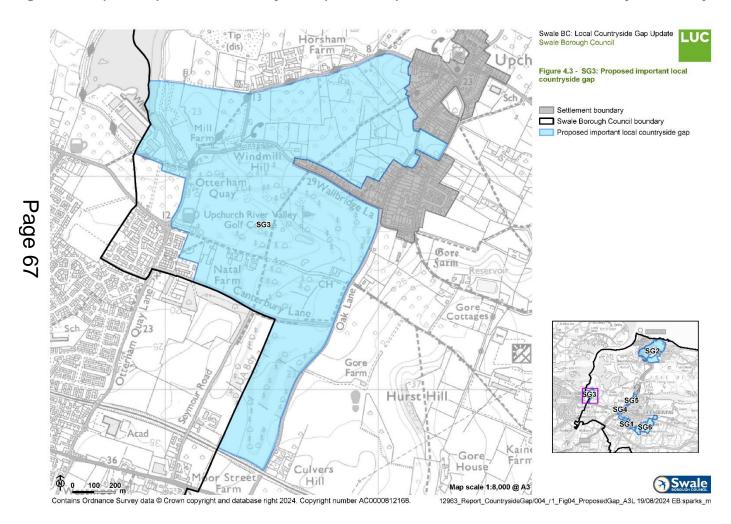
## Recommendation

It is recommended that the Important Local Countryside Gap is retained at its current extent to avoid coalescence of Upchurch and Rainham. A change to the boundary is required in the south-west due to a recent development on the edge of Rainham along Otterham Quay Lane.

A small amendment to the boundary should be made to allow for the permitted development on Otterham Quay Lane. The current proposal shows development restricted to the south of the site which allows the north to remain part of the gap.

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Figure 3.12 Proposed Important Local Countryside Gap between Upchurch and the administrative boundary with Medway Council



## SG4: Sittingbourne and the satellite village of Bobbing

Figure 3.13 Natural heritage and landscape designations

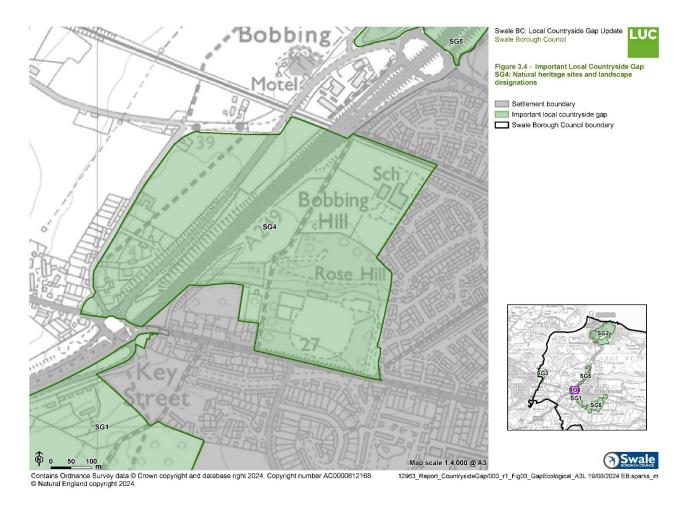


Figure 3.14 Cultural heritage and recreation

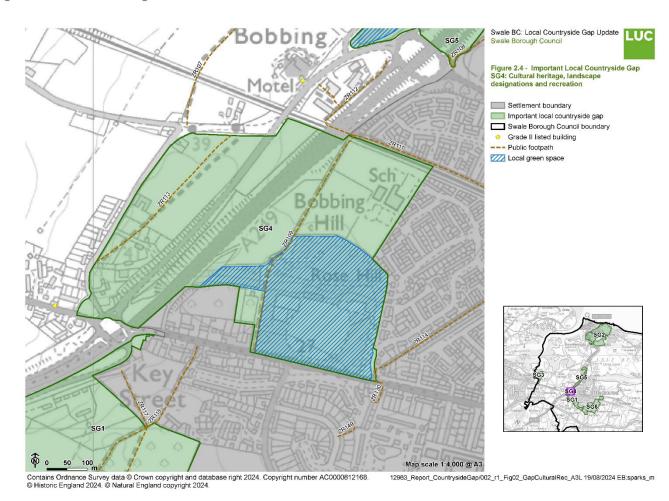


Figure 3.15 Representative photos



## Location and extent of area

Table 3.10 Summary of existing gap

SG6: Sittingbourne and the satellite village of Bobbing	
Location and extent of area	The gap lies to the west of Sittingbourne and encompasses Rose Hill. The gap crosses the A249, and the western boundary is formed by Bobbing Hill. The northern boundary is formed by the railway line.
Landscape character context	LCA 24: Iwade Arable Farmlands.

Table 3.11 Assessment criteria

Assessment criteria	Rating	Commentary
Existing settlement identity and pattern		Sittingbourne
		Sittingbourne was a small market town beside the Roman road of Watling Street, which expanded in the medieval era as a route for pilgrims travelling to Canterbury. This continued into the 18 <sup>th</sup> century as Sittingbourne was an important stopping point on the journey between London and Canterbury. In the 20 <sup>th</sup> century Sittingbourne expanded considerably in all directions. The western edge of Sittingbourne largely follows the historic edge of Rose Hill house and grounds north of the A2. South of the A2, the settlement edge of Sittingbourne has coalesced with Key Street and extends to the A249.
		Bobbing
	Partially meets	Bobbing is a very small linear settlement based along Sheppey Way (formerly Ferry Road). It contains a few listed buildings including the Grade I listed Church of St Bartholomew and the 18 <sup>th</sup> century Grade II listed Bobbing Court. There is no Conservation Area. The village lies north of the railway line. In the late 1990s the dual carriageway A249 was constructed to the east of the existing road, providing a barrier between Bobbing and the expanded edge of Sittingbourne.
		West of the A249 and south of the railway line early 20 <sup>th</sup> century linear development lies along Bobbing Hill.
		Bobbing does not have a very strong individual settlement identity. The loss of the gap to the east of the A249 and south of the railway line, would not adversely affect the existing settlement pattern. The transport routes, including the roundabout junction between the A2 and A249, provide a clear barrier between Bobbing and Sittingbourne.

Assessment criteria	Rating	Commentary
Landscape character		East of the A249, land is in use in the north as educational facilities including playing fields. There are mature trees along the railway line and the A249. The south of the area comprises Rose Hill woods, recorded as priority habitat deciduous woodland, and Grove Park. Grove Park was gifted to the local authority as a public park in 1931 and is now used by Sittingbourne Rugby Club and Gore Court Hockey Club. Rose Hill woods and Grove Park are designated as a Local Green Space. Land west of Grove Park is in arable use, with strong hedgerow boundaries.
	Partially meets	West of the A249 land is under arable cropping and contains small residential properties and a small-scale business centre. Mature trees line the A249, and field boundaries are bound by hedgerows.
		Although there is development within the gap, it is limited and does not detract from the undeveloped character. However, the educational facility and recreational land uses weaken the perception of the gap as 'countryside'.
		The gap is dominated by the dual carriageway A249, which is lined by mature vegetation. The road creates a physical infrastructure barrier between the settlements.
Visual character	Fully meets	Mature treelines along the railway line and A249, as well as the woodlands of Rose Hill ensure that there are no views between Sittingbourne and Bobbing.

**Table 3.12 Practical considerations** 

Consideration	Commentary
Gap extent	The gap between Sittingbourne and Bobbing in the north is 170m, and along the A2 in the south is 230m. The railway line passes through both settlements in the north, and the A2 connects the settlements in the south. The large transport infrastructure of the A249, large roundabout between the A2 and the A249, and the A249 being in cutting, creates the sense of leaving one settlement and travelling to another.
	Footpath ZR111 runs along the north of the railway line and crosses under the A249 to join to Bobbing. Passing under the A249 gives the perception of leaving one settlement and entering another.
Boundary defensibility	The boundaries of the existing Important Local Countryside Gap follow Bobbing Hill in the west and the access road before running along the railway line to the settlement edge

Consideration	Commentary
	of Sittingbourne. In the south the gap boundary follows the A2, the settlement boundary of Sittingbourne and the A2 again south of Grove Park.
	Although there is educational and recreational development within the gap to the east of the A249, this does not erode the gap or cause perceived coalescence.
	West of the A249 the gap includes some individual houses to the east of Bobbing Hill.
Potential for enhancement	Rose Hill woods contain priority habitat deciduous woodland, which should be appropriately managed. There is considerable woodland along the A249 and railway line which soften these transport route. These linear vegetation belts should be maintained. Public rights of way cross the gap and can be enhanced to increase access to and enjoyment of the landscape.
	The recreational value of Grove Park and Rose Hill, a Local Green Space, should be preserved and enhanced where possible.
	Relevant enhancements noted in the LCA include restoring the landscape structure of woodland, hedgerow, orchard, ditches and shelterbelts. and improving the structure of hedgerows and shelterbelts, including along the rural roads.

## **Summary**

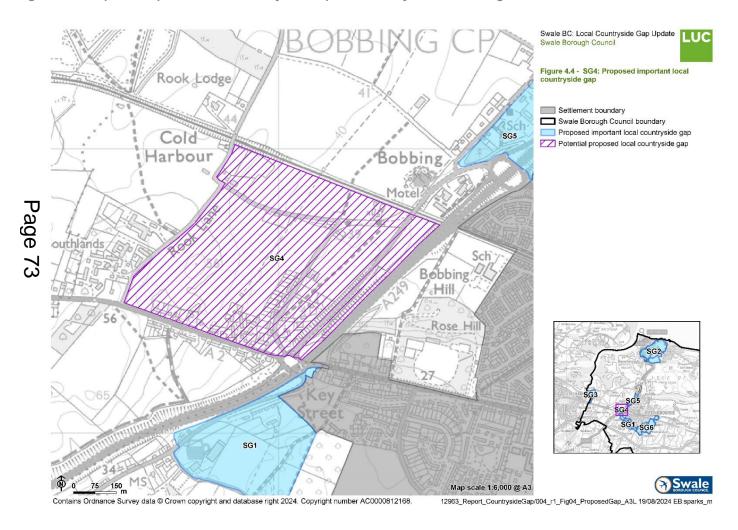
- **3.10** The analysis above indicates the gap between Sittingbourne and Bobbing is a small gap between two settlements. The dual carriageway A249, which is well-wooded forms the main separation between the settlements, as well as the railway line in the north. The vegetation and transport corridors also contribute to the lack of views between Sittingbourne and Bobbing, which reinforces their character as separate settlements.
- **3.11** The undeveloped character of the east of the A249 is partly due to the educational facilities in the north and Grove Park and Rose Hill woods in the south, designated as a Local Green Space. These features are unlikely to change or be developed.
- 3.12 There is no known pressure for development within this gap.

#### Recommendation

It is recommended that this Important Local Countryside Gap is removed. Existing recreational and educational land uses to the east of the A249, and the strong boundary feature of the road itself reinforced by mature vegetation, provide clear separation between the edge of Sittingbourne and Bobbing, which lies north of the railway line. The gap is dominated by the A249 which does not provide a 'countryside' character.

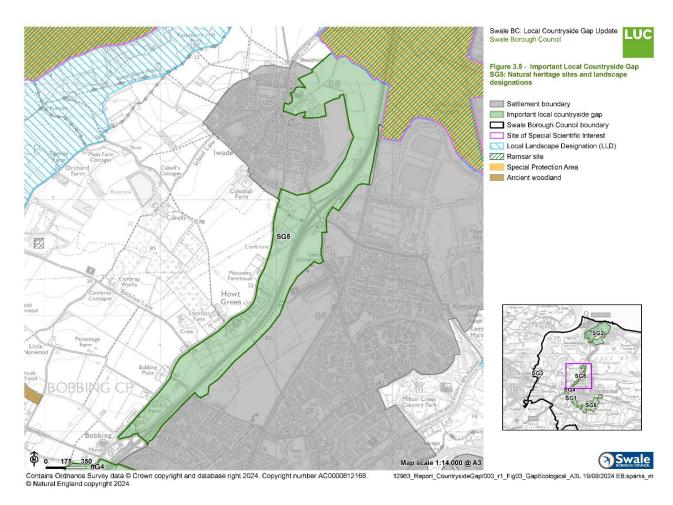
An Important Local Countryside Gap is not required to maintain the separate identities of the settlements, safeguard the open and undeveloped character or prevent encroachment of the rural open character.

Figure 3.16 Proposed Important Local Countryside Gap between Keycol and Bobbing



# SG5: Sittingbourne and the satellite villages of Bobbing and Iwade

Figure 3.17 Natural heritage and landscape designations



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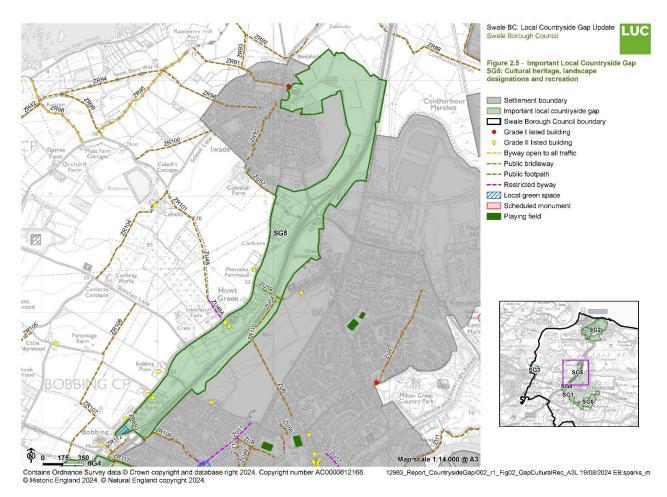
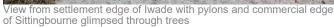


Figure 3.19 Representative photos







Settlement edge of Sittingbourne, with woodland screening the A249 to the west

## Location and extent of area

Table 3.13 Summary of existing gap

SG6: Sittingbourne and the satellite villages of Bobbing and Iwade	
Location and extent of area  The gap lies to the west of Sittingbourne, largely following the A249 with Sheppey Way and Iwade settlement boundary forming the western boundary. The northern boundary follows field boundaries.	
Landscape character context	LCA 24: Iwade Arable Farmlands

Table 3.14 Assessment criteria

Fable 3.14 Assessment criteria		
Assessment criteria	Rating	Commentary
Existing settlement identity and pattern		Sittingbourne
		Sittingbourne was a small market town beside the Roman road of Watling Street, which expanded in the medieval era as a route for pilgrims travelling to Canterbury. This continued into the 18 <sup>th</sup> century as Sittingbourne was an important stopping point on the journey between London and Canterbury. In the 20 <sup>th</sup> century Sittingbourne expanded considerably in all directions. The north-west of Sittingbourne has coalesced with Milton and Kemsley, itself built as accommodation for employees at the Kemsley Paper Mill. The north-west settlement boundary of Sittingbourne lies to the east of the A249. The commercial edge of Sittingbourne lies east of the A249 and railway line.
	Fully meets	Iwade
		Iwade was established in the Medieval era linking Watling Street to the coast. It was a small linear settlement, set along Ferry Road. The village has expanded considerably in the late 20 <sup>th</sup> century, with further expansion east planned. As a result of this, Iwade does not have a particularly strong identity.
		The A249 constructed in the late 1990s provides a barrier between Iwade and Sittingbourne.
		New residential development is under construction along Featherbed Lane, extending the village further south.
		New residential development of up to 466 dwellings has been approved east of Iwade.
		Bobbing

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Assessment criteria	Rating	Commentary
		Bobbing is a very small linear settlement based along Sheppey Way (formerly Ferry Road). It contains a few listed buildings including the Grade I listed Church of St Bartholomew and the 18 <sup>th</sup> century Grade II listed Bobbing Court. There is no Conservation Area. The village lies north of the railway line. In the late 1990s the dual carriageway A249 was constructed to the east of the existing road, providing a barrier between Bobbing and the expanded edge of Sittingbourne.
		West of the A249 and south of the railway line early 20 <sup>th</sup> century linear development lies along Bobbing Hill.
		Bobbing does not have a very strong individual settlement identity. The loss of the gap to the east of the A249 and south of the railway line, would not adversely affect the existing settlement pattern. The transport routes, including the roundabout junction between the A2 and A249, provide a clear barrier between Bobbing and Sittingbourne.  The small linear hamlet of Howt Green lies between Bobbing and Iwade along Sheppey Way. There is considerable ribbon development along Sheppey Way, both residential and commercial.
		The gap between Bobbing and Iwade is weakened by this development.
Landscape character		The gap is linear and is dominated by the A249, a dual carriageway. The road is lined by mature vegetation; however, it is not a rural land use. Small areas of priority habitat traditional orchard are recorded at Howt Green, as well as a small area of priority habitat deciduous woodland.
	Partially meets	Residential and employment development between Sheppey Way and the A249 at Howt Green contribute to the developed character of the landscape. However, this is often set back from the road and views between development to arable fields retains a rural character. A small Local Green Space is designated south of St Bartholomew's Church Bobbing.  There is a more rural character in the gap east of Iwade, with traditional orchard and ponds and arable fields bound by hedgerows.

Assessment criteria	Rating	Commentary
		East of the A249 the gap covers a small strip of arable fields and the roadside vegetation. Recent development at Applegarth Road, off Quinton Road, now extends into the gap. In the north-east, a small part of the Sittingbourne Logistics Park extends into the gap. The hardstanding does not contribute to a rural land use.
Visual character		Vegetation along the A249 restricts views between Iwade and Sittingbourne. There are occasional glimpses of electricity pylons and the roofs of commercial buildings on the edge of Sittingbourne from Iwade.
	Fully meets	Distance and intervening vegetation results in no views between Iwade and Bobbing.
		The open fields to the east of Iwade form part of the rural setting to the village, although there are limited views out from the settlement. It contributes to the sense of separation between the A249 and settlement.

**Table 3.15 Practical considerations** 

Consideration	Commentary
Gap extent	The gap between the north of Sittingbourne and Iwade is 230m. The main route between the settlements is Grovehurst Road / Swale Way. Crossing the A249 via roundabouts creates a clear sense of travelling between two separate settlements. No public rights of way link Sittingbourne and Iwade.
	The gap between Bobbing and Iwade is 2.3km. The main route between the settlements is Sheppey Way. The gap between Bobbing and Sittingbourne is 240m. They are linked by Quinton Road, which crosses over the well-vegetated A249. This creates the experience of leaving one settlement and entering a different settlement. Public rights of way ZR693/ZR108 provide pedestrian access between the settlements. The footpaths follow the junction of the A249, B2006 and Sheppey Way and therefore there is a clear sense of travelling between settlements.
Boundary defensibility	New residential development is under construction to the north of Featherbed Lane, east of Sheppey Way and west of Grovehurst Road. This development is an extension of Iwade, and therefore the land should be excluded from the gap.
	As part of approved residential development of up to 466 dwellings east of Iwade, land between Iwade and the A249, which is partly within the gap, will become a country park. Playing fields/sports pitch are proposed in the south close to the A249/Grovehurst Road junction. Woodland planting both

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Consideration	Commentary
	along the edge of the new development and along the A249 is proposed.
	The existing gap at Iwade follows the settlement boundary and field boundaries, then to the east follows the A249 before following the Sittingbourne settlement boundary. The Sittingbourne settlement boundary however does not always follow physical features on the ground. The gap crosses the A249 at its junction with the B2006. To the west it follows the eastern edge of Swale Way.
	There has been an increase in development within the existing gap at Layfield Farm, Howt Green, and along Bramblefield Way. These reduce the rural character of the gap.
Potential for enhancement	Priority habitat traditional orchard is recorded east of Iwade and at Howt Green. A small area of priority habitat deciduous woodland is also recorded at Howt Green. These priority habitats should be appropriately managed and enhanced.
	There is considerable woodland along the A249 which softens the road. These linear vegetation belts should be maintained. A few public rights of way cross the gap and can be enhanced to shelter them further from the busy dual carriageway and provide access to the wider countryside.
	A Local Green Space is recorded at the junction of the A2, A249 and Sheppey Way. The ecological and recreational value of this area should be preserved and enhanced where possible.
	Relevant enhancements noted in the LCA include restoring the landscape structure of woodland, hedgerow, orchard, ditches and shelterbelts. and improving the structure of hedgerows and shelterbelts, including along the rural roads.

## **Summary**

- **3.13** The analysis above indicates the gap between Sittingbourne and Iwade is linear, mainly focused along the A249. There are a number of development pressures at Iwade, which are within the existing gap. The separation of Iwade and the industrial edge of Sittingbourne is provided by the vegetated A249 dual carriageway. There are also limited views between the two settlements, which contributes to their character as separate settlements. The illustrative masterplan for the approved development east of Iwade shows that land between the new residential edge and the A249 will be in use as a country park, with planting along the settlement edge and the A249. This will form a strong settlement edge to Iwade.
- **3.14** The land east of the A249 and west of the railway line, within the Sittingbourne settlement boundary, is currently in arable use and there are no current development pressures. As this land is within the settlement boundary of Sittingbourne there is no guarantee that this land will remain undeveloped. However, the A249 forms a strong boundary to the settlement edge of Sittingbourne.
- **3.15** The gap between Sittingbourne and Bobbing is largely formed by the A249. The vegetation lining the A249 provides separation between the two settlements. Travelling over or under the A249 on car or foot also provides an experience of leaving one distinct settlement and travelling to another. Residential and commercial development at Howt Green, along Sheppey Way, reduces the perception of a gap. However, the open spaces between the developments reinforces the impression that Howt Green is not a continuation of Bobbing or Iwade.

Swale Important Local Countryside Gaps: SG5 Sittingbourne and the satellite villages of Bobbing and Iwade February 2025

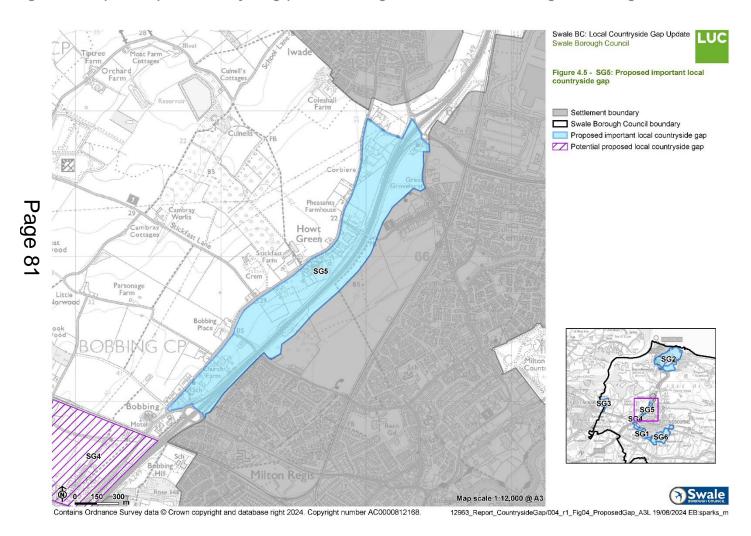
### Recommendation

It is recommended that the Important Local Countryside Gap is retained between Sittingbourne and Bobbing to avoid the coalescence of these settlements. There are rural land uses between Sheppey Way and the A249 which should be retained, although the A249 itself forms a strong physical feature to the settlement edge of Sittingbourne.

It is recommended that the gap covers land up to the new southern boundary of Iwade and that the gap is removed from the east of Iwade. New residential development east of Iwade will provide a country park between the settlement edge and the A249. The A249 is also a strong physical feature retaining separation between Iwade and the commercial edge of Sittingbourne.

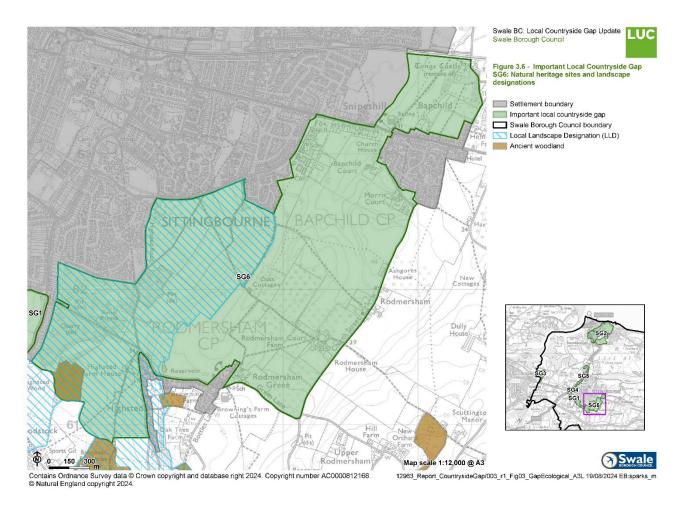
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Figure 3.20 Proposed important countryside gap between Sittingbourne and the satellite villages of Bobbing and Iwade



# SG6: Sittingbourne and the satellite villages of Bapchild, and Rodmersham Green

Figure 3.21 Natural heritage and landscape designations



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Figure 3.22 Cultural heritage and recreation

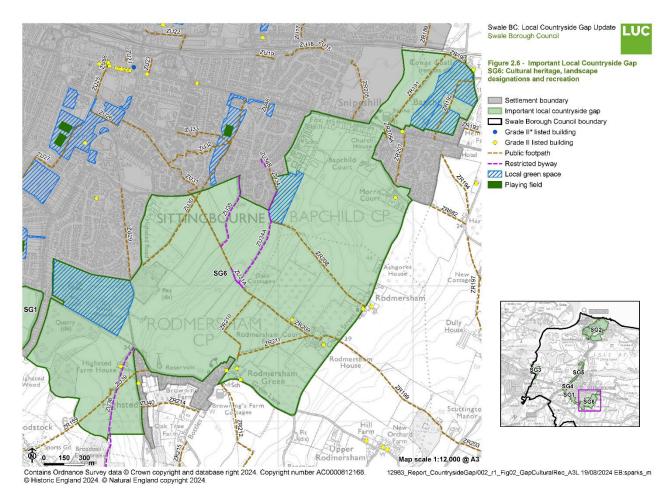


Figure 3.23 Representative photos



Fields north of A2 forming gap between Bapchild and Sittingbourne



Settlement edge of Sittingbourne, development along the A2 and settlement edge of Bapchild seen from ZR208, with Sheppey in the distance

Swale Important Local Countryside Gaps: SG6 Sittingbourne and the satellite villages of Bapchild and Rodmersham Green

February 2025

## Location and extent of area

Table 3.16 Summary of existing gap

SG6: Sittingbourne and the satellite villages of Bapchild, and Rodmersham Green	
Location and extent of area  The gap lies to the east of Sittingbourne, with Church forming the eastern boundary and Green Lane and fiboundaries forming the southern boundary.	
Landscape character context	LCA 31: Teynham Fruit Belt LCA 29: Rodmersham Mixed Farmlands LCA 40: Rodmersham and Milstead Dry Valley LCA 42: Tunstall Farmlands.

Table 3.17 Assessment criteria

Assessment criteria	Rating	Commentary
Existing settlement identity and pattern		Sittingbourne
		Sittingbourne was a small market town beside the Roman road of Watling Street, which expanded in the medieval era as a route for pilgrims travelling to Canterbury. This continued into the 18 <sup>th</sup> century as Sittingbourne was an important stopping point on the journey between London and Canterbury. In the 20 <sup>th</sup> century Sittingbourne expanded considerably in all directions. The south-eastern edge of Sittingbourne is largely contained by Swanstree Avenue and Highsted Road, although development has now breached this boundary.
	Fully meets	Land south of Swanstree Avenue close to Highsted Road has planning permission for up to 135 dwellings.
	r dily mode	Bapchild
		Bapchild was a linear settlement along the A2, which has grown south of the A2 during the 20 <sup>th</sup> century. Bapchild is largely contained by the A2 to the north, although housing extends onto Hempstead Lane north of the A2. Panteny Lane provides the eastern extent and Church Street the western settlement boundary. There are three Listed Buildings on the A2 in the west, and the Grade I listed church of St Lawrence in the southwest. The western settlement edge is contained by Church Street, with the church, Bapchild Court and Morris Court lying west of the road.
		There is linear development along the A2 west of Bapchild, and a large new

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Assessment criteria	Rating	Commentary
		extension to Sittingbourne, currently under construction called Spring Acres. Although this reduces the undeveloped nature of the gap, the land immediately to the east of Spring Acres will be a 'countryside gap', which the approved plans state will act as a permanent buffer between Sittingbourne and Bapchild.
		Bapchild and Sittingbourne are still perceived as distinct separate settlements along the A2 London Road, despite intervening development.
		Rodmersham Green
		Rodmersham Green is a small linear settlement, originally centred on the green, before expanding west along Stockers Hill and Highsted Valley. There are six Listed Buildings within the historic core, which is covered by a Conservation Area. The Grade I listed St Nicholas church lies 1km from the village and is covered by a separate Conservation Area. Rodmersham Green has expanded in the 20th century, to coalesce with Highsted, another linear settlement based along Highsted Road. The village largely retains its linear settlement pattern.  There is a clear sense of separation between Sittingbourne and Rodmersham Green, despite recent developments east of Swanstree Avenue. The Conservation Area Appraisal states that 'Despite [Rodmersham Green's] close proximity to suburban Sittingbourne, it retains a strong and independent sense of
		identity and place'.
Landscape character		Bapchild
	Fully meets	Most of the undeveloped area between Sittingbourne and Bapchild is in agricultural use, generally for arable cropping. Educational facilities lie east of Swanstree Avenue and south of the A2, including playing fields and sports facilities. Housing along the A2 between Sittingbourne and Bapchild slightly reduces the rural character, although there are glimpses of the agricultural land to the south.
		North of the A2 the grassland, local spring and remnant areas of priority habitat deciduous woodland and traditional orchard form part of the

Assessment criteria	Rating	Commentary
		Tonge Country Park, which contains two dedicated Local Green Spaces. There is very limited development within this area.
		Rodmersham Green
		The land between Sittingbourne and Rodmersham is in arable use, bounded by hedgerows. Small areas of orchard are found around Rodmersham Church. Small farms lie west of Church Street, but do not detract from the rural character. Highsted Quarries east of Highsted Road are former quarries which now contain priority habitat deciduous woodland and are designated as a Local Wildlife Site and Local Green Space.
Visual character		Bapchild
		There is no visual relationship between the south of Bapchild and the eastern edge of Sittingbourne due to hedgerow boundaries and undulating topography.
		High roadside hedgerows along Church Street and undulating topography also result in no visual relationship between Bapchild and Rodmersham Green.
	Fully mosts	The settlement edges of Sittingbourne and Bapchild can been seen in views from higher ground to the south, along footpath ZR208.
	Fully meets	Rodmersham Green
		The Rodmersham Green Conservation Area Appraisal notes the strong relationship between the village and its surrounding landscape, with significant views noted north-east and north-west along footpath ZR210, and north-east and north-west from Stockers Hill to the west of the Conservation Area. There is no visual relationship between Rodmersham Green and the south or east of Sittingbourne, due to hedgerow boundaries, areas of traditional orchard and the undulating topography.

**Table 3.18 Practical considerations** 

Consideration	Commentary
Gap extent	Bapchild
	The gap between Sittingbourne and the south of Bapchild is around 420m. The main route between the settlements is the A2 in the north. Development along the A2 including the under-construction development of Spring Acres north of the

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Consideration	Commentary
	A2, and linear development to the southside of the A2 reduces the gap between the settlements to under 100m. The gap along the A2 between Sittingbourne and Bapchild is therefore very important if the separate settlements are to be retained.
	Rodmersham Green
	The gap between Sittingbourne and Rodmersham Green is around 920m. At its closest, the gap between the southern edge of Sittingbourne and the northern edge of Rodmersham at Highsted Hill is 500m. The main route between the settlements is Highsted Road. There is a clear sense of travelling between two settlements along this rural road, partly due to the experience of travelling through the woodland of Highsted Quarries on the edge of Sittingbourne. Public rights of way ZU31 and ZR210 run between Sittingbourne and Rodmersham Green.
Boundary defensibility	Land south of Swanstree Avenue has planning permission for up to 135 dwellings. Although this area is important to the gap between Sittingbourne and Rodmersham Green, development will not so erode the gap as to cause perceived coalescence. The only change to the existing gap is therefore to exclude this land from the gap.
	The gap to the north of the A2 is defined along the western boundary by the extent of Spring Acres, by the railway line to the north and by Church Road and Hempstead Lane to the east. It is recognised this Important Local Countryside Gap does include areas of residential development and educational facilities south of the A2. However, to exclude these areas would weaken the gap in the areas adjacent to the settlements which offer greatest potential for enhancement.
	South of Bapchild the gap follows Church Street and Green Lane. The relationship between Rodmersham Church and the village is important to its character, as set out in the Conservation Area Appraisal.
	The gap follows Highsted Valley and cuts west across the field boundary of orchards, which are important to the rural character of the gap. It then uses field boundaries and the edges of Highsted Wood and Highsted Quarries to meet the settlement edge of Sittingbourne along Ruins Barn Road.
Potential for enhancement	Highsted Quarries LWS lie to the south of Sittingbourne, close to Highsted, designated for its priority habitat deciduous woodland. The former quarries are bound along Highsted Road by barbed wire and concrete posts, which could be removed and replaced with more appropriate boundary treatments such as hedgerows. There is potential for recreational access to the Highsted Quarries, providing this can be balanced with the management of the woodland.
	Highsted Wood ancient woodland lies in the west of the gap and should be appropriately managed.
	Small areas of priority habitat traditional orchard lie west of Church Street at Rodmersham, and at Morris Court south of Bapchild. Conservation and sensitive management of these should be encouraged, and the possibility of extending the

Swale Important Local Countryside Gaps: SG6 Sittingbourne and the satellite villages of Bapchild and Rodmersham Green

February 2025

Consideration	Commentary
	traditionally manged orchards should be explored. Other relevant enhancements noted in the LCAs include restoring and improving the structure of hedgerows and shelterbelts, including along the rural roads.
	The gap contains a number of Conservation Areas at: Tonge, north of Bapchild, Rodmersham Church Street and Rodmersham Green. All the Conservation Areas contain clusters of listed buildings. The setting of all these heritage assets should be enhanced.
	Church Street and Highsted Road are designated as Rural Lanes, which contribute to the rural amenity, nature conservation and character of the landscape. There are opportunities to enhance the rural characteristics of these roads. There are a number of public rights of way in the gap north of Bapchild, between Sittingbourne and Rodmersham and Rodmersham Green, which can be enhanced to increase access to and enjoyment of the countryside.

#### **Summary**

- **3.16** The analysis above indicates the gap between Sittingbourne and Bapchild is a small gap between two distinct settlements, threatened by linear development and coalescence along the A2. The continued expansion of Sittingbourne eastwards means that an Important Local Countryside Gap is still relevant in this location.
- **3.17** The analysis above indicates the gap between Sittingbourne and Rodmersham Green continues to meet the criteria for designation as an Important Countryside Gap. The area has a rural character which separates the two settlements. Rodmersham Green and Sittingbourne have distinct characters and identities, and people travelling between the settlements, whether on foot or by vehicle, have an experience of leaving one distinct settlement and travelling to another.
- **3.18** There are no views between Sittingbourne and Bapchild, Bapchild and Rodmersham Green, and Rodmersham Green and Sittingbourne. This contributes to their character as separate settlements.

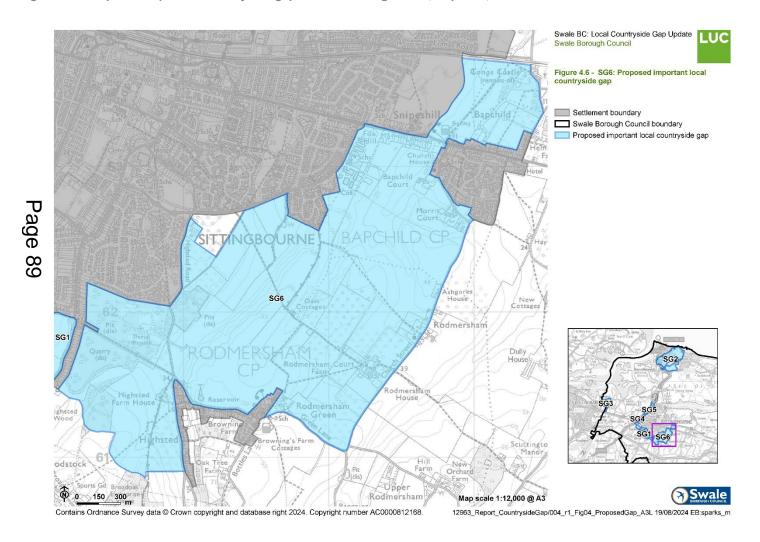
#### Recommendation

It is recommended that the gap is retained at its current extent to avoid the coalescence of Sittingbourne and Bapchild. Although the main threat to coalescence is along the A2 corridor, the proposed gap extends north and south of the A2, to ensure that the settlements remain separate.

It is recommended that the gap is retained at its current extent to avoid the coalescence of Sittingbourne and Rodmersham Green. One small change in boundary is required to take into account the recent planning permission for housing development off Swanstree Avenue.

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Figure 3.24 Proposed important countryside gap between Sittingbourne, Bapchild, and Rodmersham Green



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