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9<sup>th</sup> February 2021

Land at Pump Lane,  
Lower Rainham, Kent

Appeal ref:  
APP/A2280/W/20/3259868

Statement of Common  
Ground  
(Landscape Matters)

Report Number: 13374\_R03d\_RH\_MM

Author: Robert Hughes BSc (Hons)  
PGDipLA CMLI



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# Contents

Section 1: Introduction .....	1
Section 2: Matters in Agreement .....	3
Section 3: Matters in Dispute .....	7
Section 4: Site Visit Itinerary .....	17

# Appendices

- Appendix 1: Agreed Photoviewpoint Locations Plan (13374/P13)
- Appendix 2: Medway Local Plan Extract - Policy BNE34 Areas of Local Landscape Importance
- Appendix 3: Medway Landscape Character Assessment, 2011 Extract – Lower Rainham Farmland Landscape Character Area

# Digital Attachments

- Attachment 1: Video footage from train passing the site to south – Taken in winter and travelling west to east

**Note:**

Video footage issued electronically alongside copy of Landscape Statement of Common Ground Document

# Main Contributors

Robert Hughes BSc (Hons) PGDipLA CMLI – Tyler Grange Group Limited

Jon Etchells MA BPhil CMLI – Jon Etchells Consulting

## Signatures

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Signed on behalf of the Appellant

Signature 

Print Name...Robert Hughes.....

Date.....9 February 2021 .....

Position.....Landscape Witness for the Appellant .....

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Signed on behalf of the Local Planning Authority

Signature 

Print Name...Jon Etchells.....

Date.....9 February 2021.....

Position...Landscape Consultant to Medway Council.....

# Section 1: Introduction

1.1 This Landscape Statement of Common Ground (LSoCG) has been prepared in connection with an appeal by A C Gotham and Sons against the refusal of outline planning permission by Medway Council (the Council) for the development of land at Pump Lane, Lower Rainham, Kent for up to 1,250 dwellings, a local centre, a village green, a two-form entry primary school, a 60-bed extra care facility, an 80-bed care home and associated access (vehicular, pedestrian, cycle). Scale, layout, landscape and appearance are all reserved.

1.2 As set out within the Inspector's Pre-Conference Note and subsequent Case Management Conference Summary Note, the main considerations have been agreed as including the effect of the proposed development on:

*“the character and appearance of the surrounding area, including the Gillingham Riverside Area of Local Landscape Importance and the role of the appeal site as a green buffer”*

1.3 The above relates to the Council's third Reason for Refusal (RfR3), which was:

*“The proposed development would lead to significant long-term adverse landscape and visual effects to the local valued Gillingham Riverside Area of Local Landscape Importance (ALLI), which would not be outweighed by the economic and social benefits of the scheme, in conflict with Local Plan policy BNE34 and NPPF paragraph 170”*

1.4 As set-out in the summary note (paragraph 15) the Inspector considers that it would be beneficial for topic based SoCG to be prepared in respect of each of the main considerations, in order to identify in more detail what is at issue between the parties. It is advised that the SoCG take the form of tables and bullet points to make the basis of differences and the reasons behind them clear. An example was issued by the Inspector of a SoCG for Landscape and Visual Issues<sup>1</sup>: This has been used as a template to inform the structure and content of this LSoCG.

1.5 Within the main consideration relating to landscape, there are three matters:

1. The effect of the proposed development upon the character and appearance of the surrounding area in general
2. Effects on the Gillingham Riverside ALLI and its general functions, as set out in the Local Plan; and

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<sup>1</sup> Land south-east of Williamthorpe Road and west of Tibshelf Road, Holmewood (25<sup>th</sup> August 2020) PINS REF: APP/R1038/W/20/3251224

3. The effect of the proposed development on the specific role of the Appeal Site as a Green Buffer.
- 1.6 Areas of agreement and disagreement for each of these matters are set out separately within this LSoCG.
- 1.7 At Section 2 this document sets out those landscape and visual matters that have been agreed as Common Ground with the Council
- 1.8 Landscape and visual matters in dispute between the Council and the Appellant are set out in Section 3, with the areas of disagreement detailed for each matter in a tabular format.
- 1.9 Finally, at Section 4 a proposed itinerary for the Inspector's Site Visit is set out, with reference to the Viewpoint Locations and views obtained from trains to the south of the Appeal Site.
- 1.10 This Landscape Statement of Common Ground is signed by Robert Hughes of Tyler Grange Group Limited on behalf of the Appellant and Jon Etchells of Jon Etchells Consulting on behalf of Medway Council.

## Section 2: Matters in Agreement

- 2.1 With regard to landscape and visual matters, including the character and appearance of the area and the role of the Appeal Site as a Green Buffer, the following are agreed. These include those matters as agreed within the main SoCG (paragraph 5.1, matters 10, 11 and 12)
- 2.2 The Agreed Photoviewpoints Location Plan at **Appendix 1** illustrates the photoviewpoints contained within the Tyler Grange LVIA that are agreed as being representative of views of the Appeal Site for the purposes of landscape and visual assessment. These include additional viewpoints (4a and 15a) as agreed with the Council.

### The Character and Appearance of the Area

1. The site is located within the Gillingham Riverside Area of Local Landscape Importance (ALLI), situated on land extending from the railway line on the edge of Twydall to the south to Lower Rainham Road to the north. Lower Bloors Lane bounds the site to the south east. Lower Twydall and agricultural land lie to the northwest and west of the site
2. The Gillingham Riverside ALLI is a non-statutory, local designation which provides protection at a district level and is a more local level of designation than Special Landscape Areas which are of countywide significance.
3. The Appeal Site is situated within a locally valued landscape within the context of paragraph 170a of the NPPF.
4. The Appeal Site is situated within the 'Lower Rainham Farmland' Landscape Character Area as identified by the Medway Landscape Character Assessment, 2011 (see 2011 LCA extract at **Appendix 3**).
5. The area to the north of Lower Rainham Road lies within the 'Riverside Marshes' Landscape Character Area. As recognised by the Medway Landscape Character Assessment, the LCA in proximity to the Appeal Site includes the following:
  - *Saxon Shore way forms strong east/west link along the sea wall; weaker north south links;*
  - *Much of area owned by Medway Council and managed as country park with Visitor Centre and Car Park – introduces amenity element rather than distinctly rural character;*

- *Long views and open character in views out to the estuary from the sea wall, stronger sense of enclosure to interior;*
  - *Forms an important buffer to the edge of Gillingham, protects Natura 2000/Ramsar sites, provides a valuable recreational and biodiversity resource, green corridor from countryside into urban area”*
6. Linear settlement at Lower Rainham and along Lower Rainham Road, the road itself, trees and mature hedgerows provide some physical and visual separation between the Appeal Site and Riverside Marshes and shoreline to the north.
  7. The Appeal Site is generally well contained by mature vegetation including woodland and tall hedgerows, limiting the available views and extent of visibility. There are limited publicly available views into and across the site, but there are some views from the adjoining lanes, from Pump Lane which passes through the site and from the bridleway which runs across its eastern part.
  8. Views across the Appeal Site from trains passing to the south are generally screened and filtered by trackside trees and vegetation. Outward views across the site are glimpsed through breaks in vegetation and are fleeting, but there are some clear views to the estuary, especially in the winter.
  9. In views inland from Motney Hill, Horrid Hill and the northern shore of the estuary, the Appeal Site is set beyond vegetation and trees to the shoreline, and development and hedgerows along Lower Rainham Road. In these views the urban edge at Twydall forms a developed backdrop on the rising land to the south of the Appeal Site, with the urban area of Rainham and Gillingham beyond, but the site can still be seen extending across the view.
  10. The structural landscaping to the site boundaries and trees within areas of Green Infrastructure throughout the development and along streets would over time provide some softening of views from the north, noting that the proposed buildings would be up to 12m in height.
  11. Details of the proposed access arrangements from Lower Rainham Road and Pump Lane are illustrated on a set of drawings prepared by David Tucker Associates (DTA) contained at Appendix E of the Transport Assessment Addendum (Appendix 10.1 of the Supplementary Environmental Statement - CD8.4).

Based upon these drawings, indicative lengths of hedgerow that would be required for removal to create the proposed access points include:

- Lower Rainham Road – (DTA drawing 20230-05-2E): 150 linear metres
  - Pump Lane –Northern Junction (DTA drawing 20230-05-6E): 70 linear metres
  - Pump Lane - Southern Junction (DTA drawing 20320-05-5E): 105 linear metres
12. There are opportunities for the early replacement of removed lengths of hedgerow with native hedging, behind the visibility splays. The proposals include for the replanting of removed lengths of hedgerow and provision of landscape buffers to site boundaries and along Pump Lane incorporating trees, hedgerows and traditional orchards.
13. The following views are representative of views of the Appeal Site for the purposes of landscape and visual impact assessment and are illustrated on the Agreed Photoviewpoint Locations plan at **Appendix 1**. These include those within the LVIA prepared by Tyler Grange that were agreed with Jon Etchells on behalf of the Council. Photoviewpoints 4a and 15a have been suggested as additional views by Jon Etchells:

<b>Photoviewpoint No.</b>	<b>Visual Receptors and Locations</b>
	<b><i>Users of the Saxon Shore Way</i></b>
PVP1	<i>Northern shore of the Medway Estuary</i> Public Footpath ref. Strood Rural/ Peninsula RS93 between Hoo Marina Park and Kingsnorth Power Station, looking south
	<b><i>Visitors to the Riverside Country Park and Users of the Saxon Shore Way</i></b>
PVP2	<i>Horrid Hill</i> From the path on the southern edge of the Horrid Hill promontory, looking southeast
PVP3	From the viewing mound north of the café car park, looking southeast
PVPs 4 & 4a	<i>South of Motney Hill</i> Views from the Saxon Shore Way and Motney Hill looking southwest
PVP5	<i>North of Lower Rainham</i> From Public Footpath ref. Gillingham North / Rainham North GB1
	<b><i>Users of Lower Rainham Road</i></b>
PVP6	At the junction with Lower Bloors Lane, looking west
PVP7	At the Junction with Pump Lane, looking southwest
PVP8	From Lower Rainham Road, opposite the property northwest of the Appeal Site, looking southeast
	<b><i>Users of Lower Bloors Lane</i></b>
PVP9	Opposite entrance to Cherry Orchard Farm, looking west
PVP10	Opposite Bridleway and entrance to Bloors Lane Community Woodland, looking southwest along the lane
PVP11	On the railway footbridge, looking northwest along the railway corridor
	<b><i>Users of Lower Twydall Lane</i></b>
PVP12	At the junction with Grange Road, looking southeast



PVP13	On the railway footbridge, looking east
	<b><i>Users of Bridleway GB6a</i></b>
PVPs 14a & 14b	At gateways into fields of commercial orchard looking southwest (PVP14a) and northeast (PVP14b)
PVPs 15 & 15a	Views through gaps in trackside tree belt and hedgerows looking northwest (PVP 15) and northeast (PVP 15a)
	<b><i>Users of Pump Lane</i></b>
PVP16	From opposite Pump Farm, looking southwest
PVP17	From the lane between the railway line and Russet Farm, looking northeast
PVP18	From the residential street south of the railway line, looking north
	<b><i>Residents of Properties adjacent to and overlooking the site</i></b>
PVP19	From Gifford Close south of the railway, looking northeast

## The Functions of the ALLI and Role of the Appeal Site as a Green Buffer

1. The function of the ALLI as a green buffer does not relate to the quality of the landscape, though it is described within Local Plan Policy BNE34 as a '*Rural landscape of orchards and arable fields with country lanes*'.
2. The role of the ALLI as a green buffer is to separate built up areas from the areas of importance for nature conservation and recreation that are situated along the Medway Estuary.
3. Public Access across the Appeal Site is currently limited to that along the bridleway which connects Lower Bloors Lane and Pump Lane, but Lower Twydall Lane and Lower Bloors Lane to the north west and south east of the site, and also Pump Lane which runs through the site provide connectivity between the urban area and the shoreline.
4. The Appeal Site helps to provide an agricultural setting to the two Conservation Areas which adjoin it.
5. The Appeal Site does not include any land that is within the Riverside Country Park.
6. The Proposed Development would increase accessibility to the shoreline and Country Park from the urban areas of Rainham, Twydall and Gillingham. This would be through areas of Green Infrastructure that run through the Appeal Site alongside Pump Lane connecting with Lower Rainham Road and the Country Park to the north. These areas would incorporate community orchards, a village green and areas of public open space set within green corridors and landscape buffers.

7. The Proposed Development would have no direct impacts upon the land north of Lower Rainham Road, including the Country Park, protected biodiversity sites and public rights of way.

## Section 3: Matters in Dispute

- 3.1 The areas of disagreement between the Appellant and the Council in relation to landscape matters are set out below. The reasoning for each is provided from both the Appellant and the Council.
- 3.2 As set-out in the Main SoCG (paragraph 6.1, bullet 2), those matters in dispute in relation to landscape can be divided into four main areas:
1. The effect of the Development on the character and appearance of the surrounding area in general;
  2. Effects on the Gillingham Riverside Area of Local Landscape Importance and its stated functions;
  3. The specific role of the Appeal Site as a green buffer; and
  4. The weight to be given to the Development's impacts.
- 3.3 The weight to be given to the landscape and visual impacts of the development is to be considered in evidence relating to Planning Matters, leaving the first three matters to be considered below.

### 1. The Character and Appearance of the Area

<b>1A The sensitivity of the landscape to the proposed development</b>	
<b><i>Appellant</i></b>	<b><i>Medway Council</i></b>
The Tyler Grange LVIA includes a site-specific assessment of Local Landscape Character Areas (LLCAs).	JE evidence includes an assessment of local landscape character (para 3.4.16), covering the area within the visual envelope shown on Figure 4.
The assessment places the Appeal Site within the 'Lower Rainham and Lower Twydall Fruit Belt' LLCA south of Lower Rainham Road. This LLCA is considered by the appellant to be of a medium landscape sensitivity to residential development.	The area of and immediately around the site is an agricultural landscape dominated by orchards, which are recognised as being characteristic landscape character assessments at all scales. This area is considered to be of medium to high sensitivity to development of the type proposed (para 3.5.6).

<p>The area is influenced by the settlement edge at Twydall and has an urban fringe character and is of a medium susceptibility. Landscape Quality varies, with commercial orchards and paddocks across much of the area replacing traditional land uses and field patterns.</p>	<p>The local area is influenced by the urban edge to some extent, but the railway line forms a visual and physical barrier, and the proposals would extend the urban area into the countryside beyond it occupying an area which at the moment comprises mainly orchards and which forms a significant part of the remaining area of open countryside between the urban area and the estuary at this point.</p>
<p>There is poor connectivity and recreation value across much of the area.</p>	<p>There are relatively few Public Rights of Way within the local area, but there is a bridleway through the eastern part of the site and the long distance Saxon Shore Way along the shoreline to the north, and Lower Twydall Lane and Lower Bloors Lane (alongside the site) and Pump Lane (though its centre) provide connectivity between the urban area and the estuary.</p>

**1B The extent of harm\* to local landscape character**

\*See Tyler Grange LVIA Appendix 2 Table 5 and JE Appendix E Table 6 for explanation of the terms 'moderate adverse' etc mean.

<b><i>Appellant</i></b>	<b><i>Medway Council</i></b>
<p>The appellant considers that at Year 1 there would be moderate / major adverse landscape effects within the site and moderate adverse effects upon the Lower Rainham and Lower Twydall Fruit Belt Local Landscape Character Area (LLCA) within which the site is situated.</p> <p>By Year 15 these would reduce to moderate adverse effects at the site wide scale and for the Lower Rainham and Lower Twydall Fruit Belt LLCA</p>	<p>There would be high adverse landscape effects in Year 1 within the site itself and moderate to high adverse effects on the local landscape, as the character of the local landscape would change completely, from being a pleasant, largely rural area dominated by orchards to a new residential area with an urban character.</p> <p>Effects in Year 15 would reduce to moderate to high adverse for the site and moderate adverse for the local area.</p>

as areas of green infrastructure, open spaces, community orchards and mitigation planting matures.	
There would be residual localised indirect and minor adverse effects on the Medway Shoreline and Riverside Country Park LLCA resulting from the proposals. This relates to development and site forming part of the backdrop as experienced from Motney Hill and Horrid Hill within the LLCA.	Effects not assessed separately.
Within the wider Study Area, the proposed development would not be inconsistent with the pattern and extent of development at Gillingham which extends to the shoreline, and at Rainham which extends to Lower Rainham Road at Berensgrave.	Existing development does extend to or beyond the line of Lower Rainham Road to the west and east of the site, but in the area of and around the site it is contained to the south by the railway line, and the Appeal development would represent a significant incursion of urban development into what is at the moment a largely rural area.

**1C The visual effects of the proposed development and extent of harm to visual amenity**

*Note: Summary of effects set out below are for both year 1 and year 15 after completion*

<b>Appellant</b>	<b>Medway Council</b>
The appellant considers that the proposed development will result in relatively limited visual effects. This is due to the containment of the Appeal Site in views from local roads and public rights of way and urban fringe context within which the proposals would be experienced.	Visual effects would be limited by the generally contained nature of the site, but there are some views from the adjoining lanes, from Pump Lane as it passes through the site and from the bridleway which runs across its eastern part, as well as views from adjoining properties - in many of these views the new development would replace existing views across the orchards.
There would be beneficial effects on the visual amenity of users of Bridleway GB6a within the site, reflecting the opening up of views and integration of the right of way within the green infrastructure and areas of	There would be high adverse visual effects for users of the bridleway in year 1 - this is a rural route, partly enclosed but with some open and attractive views across the orchards - its enclosure by new residential

<p>open space, linking with recreation routes and the right of way network, as well as community spaces including the village green, orchards, play areas and pocket parks.</p> <p>At year 1, upon completion, these would be of a localised, minor beneficial effects, increasing to minor / moderate beneficial by year 15 as the landscape establishes.</p>	<p>development (even allowing for areas of open space alongside the route within that development) and the need to cross a new road would not result in any kind of benefit, even in year 15 when effects would persist at a moderate to high adverse level.</p>
<p>In views from the Saxon Shore Way at Motney Hill and within the Country Park at Horrid Hill, development would be set beyond vegetation along the shoreline, with landscape buffer planting softening the built edge and retaining a green backdrop. These are part of expansive views across the estuary.</p> <p>In views from Motney Hill and Horrid Hill there would be up to a medium magnitude of change for receptors of a medium / high sensitivity, resulting in minor / moderate adverse visual effects at year 1. This would reduce to minor adverse by year 15.</p> <p>Where there are views towards the site from the Saxon Shore Way north of Lower Rainham, there would be a low magnitude of change and minor adverse visual effects at year 1, reducing to negligible by year 15. Views of the proposed development would be limited to the roofs of houses on the higher ground within the site. These would be softened and filtered by the structural landscape planting to the site boundaries as the trees mature.</p>	<p>There would be some views for users of the Saxon Shore Way as it runs through the Riverside Country Park, and in some of those views the roofs of new houses within the site would be visible, in particular in views from the south side of Motney Hill, and (to a lesser extent) from Horrid Hill. There would be up to a medium degree of change for receptors of high sensitivity, and moderate to high adverse visual effects for those sections of the route with the most open views to the site in year 1, declining to moderate adverse by year 15.</p>
<p>Users of Lower Rainham Road would experience a low / medium magnitude of change at year 1 and minor adverse visual</p>	<p>There would be moderate to high adverse effects for non-motorised users of Lower Bloors Lane and Lower Rainham Road in</p>

<p>effects. This reflects the localised impacts when heading towards and leaving Lower Rainham. With maturation of landscape planting at the site entrance and buffer to the northern boundary, at year 15 there will be minor adverse visual effects.</p> <p>Users of Lower Twydall Lane and Lower Bloors Lane would experience minor to moderate adverse effects at year 1, reducing to minor adverse at year 15. The retention of hedgerows and enhancement of planting to boundaries with landscape buffers would minimise visual impacts.</p>	<p>year 1 - at Lower Rainham Road there would be significant loss of the roadside hedge, views into the site along the proposed access and also where the existing hedge would need to be removed. All effects would tend to decline over time, with slight to moderate adverse effects for non-motorised users of Lower Bloors Lane and Lower Rainham Road in year 15.</p>
<p>Users of Pump Lane would experience a medium magnitude of change and moderate adverse visual effects at year 1, reflecting the change associated with the new accesses and housing.</p> <p>Development would be set back from the lane beyond area managed as community orchards, the village green and open space. At year 15, the maturation of planting would reduce the visual effects to minor / moderate adverse.</p>	<p>High adverse effects for non-motorised users in year 1 - there would be a high degree of change around the areas of the two proposed junctions, where the character of the lane itself would change completely and where there would also be views of the new houses and other uses in the adjoining parts of the site. Effects would tend to decline over time, with moderate adverse effects for non-motorised users in year 15.</p>
<p>There would be moderate / major adverse effects on the visual amenity of residents of properties on Pump Lane, including Russett Farm at year 1.</p> <p>With the maturation of planting, establishment of community orchards and green infrastructure and landscape buffers, this will reduce to moderate adverse visual effects by year 15.</p>	<p>There would be up to high adverse visual effects in year 1 for some properties at Russett Farm which would lose their present open and attractive views across the orchards. Effects would reduce to moderate adverse by year 15, but the loss of the open views would be a permanent effect.</p>

## 2. Effects on the Gillingham Riverside ALLI and its stated functions

<b>2A Enhances the setting of the Medway Towns Northern Ring Road on the west boundary, and allows attractive views from the river and railway.</b>	
<b><i>Appellant</i></b>	<b><i>Medway Council</i></b>
The Appeal Site does not lie adjacent to the northern ring road nor enhance its setting, being physically and visually separated from the road and adjacent land.	The development would have no significant effects in terms of the setting of the ring road, as it is some distance from it.
Views across the Appeal Site from the railway are screened by lengths of trackside trees and hedges and filtered by vegetation, with fleeting glimpsed views when passing over the Pump Lane railway bridge.	Views from the railway line are filtered to some extent, but there are also some clear views (JE Photograph 40) in which the orchards extending across the site can be clearly appreciated.
Views from the shoreline within the ALLI include expansive views across the estuary. Views inland are softened and filtered by tree belts and vegetation along the shoreline, with limited and glimpsed views towards the Appeal Site. In views from Horrid Hill and Motney Hill the site is set beyond and contained by trees and hedgerows, set against the backdrop of development at Twydall.	Views from the estuary and Motney Hill and Horrid Hill to the north would be significantly affected - the roofs of new buildings within the site would extend across the view, and the function of the ALLI in this respect would be significantly harmed.

<b>2B Provides residents within an extensive urban area with access to an attractive, rural landscape.</b>	
Public access across the Appeal Site is limited to that along Bridleway GB6A which crosses the site between Lower Bloors Lane and Pump Lane and is enclosed by mature coniferous tree belts and hedges, with limited outward views.	The bridleway forms the only physical access into the site and is enclosed for some of its length, but there are open and attractive views of the orchards from it, as well as views into the site from the adjoining lanes.
The proposals include extensive areas of connected new publicly accessible green space, including community orchards,	There would be increased opportunities for access through the site, but that access would no longer be within 'an attractive,



<p>village green, linear parks and recreation routes. These spaces would link with the existing rights of way to enhance access to areas of multifunctional green and blue infrastructure and the wider landscape including the shoreline and Riverside Country Park within the wider ALLI.</p>	<p>rural landscape’, as the price of the enhanced access would be the loss of that landscape and its replacement with an extensive new urban area. The function of the ALLI in this respect would therefore be harmed.</p>
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**2C Provides an attractive setting to the Lower Rainham and Lower Twydall conservation areas**

<p>Matters relating to Heritage Matters, including the setting of the conservation areas are considered within evidence prepared by Gail Stoten on behalf of the appellant.</p>	<p>Effects on the Conservation Areas as heritage assets are considered in the evidence of Kit Wedd.</p>
<p>The ALLI includes land surrounding both conservation areas and not just that within the Appeal Site. The site therefore only forms part of the landscape setting to the conservation areas.</p>	<p>In landscape terms, the site makes a limited contribution to the setting of the Lower Twydall Conservation Area, but a more significant contribution to the setting of the Lower Rainham Conservation Area. The proposals allow for some landscaped areas between the proposed built development and the Conservation Areas, but they would still lose aspects of their presently largely rural settings, and there would be some harm to the function of the ALLI in this respect. The overall settlement of Lower Rainham would effectively become part of the expanded urban area, and would largely lose its present identity and character.</p>
<p>Within the Appeal Site, land adjoining both conservation areas is currently managed as commercial orchards.</p>	<p>All agricultural land uses are commercial to some degree and the present orchards do provide an attractive setting.</p>
<p>The proposal sets development back from the conservation areas beyond landscape buffers incorporating structural planting, native tree and hedgerow planting, grassland, swales and ponds.</p>	<p>Acknowledged, as above.</p>

<b>2D Contains a number of orchards, mature hedgerows and farm groups complementing and contributing to the Riverside Country Park.</b>	
The Appeal Site does not lie within the Country Park or make any direct contribution to it.	Agreed, but the site does comprise a rural, largely undeveloped area adjacent to the Country Park.
Orchards within the Appeal Site comprise commercial intensively managed fields that do not reflect the traditional orchard character.	The orchards within the site are typical of modern fruit growing areas and do reflect the history and tradition of fruit growing in this area.
The proposal would retain Pump Farm and properties at Russett Farm within a traditional orchard setting.	The site contains almost all of the orchards within the ALLI, and almost the entire area of orchards would be lost, and replaced with a new urban area. The function of the ALLI in this respect would therefore be significantly harmed.

<b>2E Forms a green backdrop when viewed from the Medway Estuary.</b>	
<p>Trees and vegetation along the shoreline form a green backdrop to the estuary. Hedgerows and trees to field boundaries and local roads also contribute to the backdrop.</p> <p>The built edge at Twydall and Rainham which extends along the railway line and slopes to the south provides a developed backdrop to land beyond the shoreline.</p>	<p>The site makes up around half of the width of the ALLI when viewed from the estuary and from Motney Hill. In these views it forms a narrow band between the urban edge on higher ground beyond the railway line and the trees and scattered properties along Lower Rainham Road and closer to the shore line, and the upper parts and roofs of the new development (noting that at least some of the new houses would be 3 storeys in height) would be apparent across the view, and much of the green backdrop would be lost. The function of the ALLI in this respect would therefore be significantly harmed.</p>
<p>The proposed structural landscape planting to reinforce the site boundaries set within areas of open green spaces and lining streets and roads within the scheme would reinforce the containment of the Appeal Site in the landscape.</p>	
<p>Trees across the proposal would provide a green canopy that would soften and break up the development and linear edge of Twydall along the railway line, contributing to the green backdrop.</p>	

### 3. The Role of the Appeal Site as a Green Buffer

<b>1. 3A The extent that the site functions as a Green Buffer within the Gillingham Riverside ALLI</b>	
<b><i>Appellant</i></b>	<b><i>Medway Council</i></b>
The appellant considers that the Appeal Site makes a limited contribution to the function of the ALLI as a Green Buffer.	The Appeal Site makes a significant contribution - in terms of extent alone it forms around 75% of the width of the buffer along the line of Pump Lane.
The Council have consented development within the ALLI on land off Station Road and Berengrave Lane which has extended the built edge of Rainham as far north as Lower Rainham Road.	This development is to the south east of the site. In the area of and immediately around the site the urban edge runs to the south of the railway line, apart from the ongoing development alongside Berengrave Lane which is separated from the site by the Community Woodland.
The ALLI continues to function as a green buffer north of the Lower Rainham Road, with agricultural fields and pasture within the Riverside Marshes and vegetation along the shoreline providing separation between settlement and areas of nature conservation and recreation value along the estuary.	Part of the ALLI does lie to the north of Lower Rainham Road, but if the development proceeds the width of the ALLI would be reduced at this point by around 75%.
The Appeal Site is physically and visually separated from the estuary by the Riverside Marshes north of Lower Rainham Road and vegetation along the shoreline. Development of the Appeal Site would not lessen the green buffer between Lower Rainham Road and the estuary.	Part of the ALLI does lie to the north of Lower Rainham Road, but if the development proceeds the width of the ALLI would be reduced at this point by around 75%. The remaining green buffer to the north of Lower Rainham Road would be a single field and some vegetation along the shoreline, measuring around 240m in width.
Development at Lower Rainham, Berengrave, Sharps Green and Mariners Farm extend settlement beyond the Appeal Site and towards the estuary to the north, placing the site within the extents of the northern edge of Rainham and the built edge.	These areas are to either side of the site - in the area of and immediately around the site the urban edge runs to the south of the railway line, apart from the ongoing development alongside Berengrave Lane which is separated from the site by the Community Woodland. The fact that

	development extends further to the north to each side of the site does not lessen the importance of retaining the area of and around the site as open and undeveloped.
The Appeal Site is well contained by hedgebanks, hedges and tree belts. Combined with the lack of public access, the site is not perceived as providing a substantial green buffer as experienced from adjacent public roads and rights of way.	The site is reasonably well contained, but there are some generally attractive views across it from Pump Lane and the bridleway across its eastern part, in which its open and undeveloped nature can be appreciated. Notwithstanding that, the green buffer function is one of separation, and does not rely on there being views of the land which provides that separation.

<b>3B The impacts of the proposed development upon the function of the ALLI Green Buffer</b>	
<b><i>Appellant</i></b>	<b><i>Medway Council</i></b>
The appellant considers that the proposed development has a localised impact on the function of the wider Gillingham Riverside ALLI as a green buffer. The proposals incorporate measures to create new accessible green space and areas of strategic landscape mitigation planting that would enhance the function of the ALLI and provide green corridors connecting Twydall and Rainham with the recreational resources and landscape of the estuary and shoreline.	The site forms a significant proportion of the area of the ALLI, and extends for up to 750m from the edge of Twydall along the railway line to Lower Rainham Road. The proposed large scale built development within the site, extending from the railway line to Lower Rainham Road, would significantly affect the green buffer function of the ALLI.
The proposed development would retain a green buffer between the estuary and associated areas of nature conservation and recreation value and the settlement edges at Rainham and development along Lower Rainham Road. The buffer includes tree belts and vegetation along the shoreline and Riverside Marshes farmland and land within the Riverside Country Park.	Part of the ALLI does lie to the north of Lower Rainham Road, but if the development proceeds the width of the ALLI would be reduced at this point by around 75%. The remaining green buffer to the north of Lower Rainham Road would be a single field and some vegetation along the shoreline, measuring around 240m in width.

<p>The proposals would retain and enhance landscape planting to the site boundaries, including along Lower Rainham Road and within landscape buffers and green spaces incorporating trees and orchards at the site entrance and along the northern edge of the development.</p>	<p>There would be significant loss of the roadside hedge along Lower Rainham Road. The presence of some new open space and planted areas would not compensate for the significant loss of open land within the ALLI.</p>
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## Section 4: Site Visit Itinerary

- 4.1 The Agreed Photoviewpoint Locations plan at **Appendix 1** (drawing 13374/P13) illustrates the Photoviewpoint Locations included within the LVIA prepared by Tyler Grange (Environmental Statement – Appendix 11.1) with additional viewpoints provided by Jon Etchells (Viewpoints 4a and 15a). It is proposed that the plan be used to inform the suggested route for the Inspector’s site visit. It is acknowledged that the site visit itinerary and associated viewpoints and views may evolve as the Inquiry proceeds.

### Itinerary

- 4.2 A suggested itinerary for the site visit is set out below:

#### **Riverside Country Park and Saxon Shore Way**

1. Starting at the visitor centre / café car park, head to viewing mound (Viewpoint 3) and north to the shoreline.
2. Walk along the causeway at Horrid Hill (Viewpoint 2).
3. Travel east along the Saxon Shore Way towards Bloors Wharf (Viewpoint 5).
4. If continuing on foot, head east towards Motney Hill. Otherwise, head back along shoreline to Country Park car park.

#### **Motney Hill**

5. Visit viewpoints 4 and 4a. Accessible along Saxon Shore Way. There is a car park at Motney Hill Reserve. Parking is also possible by Viewpoint 4.

#### **Lower Rainham and Lower Bloors Lane**

6. Park on Lower Rainham Road near junction with Lower Bloors Lane (Viewpoint 6).
7. Walk along Lower Bloors Lane to junction with Bridleway GB6a opposite Bloors Lane Community Woodland (Viewpoint 10).

#### **Bridleway GB6a**

8. Walk along Bridleway from Lower Bloors Lane to Pump Lane (Viewpoints 14a & 14b, and 15 & 15a)

NOTE: Potential opportunities to access Appeal Site from bridleway (gates at viewpoints 14a & b)

#### **Pump Lane**

9. Walk along Pump Lane towards Lower Rainham (Viewpoints 16 and 17) - note areas of lane subject to works for the two new junctions

NOTE: No pavements along Pump Lane for safe pedestrian access. May be an opportunity to park at yard on the Appeal Site, north of Pump Farm to access Pump Lane and bridleway.

### **Lower Rainham**

10. Route along Lower Rainham Road to include junctions with Pump Lane and Lower Bloors Lane and proposed site access (Viewpoints 6, 7 and 8) - note point of proposed access and consequent hedgerow loss.

### **Lower Twydall**

11. Access onto Lower Twydall Lane from car park south of railway footbridge (Viewpoint 13) - note views from the footbridge
12. Walk along Lower Twydall Lane to junction with Grange Road (viewpoint 12) NOTE: Parking also possible on Grange Road adjacent to viewpoint.

### **Twydall**

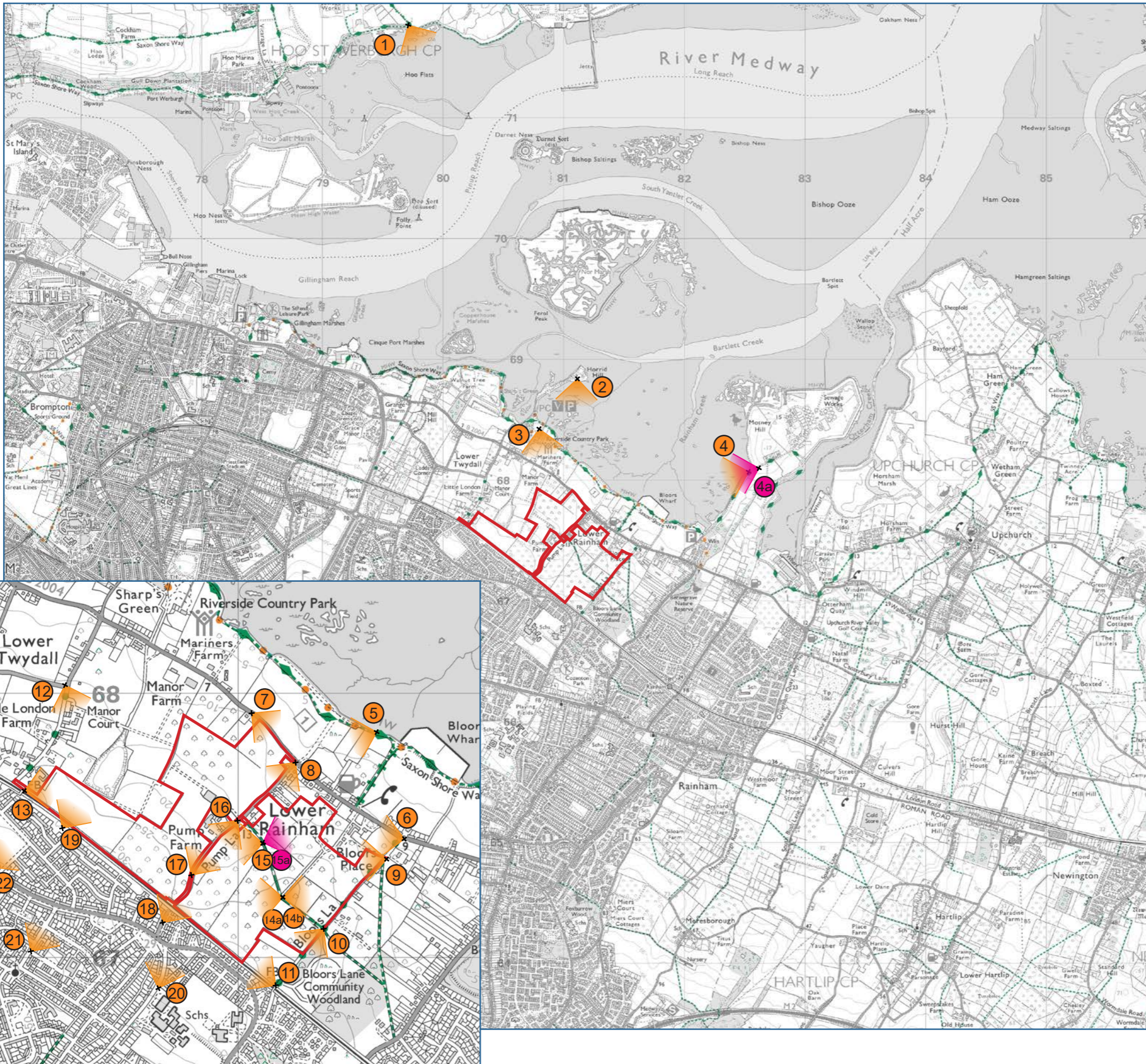
13. Viewpoints in Twydall all accessible by car (Viewpoints 18 -22)









## **Views from Trains**

- 4.3 In addition to the viewpoints illustrated on the viewpoints plan, a video of winter views obtained from trains passing the site Appeal Site to the south and entering Rainham Station has also been submitted as a digital .MOV file alongside this LSoCG.
- 4.4 This provides the Inspector with the opportunity to understand the context within which the Appeal Site is viewed from trains without the need for travelling on public transport and maintaining social distancing as part of an accompanied site visit.

# **Appendix 1: Agreed Photoviewpoint Locations Plan (13374/P13)**





-  Site Boundary
-  Footpath
-  Bridleway
-  Recreational Route
-  Other Routes with Public Access
-  Traffic-free Cycle Route
-  Viewpoints
-  Jon Etchell's Additional Viewpoints



Project Land off Pump Lane, Lower Rainham

Drawing Title **Agreed Photoviewpoint Locations**

Scale Not to Scale

Drawing No. 13374/P13

Date January 2021

Checked KL/RH





# **Appendix 2: Medway Local Plan Extract - Policy BNE34 Areas of Local Landscape Importance**

- (iii) The cost and availability of alternative sites or other means of meeting the need,*
- (iv) Any detrimental impact on the environment or landscape,*
- (v) The environmental standard of the proposed construction or restoration.*

## **Special Landscape Areas**

3.4.103 Attractive landscapes of countywide significance are classified as Special Landscape Areas (SLAs) under policy ENV4 of the Kent structure plan. In Medway there are two SLAs, the North Downs and the North Kent Marshes, with the former being contiguous with the Kent Downs AONB. The council will aim to protect the natural beauty of these areas. Development which undermines this aim will only be considered if significant social or economic benefits would result. These social or economic benefits would be expected to have a countywide significance.

### **POLICY BNE33: SPECIAL LANDSCAPE AREAS**

*Development within the North Downs and the North Kent Marshes special landscape areas, as defined on the proposals map, will only be permitted if:*

- (i) it conserves and enhances the natural beauty of the area's landscape; or*
- (ii) the economic or social benefits are so important that they outweigh the county priority to conserve the natural beauty of the area's landscape.*

## **Areas of Local Landscape Importance**

3.4.104 There are several areas of landscape that enhance local amenity and environmental quality, providing an attractive setting to the urban area and surrounding villages. These locally significant landscapes are shown on the proposals map as Areas of Local Landscape Importance (ALLIs). Some of these areas form part of the green hillsides and backdrops of the urban area, which are recognised in the Thames Gateway Planning Framework as a particularly important environmental resource.

3.4.105 These ALLIs are significant not only for their landscape importance, but also for other important functions:

- (i) As green lungs and buffers, helping to maintain the individual identity of urban neighbourhoods and rural communities;
- (ii) As green corridors (or links) for the community to reach the wider countryside;
- (iii) As edge or “fringe” land, needing protection from the pressures of urban sprawl; and
- (iv) As habitats for wildlife and corridors, along which wildlife from the wider countryside can reach the urban environment.

3.4.106 There is therefore a need to protect the landscape character and functions of each of the designated ALLIs.

3.4.107 Justification for designating each ALLI is set out below. This provides guidance on the landscape features and functions that the council will aim to protect. The council is in the process of producing a comprehensive landscape and urban design framework (see policy S4) which will give further details on the landscape features and character of the ALLIs:

(i) **HOGMARSH VALLAY**

**Location and character**

Undulating, open farm land and distinctive wooded hilltops extending north from Frindsbury and Medway City Estate to Chattenden.

**Function**

Forms a green buffer separating, and providing an attractive green backdrop for the built-up areas of Medway City Estate, Frindsbury, Wainscott, Lower and Upper Upnor and Chattenden.

Provides an attractive setting for a major gateway within the borough – the Medway Towns Northern Relief Road, contributing towards a positive image of Medway.

Connects all ALLIs at Chattenden Ridge, Deangate Ridge and Cockham Farm Ridge.

Provides an attractive setting for Manor Farm and Upnor conservation areas.

(ii) **CHATTENDEN RIDGE**

**Location and character**

Prominent wooded ridge extending NE from Chattenden and Cliffe Woods towards High Halstow.

**Function**

An important landscape feature forming the backbone of the Hoo Peninsula. Attractive setting to the rural settlements (Cliffe Woods and High Halstow) and countryside of the Hoo Peninsula.

Forms an attractive screen to the RSME training areas.

(iii) **DEANGATE RIDGE**

**Location and character**

High Ridge with a diverse landscape of woodland, agriculture, orchards and golf course, adjacent to the A228 near Hoo St Werburgh.

**Function**

Separates and screens RSME training areas from Hoo St Werburgh.

Fulfils a significant recreational and visual amenity role.

Creates an attractive setting for the A228.  
Important to the setting of any possible future development of the RSME site.

(iv) **COCKHAM FARM RIDGE**

**Location and character**

Prominent wooded ridge extending east from Lower Upnor to Hoo St Werburgh along the north shore of the River Medway, and rolling agricultural landscape sloping gently towards Hoo St Werburgh.

**Function**

Forms a green, elevated backdrop to Chattenden, Hoo St Werburgh, Hoo Marina and River Medway when viewed from Chatham Maritime.

Separates and strengthens the individual identities of Upnor, Chattenden, Hoo St Werburgh and Hoo Marina.

Forms the northern shoreline and an attractive green backdrop to the river and the urban area.

Only stretch of wooded shoreline to River Medway within borough.

(v) **DILLYWOOD LANE**

**Location and character**

A gently undulating, visually diverse area of orchards and mixed farmland. Extends from the NW edge of Strood and Wainscott to the borough boundary.

**Function**

Creates an attractive, rural setting to the Medway Towns Northern Relief Road, contributing to the positive image of the borough.

Connects to the South East of Higham Upshire ALLI in Gravesham.

Constitutes an established rural landscape in close proximity to a large urban area.

Helps to maintain separate identity of Higham.

(vi) **HALLING COMMON**

**Landscape and character**

Area of flat marshland abutting Halling village, highly visible from the slopes of the Medway valley.

**Function**

Important to the rural landscape setting of Halling (and Wouldham on the other side of the River Medway in Tonbridge and Malling borough).

Connects to the similar landscape of Wouldham Marshes ALLI in Tonbridge and Malling borough.

Defines edge of Halling preventing urban sprawl, and encroachment towards riverbank.

Contributes to attractive views from the railway and river.

(vii) **CUXTON BRICKFIELDS**

**Location and character**

Visually prominent area rising from marshes along River Medway up to the Kent Downs AONB. Includes former Cuxton Chalk Pits 1 and 2 now landscaped.

Adjacent land affected by M2/CTRL works will take time to recover, so protection of this landscape is important.

**Function**

Maintains the separation between Strood and Cuxton, helping to retain individual identity.

Contributes towards the setting of Cuxton Village.

Extremely prominent from A228, M2, CTRL, Medway valley railway and the river – when approaching or passing through the borough. Forms a gateway to the urban area to be preserved and enhanced. For

ms a green backdrop to Medway Valley Park from across the river in Borstal and Rochester.

Creates a visual link and balance with the Kent Downs AONB on the other side of the river.

(viii) **NASHENDEN VALLEY**

**Location and character**

Prominent, steeply sloping chalk scarp rising from M2 towards Borstal.

**Function**

An important local landscape feature visible from M2 and CTRL.

Provides attractive, rural setting to the M2.

Forms a visual connection with southern side of valley, within Kent Downs AONB.

Provides open setting to Fort Borstal Scheduled Ancient Monument.

Forms a green backdrop to the urban area.

(ix) **TADDINGTON WOOD and BEECHEN BANK**

**Location and character**

Attractive, well wooded valley areas extending into Walderslade and Lordswood.

**Function**

Provide valuable green breaks in the surrounding urban development.

Conceal and provide a setting for urban development at Walderslade and Lordswood.

Beechen Bank connects to an ALLI in Maidstone borough.

(x) **HORSTED VALLEY**

**Location and character**

Finger of open space extending from A229 close to Rochester Airport, to Luton, including Coney and Daisy Banks.

**Function**

Provides a valuable open space close to a large urban area.

Defines urban areas, maintaining identities of separate communities.

Proves a green backdrop to SE side of valley which is generally built-up (Wayfield Estate).

Provides open setting to Fort Horsted and Luton Scheduled Ancient Monuments.

(xi) **CAPSTONE, DARLAND and ELM COURT**

**Location and character**

A substantial tract of undeveloped land extending from the North Downs as a green wedge into the heart of the urban area.

**Function**

Particularly attractive and important landscape feature defining urban areas, and preventing coalescence of Lordswood/ Princes Park and Hempstead.

Contributes significantly to informal open space needs of the communities which adjoin it.

Provides a rural landscape in close proximity to the urban area, bringing the countryside into the town.

Provides a wider landscape setting for Capstone Farm Country Park.

Contributes to the setting of the Kent Downs AONB to the south and the M2 motorway.

(xii) **MEIRSCOURT/MERESBOROUGH**

**Location and character**

Area of traditional Kentish farm landscape with country lanes on the eastern periphery of the borough.

**Function**

It is important as a buffer zone, helping to counteract outward pressure of urban sprawl and maintaining the separation of settlements. It is a continuation of adjacent areas in Swale Borough which are subject to a

settlement separation policy in the Swale Borough Local Plan. ALLI designation is consistent with Kent Structure Plan policy NK2, restricting the outward expansion of the urban area onto fresh land east of Gillingham, and with para. 6.15 of RPG9a, which specifically mentions the countryside north and east of Gillingham as being particularly important in the context of urban fringe land providing valuable countryside and recreation opportunities.

(xiii) **GILLINGHAM RIVERSIDE**

**Location and character**

Rural landscape of orchards and arable fields with country lanes. Situated to the north of Rainham and Twydall, adjacent to the River Medway. Medway Towns Northern Relief Road forms the western boundary.

**Function**

Forms an important green buffer separating the built-up areas of Twydall and Rainham from areas of international importance for nature conservation and recreation along the Medway estuary.

Enhances the setting of the Medway Towns Northern Ring Road on the western boundary, and allows attractive views from the river and railway.

Provides residents within an extensive urban area with access to an attractive, rural landscape.

Provides an attractive setting to the Lower Rainham and Lower Twydall conservation areas.

Contains a number of orchards, mature hedgerows and farm groups complementing and contributing to the Riverside Country Park.

Forms a green backdrop when viewed from the Medway Estuary.

(xiv) **GREAT AND LOWER LINES**

**Location and character**

Prominent open areas of historical interest, associated with fortifications between Gillingham, Chatham and Brompton.

**Function**

Provide valuable open space in contrast to heavily built-up areas around them, with fine views over Strood, Rochester and Chatham.

Contributes to the setting of Brompton conservation area.

Defines the western edge of Gillingham, maintaining the separate identities of Gillingham and Brompton.

Great Lines forms an attractive green backdrop to Chatham town centre.

(xv) **CLIFFE POOLS AND PITS**

**Location and character**

Distinctive, complex landscape of man-made lagoons and chalk pits west of Cliffe. The area is gradually reverting to a more natural appearance with well vegetated margins, spits and islands.

**Function**

Connects the extensive North Kent Marshes Special Landscape Area with the North Kent Marshes ALLI in Gravesham.

Industrial activities remain but the role of the ALLI is to inhibit further destruction of the landscape, protect the natural recovery that has occurred, and encouraged further positive efforts to restore the landscape.

Complements the proposals for a Conservation Park within the area.

(xvi) **BROOMS WOOD**

**Location and character**

Belt of remnant ancient woodland lying immediately south of Parkwood and Rainham, next to the M2.

**Function**

Provides a buffer and attractive screen to the M2 from adjacent residential areas.

Forms an attractive setting to the motorway as it passes through the borough, and reduces its impact on the countryside.  
Forms an important visual link with blocks of woodland on the other side of the M2 (within the Kent Downs AONB).

### **POLICY BNE34: AREAS OF LOCAL LANDSCAPE**

#### **IMPORTANCE**

***Within the Areas of Local Landscape Importance defined on the Proposals Map, development will only be permitted if:***

- (i) it does not materially harm the landscape character and function of the area; or***
  
- (ii) the economic and social benefits are so important that they outweigh the local priority to conserve the area's landscape.***

***Development within an Area of Local Landscape importance should be sited, designed and landscaped to minimise harm to the area's landscape character and function.***

## **Nature Conservation**

- 3.4.108 Medway contains an outstanding wildlife resource that has an important role to play in maintaining biodiversity. Biodiversity is the range in variation of living species and their habitats, and this extends from the local level up to the global scale. It is Government policy that biodiversity be conserved for its own sake as detailed in the "UK Biodiversity Action Plan". Indeed, the *Kent Biodiversity Action Plan* has been drawn up to reflect these ideals and the *Kent Wildlife Habitat Survey* reveals that 10,960 hectares (53.4%) of Medway is semi-natural habitat.
  
- 3.4.109 Medway Council takes very seriously its responsibility to conserve wildlife resources. A wildlife and countryside strategy is being prepared which will be used as a basis for the management of the natural environment, supplementing the local plan, and including measures to actively manage sites to improve their wildlife interest. Furthermore, in certain instances, positive management of areas can be achieved through the use of planning obligations in association with development proposals.



# **Appendix 3: Medway Landscape Character Assessment, 2011 Extract – Lower Rainham Farmland Landscape Character Area**

# 21 Lower Rainham Farmland

Landscape type: Urban Fringe (T2)  
 Sub-types: Urban fringe with urban/industrial influences (T2b)  
 Forms part of North Kent Fruit Belt Character area (KCA 2004)

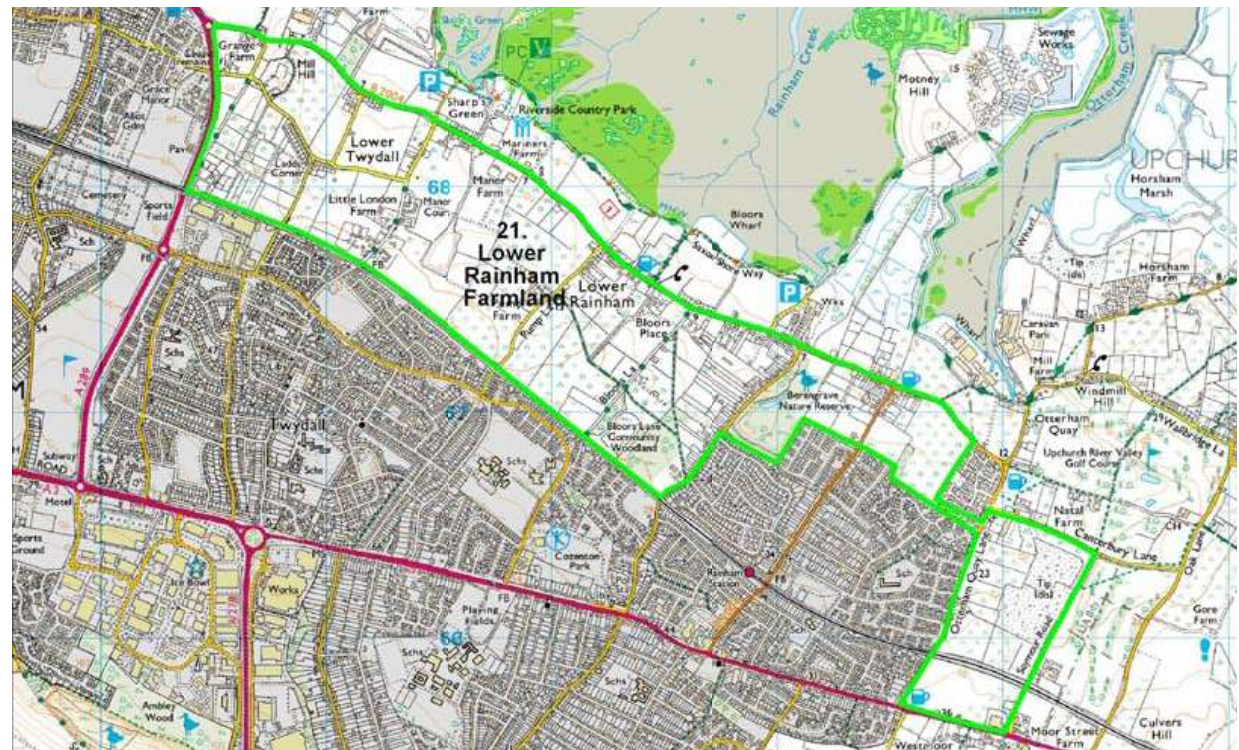
## Description

- Location – Lower Rainham Road (B2004) and Riverside Marshes/Country Park to north; railway line and Twydall to south; Gillingham to west; Lower Rainham and countryside to east
- Geology – Upper Chalk and Thanet Beds (solid) with head deposits
- Soils – Predominantly Grade I
- Accessibility – footpath network fragmented; no continuous, direct link between Grange Farm and Berengrave Nature Reserve; rail line causes severance and weakens links into urban areas to south
- Designations – ALLI; 2 no. Conservation areas; 2 no. Rural lanes; 1 no. community woodland; Local Nature reserve
- Flood – Berengrave area at risk from tidal flooding (2003)

## Characteristics

- Flat, small to medium scale mixed farmland – orchards, arable, rough grazing
- Neglected pockets of land and busy road gives transitional urban fringe character to area; gradual trend towards suburbanisation (e.g. boundary features) in some localised areas
- Some well managed areas of orchard, shelterbelt, farm buildings, cottages and distinctive rural hedgebanks
- Tranquil in many parts despite enclosure by road to north and rail to south

- Poor accessibility – east/west and north/south links to urban areas
- Recent urban extension to north west of Otterham Quay Lane now divides this character area and diminishes coherence; area to east beyond Rainham has particularly detracting urban and industrial features – including industrial estate, tip with vents and railway line; golf course to north along Swale boundary
- Includes small conservation areas/hamlets at Lower Rainham and Lower Twydall



## Analysis

### Condition *Moderate*

Pattern of elements – Variable  
 Detracting features – Some  
 Visual Unity – Interrupted  
 Ecological integrity – Moderate  
 Cultural integrity – Variable  
 Functional integrity – Moderate

### Sensitivity *Moderate*

Distinctiveness – Distinct  
 Continuity – Historic  
 Sense of place – Moderate  
 Landform – Apparent  
 Tree cover – Intermittent  
 Visibility – Moderate

### Actions *Conserve and Create*

#### Issues

- Value of area as green corridor linking community in urban areas to countryside and role as extended buffer to Country Park and Natura 2000/Ramsar protected coastline
- Consideration of the integral links between this character area and the Riverside Marshes character area
- Potential to restore traditional orchards; strengthen and enhance biodiversity opportunities; introduce more positive land management systems; respect for historic characteristics (see General Notes)
- Poor condition of some farmland areas, tendency towards fragmentation and trend towards urban fringe activities and weakened coherence
- Grade I agricultural soil classification
- Threat of expansion to urban edges on south and west sides, along with gradual, pervasive erosion of rural character



#### Guidelines

- Restore neglected and abandoned fields to appropriate and sensitive rural land uses – e.g. orchard, woodland, pasture and arable farming; seek to reverse decline in condition of landscape and reinforce rural characteristics
- Improve east/west footpath links between Gillingham and open countryside and footpath links from Twydall
- Introduce regular management of hedgerow boundaries (particularly along rural lanes)
- Discourage conifer planting and other forms of creeping suburbanisation – e.g. inappropriate fencing, gates, ornamental planting
- Resist further built development and introduce more positive landscape management systems
- Consider this area integrally with Riverside Marshes character area for its integral value as a green buffer, wildlife corridor and link to wider countryside

## General Notes

- There is considerable variation in the condition of this character area, with some pockets in serious decline and other well managed and cared for areas; area between Lower Rainham and Lower Twydall in generally good condition with urban influences less apparent; area to the east beyond the Rainham urban extension in particularly poor condition with urban fringe and amenity land uses detracting from rural character. Area has high levels of visibility along coastline; inland areas more secluded and screened from views
- There are a number of benefits attached to this area retaining its essentially rural character. It provides a valuable green buffer separating the built up areas of Twydall and Rainham from valuable and internationally protected wildlife sites along Medway estuary; it offers openness and easy access to a countryside area for an extensive urban population; it improves the setting of the A289 along its eastern boundary and provides attractive open views across the marshes and farmland from the railway line and main road; it also improves the setting of the Lower Rainham and Twydall Conservation areas; along with the Riverside Marshes area it provides a distinctive green backdrop when viewed from the Medway estuary
- Historic note. This area has potential for greater understanding of how the marshes and farmland operated as a system and what impact this had for landscape character and the location of settlements. Grange Farm is a major medieval moated site and also had significant Roman archaeology. Along this edge we can anticipate a series of Roman if not earlier estates that are located on creeks between the river and the road network. Important to see movement by water as part of the landscape organisation.