

Land south of Crockenhill Road, St Mary Cray

Green Belt Assessment
July 2025

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This document has been prepared and checked in accordance with ISO 9001:2015.

1.0 Introduction and Summary

1.1. Appointment and Scope

LDA Design was commissioned by Land Improvement Holdings to undertake a Green Belt Assessment in support of an outline planning application with all matters reserved except for access for the erection of up to 325 residential dwellings, including at land south of Crockenhill Road, St Mary Cray (Site), located within the Metropolitan Green Belt that surrounds Orpington. The Site and its location are illustrated on Figure 1. The Site is located within London Borough of Bromley (LBB).

The purpose of this report is to assess the performance of Green Belt purposes and potential harm to the Green Belt in the context of the policy tests in paragraphs 153-155 of the National Planning Policy Framework (NPPF) (December 2024), as further set out in sections 2 and 3 of this report. The report should be read alongside the Planning Statement submitted in support of the planning application, which addresses other aspects of the policy tests contained in those paragraphs.

1.2. Summary

The assessment in section 4.4.6 of this report concludes that the Site is grey belt and that the test in NPPF paragraph 155(a) is met as outlined in section 5.4. The Planning Statement concludes that the tests in paragraphs 155(b) to (d) are also met, and accordingly the proposals do not represent inappropriate development in the Green Belt.

Notwithstanding the above finding, in the event that the proposals are considered to comprise inappropriate development in the Green Belt, section 5.0 of this report assesses the potential harm that would be caused to the Green Belt in terms of loss of openness and conflict with Green Belt purposes, to inform the application of NPPF paragraph 153, which is addressed in the Planning Statement.

2.0 Policy Context

2.1. National Planning Policy Framework

2.1.1. Aim and purposes of the Green Belt

National Green Belt Policy is set out in section 13 of the National Planning Policy Framework (NPPF) (revised December 2024).

Paragraph 142 states:

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

Paragraph 143 sets out the purposes of Green Belt:

"Green Belt serves five purposes:

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

2.1.2. Development in the Green Belt

Paragraphs 153 onwards address development proposals affecting the Green Belt.

Paragraph 153 states:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm arising from the proposal, is clearly outweighed by other considerations."

This paragraph sets the policy test for 'inappropriate' development within the Green Belt. The application of the test in paragraph 153 is addressed by the Planning Statement submitted alongside the planning application.

Paragraph 154 states that development in the Green Belt is inappropriate unless one of a number of exceptions applies. In this instance, none of the exceptions apply to the proposed development.

2.1.3. Grey belt

Paragraph 155 contains a further exception to 'inappropriate' development, which applies to 'grey belt' land as follows:

“The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan; ...”*

Sub-paragraphs b), c) and d) are outside the scope of this report and are addressed in the Planning Statement.

Annex 2 of the NPPF sets out the following definition of grey belt:

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

The Planning Statement confirms that the exclusion in the second sentence of the above definition (relating to footnote 7) does not apply to the Site.

In relation to the first sentence of the above definition, Planning Practice Guidance (PPG) sets out guidance on assessing whether land ‘strongly contributes’ to Green Belt purposes (a), (b), or (d) (reference id: 64-005-20250225, see section 3.2.3 below). In the context of a planning application for land within the Green Belt, PPG paragraph 64-009-20250225 makes clear that this assessment should be performed for the development site itself, rather than for a wider land parcel.

2.2. Openness of the Green Belt

Green Belts were introduced to protect the countryside around urban areas from creeping urbanisation; as NPPF paragraph 142 says, *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open”*. Openness is therefore seen by policy as the means of preventing urban sprawl and, as paragraph 142 also states, it is one of the two essential characteristics of Green Belts (the other being permanence). However, openness is not defined in the NPPF.

PPG (reference id: 64-013-20250225) covers ‘What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?’. It states:

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

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

This excerpt from the PPG makes clear that assessing the impact of a proposal on the openness of the Green Belt requires a judgement based on the circumstances of the case. It identifies a number of matters (spatial and visual considerations, duration, irremediability and degree of activity) which may need to be taken into account but makes clear that this is not an exhaustive list.

Whilst the spatial aspect of openness is relevant only within the site where development is to take place, other aspects can be relevant to the wider Green Belt beyond the site boundary. For example, the inclusion of visual aspects when considering impact on openness indicates that openness should be considered not only in terms of the site itself but also in terms of the wider Green Belt. If development takes place on a Green Belt site that has a high level of visual containment, the development may not be visible from the wider Green Belt and consequently may not change the perception of openness within the wider Green Belt beyond the site boundary. On the other hand, a development that is highly visible from the wider Green Belt could affect the perception of openness within the wider Green Belt, thus increasing the harm to openness.

The degree of activity can similarly affect the perception of openness beyond the site boundary by signalling the presence of a development. Duration and irremediability are relevant to considerations of openness, both within the site of a potential development and within the wider Green Belt beyond the site boundary.

2.3. Green Belt Harm

Where the proposed development is ‘inappropriate’ (for example if the site does not meet the definition of ‘grey belt’ in section 2.1.3 above), it will need to meet the test for ‘*inappropriate development*’ in the Green Belt as set out in NPPF paragraph 153. The test requires potential harm to the Green Belt “*by reason of inappropriateness*” to be considered. Inappropriateness is not defined in the NPPF or elsewhere, but its meaning can be discerned from paragraph 154(h), which states that certain forms of development are not inappropriate “*provided they preserve its openness and do not conflict with the purposes of including land within it*”. In relation to the specified forms of development, therefore, the tests as to whether or not they are inappropriate, are whether or not they harm the openness of the Green Belt or conflict with Green Belt purposes. Paragraph 154(b) sets the same tests for buildings for outdoor sport and certain other uses.

It is therefore clear that the considerations to be taken into account in assessing harm to the Green Belt for the purposes of paragraph 153 are potential loss of openness (discussed in section 2.2 above) and conflict with Green Belt purposes.

Where required, harm to the Green Belt, both in terms of openness and Green Belt purposes, is assessed at Section 5.0.

2.4. Local Policy

The Site is within the authority of the London Borough of Bromley. Relevant adopted and emerging planning policy documents are as follows (refer to Figure 2 for planning context):

- London Plan (adopted March 2021)

- Adopted Bromley Local Plan (adopted January 2019)
- Regulation 18 Issues and Options Bromley Local Plan (published April 2023)

2.4.1. London Plan (2021)

Policy G2 Green Belt requires Green Belt to be protected “*from inappropriate development:*

- 1) *development proposals that would harm the Green Belt should be refused except where very special circumstances exist,*
- 2) *subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.”*

2.4.2. Bromley Local Plan (2019)

Policies 49 to 53 concern the Green Belt, with the most relevant to this assessment being:

Policy 49 The Green Belt states that “*Within the Green Belt permission will not be given for inappropriate development unless very special circumstances can be demonstrated that clearly outweigh the harm by reason of inappropriateness or any other harm. ”*

2.4.3. Regulation 18 Issues and Options Bromley Local Plan (2023)

Given the early stages of the emerging Local Plan, no policies are set out within this document, but Green Belt is a key theme within Section 7 Green Infrastructure, Open Space and Biodiversity. At paragraph 7.26, it states that ‘*The strong emphasis on protecting Green Belt ... as set out in national and regional policy will be a key consideration when preparing the Bromley Local Plan*’.

2.5. Local Green Belt Review

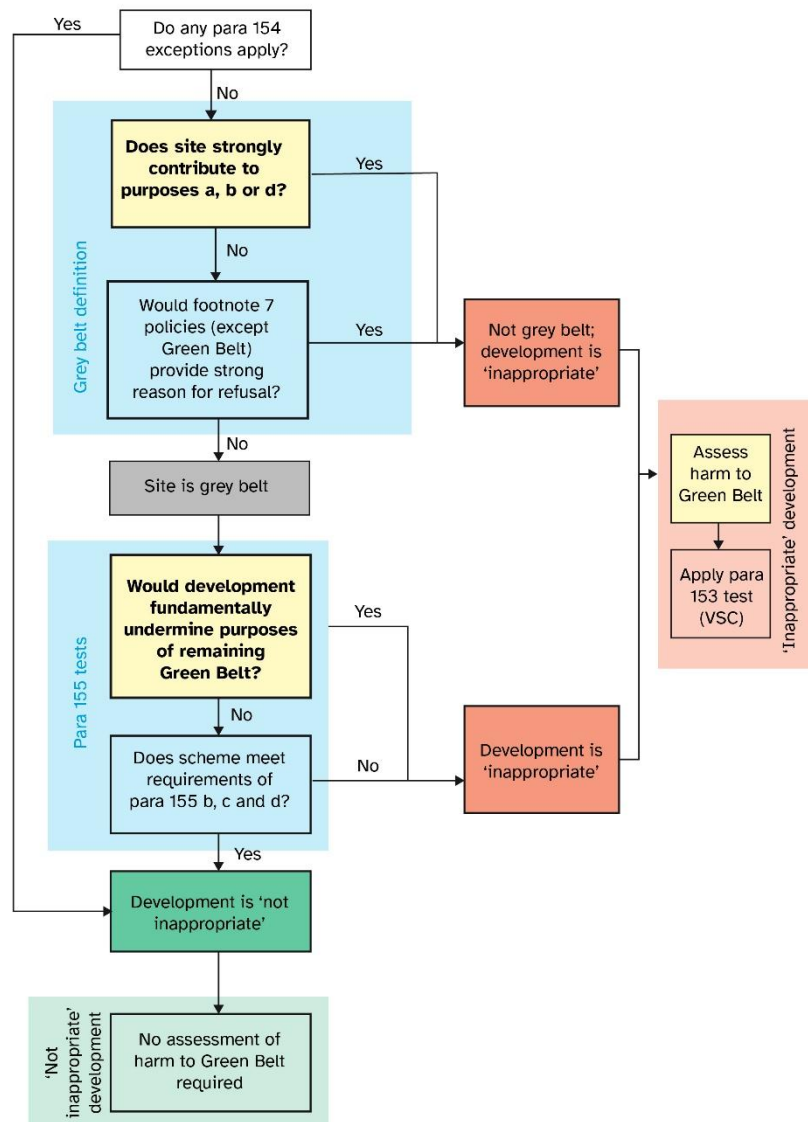
No Green Belt Review or Assessment has been undertaken by Bromley Borough Council.

Greater London Authority (GLA) will be undertaking a Green Belt review to inform future London Plan, but there is no current Green Belt Review or Assessment.

3.0 Methodology

3.1. Introduction

The following flowchart illustrates the decision-making process required by NPPF paragraphs 153-155, as set out in section 2 above. This report addresses the points highlighted in yellow. The remaining parts of paragraphs 153-155 are addressed in the Planning Statement.



Where the assessment concludes that the proposed development is ‘not inappropriate’, it is not necessary to assess harm to the Green Belt. However, in the event that the decision-maker concludes that the proposal is ‘inappropriate’ development, an assessment of Green Belt harm is necessary to inform the application of the paragraph 153 test. This report therefore includes an assessment of any potential harm to the Green Belt in section 5.

3.2. Baseline Assessment (see section 4.0)

3.2.1. The Site and its Context

The first step in the methodology is an appraisal of the Site and its context, considering issues such as use, condition, built form, visual considerations, character and the relationship between the Site and its surrounding context.

3.2.2. Green Belt Purposes

Next, the methodology assesses how the Site and wider Green Belt contributes in its current condition and use against the relevant Green Belt purposes defined in NPPF paragraph 143. The extent of the ‘wider Green Belt’ for Green Belt purposes is related to the specific purpose i.e. the area of Green Belt between towns relating to purpose b). Any existing Green Belt Reviews or Assessments by the relevant local authority are taken into account as part of this assessment. However, it should be noted that local authority assessments usually define land parcels for assessment, which are often of greater extent than a proposed development site. As noted in section 2.1.3 above, PPG paragraph 64-009-20250225 makes clear that it is the proposed development site itself, rather than a wider land parcel, that should be considered when identifying grey belt for the purposes of NPPF paragraph 155.

The PPG (reference id: 64-005-20250225) sets out guidance for how this assessment should be undertaken for purposes (a), (b) and (d), using contribution values of Strong, Moderate, Weak and None. This guidance is reproduced below.

Purpose A – to check the unrestricted sprawl of large built up areas

The PPG makes clear that this purpose relates to the sprawl of large built up areas, and that villages should not be considered large built up areas.

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: - be adjacent or near to a large built up area

Purpose A – to check the unrestricted sprawl of large built up areas

The PPG makes clear that this purpose relates to the sprawl of large built up areas, and that villages should not be considered large built up areas.

Contribution	Illustrative features
	- if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Purpose B – to prevent neighbouring towns merging into one another

The PPG makes clear that this purpose relates to the merging of towns, not villages.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns

Purpose B – to prevent neighbouring towns merging into one another

The PPG makes clear that this purpose relates to the merging of towns, not villages.

Contribution	Illustrative Features
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Purpose D – to preserve the setting and special character of historic towns

The PPG makes clear that this purpose relates to historic towns, not villages.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to):

Purpose D – to preserve the setting and special character of historic towns

The PPG makes clear that this purpose relates to historic towns, not villages.

Contribution	Illustrative Features
	- being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town

The PPG does not provide similar guidance for purpose (c). The LDA Design methodology therefore employs comparable assessment criteria, as below.

Purpose C – to assist in safeguarding the countryside from encroachment

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - not be immediately adjacent to a town - have a distinctly rural character - be free from urbanising influences from nearby towns or major infrastructure
Moderate	Assessment areas that contribute moderately are likely not to be immediately adjacent to a town, but include one or more features that weaken the land's contribution to this purpose, such as (but not limited to): - containing existing development - being subject to other urbanising influences

Purpose C – to assist in safeguarding the countryside from encroachment

Contribution	Illustrative features
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: - are adjacent to a town - contain a significant amount of existing development, or - are subject to other significant urbanising influences

Purpose (e) relates to the Green Belt within a Local Plan area as a whole and is not specific to any particular location within the Green Belt across the plan area. All Green Belt land within a local authority area therefore contributes equally to this purpose. The Planning Statement demonstrates that, notwithstanding purpose (e), local housing need cannot be met without developing land that is currently within the Green Belt. Consequently, the contribution made by the Site towards this purpose is not relevant to a decision on the planning application.

3.2.3. Grey Belt Definition

The definition of ‘grey belt’ is set out within Annex 2. The first part of the definition requires an assessment as to whether the Site strongly contributes to Green Belt purposes (a), (b), or (d). The assessment described in section 3.2.3 enables a conclusion to be reached on this point.

The Planning Statement addresses the second sentence of the ‘grey belt’ definition (relating to footnote 7).

3.2.4. Green Belt Openness

The next step in the methodology is to assess the existing openness of the Site itself and of the wider Green Belt in which the Site is located.

An assessment of openness is required for some of the exceptions to NPPF paragraph 154 and to inform the assessment of harm under paragraph 153 (if needed).

The assessment draws on relevant considerations arising from the appraisal of the Site and its context. In relation to matters identified in the PPG (see section 2.3 above), it considers the spatial and visual considerations that apply to the Site and the wider Green Belt in its existing state. The following outlines the definition of these considerations.

- **Spatial** – The amount of development within the Green Belt in terms of both volume and footprint. Whilst volume tends to be the main consideration for buildings, some forms of development, such as parking areas or hardstanding, can have significant footprint but minimal volume.

- **Visual** – The perceived openness, or otherwise, of the Green Belt as seen from within the Site and the wider Green Belt. The extent of the ‘wider Green Belt’ to be assessed is informed by the Zone of Visual Influence in the accompanying LVIA, which identifies where potential views towards the Site and proposed development may occur.

At this baseline stage, the assessment does not consider duration, irremediability and degree of activity, since these relate directly to the proposed development rather than the existing, undeveloped Site.

3.3. Assessment of Proposed Development (see section 5.0)

This part of the methodology assesses the extent (if any) to which the proposed development would change the baseline assessments of Green Belt purposes and openness.

3.3.1. Proposed Development

To inform the assessment, aspects of the proposed development that are relevant to Green Belt are identified and described. Proposals are described once all work is complete with any proposed planting mature to represent the resulting permanent development. This approach is taken given that para 142 of NPPF states that one of the essential characteristics of Green Belts are their ‘permanence’. In addition, proposals that could constitute ‘physical features that are readily recognisable and likely to be permanent’ in accordance with NPPF paragraph 149(f) and could be used to define a future realignment of the Green Belt boundary around the outer edge of the residential development are described.

3.3.2. Green Belt Openness

The openness of the Site with the application scheme in place is assessed, taking into account the spatial and visual considerations as used at the baseline stage (see section 3.2.2) and the additional matters identified in PPG, defined below:

- **Duration & Irremediability** – Whether the proposed development will be temporary or permanent, and whether the Site can subsequently be reinstated to an ‘open’ condition.
- **Degree of Activity** – The additional activity the proposals would bring about (for example in terms of vehicular or pedestrian movements, by noise, etc) and how this would affect the perception of openness within the Site and the wider Green Belt (extent as described at 3.2.2 for visual).

Any changes from the baseline assessment are identified and described.

3.3.3. Green Belt Purposes

Using the same criteria as at the baseline stage, the extent to which the Site and the wider Green Belt would perform Green Belt purposes is reassessed with the proposed development in place, enabling any change from the baseline assessment to be identified.

3.3.4. Paragraph 155(a) Test

If the Site is grey belt, the second part of NPPF paragraph 155(a) requires an assessment as to whether the proposed development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. This therefore requires consideration of the effects of the development on the wider Green Belt beyond the Site, extending to the entirety of the Green Belt within the Local Plan area.

This assessment draws from the assessment of the effects of the development on individual Green Belt purposes as described in section 3.3.3 and reaches an overall conclusion in relation to the purposes, taken together.

The Planning Statement addresses parts b), c) and d) of paragraph 155 and reaches an overall conclusion as to whether the proposed development is 'not inappropriate'.

3.3.5. Green Belt Harm

To inform the application of the tests in NPPF paragraph 153, the degree of potential harm to the Green Belt is set out in terms of both loss of openness and conflict with purposes. The following scale is used for the degree of harm:

Major	Total or major alteration to key elements, features or characteristics relevant to Green Belt openness or purposes, such that post development the baseline will be fundamentally changed.
Moderate	Partial alteration to key elements, features or characteristics relevant to Green Belt openness or purposes, such that post development the baseline will be noticeably changed.
Minor	Minor alteration to key elements, features or characteristics relevant to Green Belt openness or purposes, such that post development the baseline will be largely unchanged despite discernible differences.
Negligible	Very minor alteration to key elements, features or characteristics relevant to Green Belt openness or purposes, such that post development the baseline will be fundamentally unchanged with barely perceptible differences.

4.0 Baseline Green Belt Assessment

4.1. Site Context

As identified on Figure 1, the Site is located to the east of St Mary Cray, a neighbourhood to the north of Orpington, approximately 1km to the north-east of Orpington's High Street. The village of Crockenhill is located over 2km east of the site. Swanley is the nearest town, beyond Orpington, located approximately 2.5km north-east of the Site beyond the A20.

4.1.1. Topography

The topography of the Site and its surrounding area is shown on Figure 3. St Mary Cray is located along the valley of the River Cray which flows from the south to the north at approximately 40-50m AOD. To the east and west of the river, land rises up the valley sides to approximately 80m AOD at about 1km from the watercourse. Beyond, land falls to the east associated with a localised valley that feeds into the River Cray to the north, before rising again up to approx. 120 m AOD, associated with the Kent Downs.

The Site is located on the lower-lying west facing valley slope of the River Cray. Please refer to paragraph 4.2.1 for more information about the site terrain.

4.1.2. Vegetation

Within the landscape surrounding the Site, as shown on Figure 4, woodland and tree cover is relatively extensive to the east of St Mary Cray. This is notably associated with woodland blocks located along the ridge to the River Cray valley; and alongside local lanes and major transport infrastructure, in particular the railway linking St Mary Cray with Swanley, all of which give the rural landscape around St Mary Cray a wooded skyline. Large scale arable fields, with occasional hedgerow and hedgerow trees are often in contrast to the woodland blocks on higher ground.

Vegetation within the Site is limited to the field boundaries generally to the west of the site. There is no hedgerow along the eastern boundary of the site, which allows open views to rising land to the east. The nearest significant woodland is Kynaston Wood, which is an ancient woodland located on the ridge of valley slope, along Waldens Road circa 250m to the west of the Site. Further description of Site vegetation is provided at section 4.2.

4.1.3. Heritage

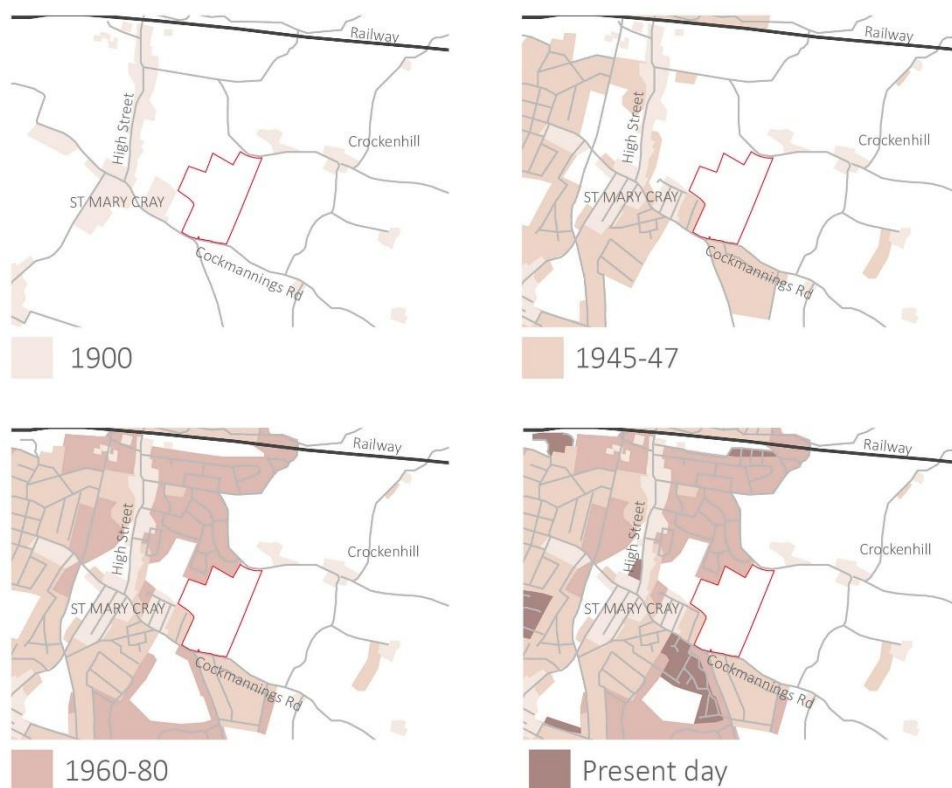
As shown on Figure 2, the historic core of St Mary's Cray is located along the valley floor of the River Cray, defined by numerous listed buildings and St Mary Cray Conservation Area. There is no relationship between the Site and the historic core of St Mary Cray.

To the north of the Site boundary is Grade II* Kevington Hall. In winter, when leaves are off trees, there are filtered views from within the Site to the listed building through boundary vegetation associated with Crockenhill Road, which are obscured when leaves are on trees.

4.1.4. Settlement Pattern

St Mary Cray was a linear settlement that had developed along the valley floor of the River Cray, making use of fast running water to power industry in Victorian times. Following WWII, the growth of London had extended east to reach St Mary Cray and merge with Orpington to the south, even extending beyond the Site to the south-east. By the late 20th Century, development had consolidated previous gaps and extended further north-east, resulting with built extent generally in alignment with the Site to the north and south.

Figure A: Historical growth of St Mary Cray



Beyond the Greater London urban area, there are a number of hamlets and villages, including Kevingtoun which is the closest to the Site, approximately 400m to the east, and Crockenhill being the closest village at just over 2km away to the east, both located along the B258 (Crockenhill Road).

4.1.5. Visual Context (refer to Figure 5)

From the wider countryside, views facing east towards the Site and St Mary Cray are largely defined by extensive features of built form interspersed with tree cover, with large scale arable fields providing the foreground including woodland blocks upon ridgelines, as demonstrated by LVIA viewpoint 4.

The localised ridgeline that wraps around the north, east and south of the Site prevents views from landscape beyond, which is further obstructed by woodland and tree cover

upon this higher ground (as demonstrated in LVIA Illustrative Viewpoint A – Kent Downs). Consequently, views towards the Site are extremely limited (maximum 500m distance) from the surrounding countryside to the east of St Mary Cray, as described by the Landscape and Visual Impact Assessment (LVIA) accompanying the planning application.

To the west, visibility of the Site is limited to residential streets that are either adjacent to the Site (LVIA viewpoints 1, 2, 5 and 6), or from streets that are oriented towards the Site from more elevated locations on the opposite side of the rising valley slope (LVIA viewpoint 7 along Friar Road). From this more distant viewpoint, views towards a sliver of the eastern-most edge of the Site are glimpsed between built form, rooftops, vegetation and other features associated with St Mary Cray. Land beyond the Site is visible rising beyond, with Kynaston Wood providing a significant woodland feature on the skyline.

4.1.6. Immediate Context

The immediate context surrounding the Site is as follows, illustrated on Figure 4 (Aerial Photograph):

- To the south running along Cockmannings Road is the northern urban extent of Orpington, primarily consisting of semi-detached bungalows to the east, with two-storey semi-detached dwellings towards the west. 12 storey apartment blocks are found further south off Chelsfield Lane and are visible from within the Site. A hedgerow and occasional hedgerow trees run along the north of Cockmannings Road immediately adjacent to the site.
- To the west is the urban extent of St Mary Cray, with two storey semi-detached and terraced residential properties along Rutland Way to the south-west, and Hodson Crescent to the north-west. Immediately west is St Mary Cray Recreation Ground, which has a more informal area adjacent to the Site, with formal sports pitches in its northern area, including a sports pavilion. Sholden Gardens further west includes up to 4 storey apartment buildings. Trees and shrub vegetation are located primarily along the south-western boundary of the Site, which separate it from the Recreation Ground and the Rutland Way cul-de-sac.
- To the north, the Site is bounded by two storey semi-detached residential properties associated with Burrfield Drive to the north-west, and Crockenhill Road (B258). Ruderal vegetation is generally found along the edges of the Site in this location, with exception to a hedgerow that runs along Crockenhill Road. Kevington Hall is set back north of Crockenhill Road, opposite the Site.
- To the east lies open arable farmland which rises up to Kynaston Wood and the well-vegetated Waldens Road, which broadly follow the localised ridgeline providing a treed skyline to the Site. Ruderal vegetation and a post and wire fence marks the Site boundary.

4.2. Site Description

The Site (approximately seventeen hectares) consists of a three, orthogonal fields. The largest covers approximately 70% of the site to the south, with the remaining two smaller fields located to the north. The site is bound by Crockenhill Road (B258) and Burrfield

Drive development to the north, residential development of Hodson Crescent and Rutland Way to the west along with St Mary Cray Recreation Ground, residential development associated with Cockmannings Road to the south and open arable fields to the east.

4.2.1. Site Terrain

The terrain of the Site is relatively low-lying, with gentle undulations associated with underlying valley topographies formed not only by the general slope towards the River Cray to the west, but also a gentle valley that runs across the centre of the Site in an east-west direction. These localised variations give parts of the Site a sense of topographical containment. The site rises from 52m AOD adjacent to Hodson Crescent in west of Site, to 63m AOD in the south-east corner of Site adjacent to Crockenhill Road. Land beyond the Site continues rising east to a localised ridge c. 80m AOD approximately 500m from the Site, wrapping to the north, east and south of the Site.

4.2.2. Site Fabric

As illustrated by LVIA Viewpoint 3, the Site is currently undeveloped land consisting of arable fields adjacent to the settlement edges of Orpington and St Mary Cray. The two smaller fields in the north of the Site are bounded by embankments covered with ruderal vegetation, with exception to the hedge that follows Crockenhill Road. The large field in the south of the Site has the greatest field boundary vegetation with a hedgerow that follows Cockmannings Road, as well as hedgerow and roadside trees, along with trees and vegetation adjacent to Rutland Way. The eastern edge of the Site is open with ruderal vegetation and a post and wire fence delineating the Site boundary.

Three public rights of way cross the Site as follows:

- Footpath FP180 – east-west route connecting St Mary Cray Recreation Ground through the centre of the Site with Kynaston Wood/Waldens Road
- Footpath FP179 – a ‘U’ shaped route that provides a north-south connection between Crockenhill Road and Cockmannings Road along the eastern boundary of the Site, before heading west along Cockmannings Road / Chelsfield Lane and back north-west towards the Site’s boundary with the St Mary Cray Recreation Ground.

4.2.3. Visual Environment of Existing Site

In summary from the above analysis, views towards the Site are extremely localised due to underlying topography, surrounding vegetation and built form. This means that views are generally limited to being: along the Site boundary itself; along public rights of way that cross the site; within 500m of Site boundary to the east; or in isolated pockets of visibility from elevated residential areas within St Mary Cray to the west, as outlined within the accompanying LVIA.

Views from the east towards the Site are across large scale arable fields in the foreground, with built form clearly visible around the Site associated with the current edge of Orpington and St Mary Cray. This mirrors views from within the Site found along its boundaries or the public footpaths that cross it, where views of the open arable fields within the site are edged by residential development that back or front onto the Site.

Views from within St Mary Cray upon elevated locations are across and through intervening built forms and features associated with the neighbourhood, with only slivers of the eastern edge of the Site glimpsed. Land to the east beyond the Site, rising to Kynaston Wood and Waldens Road, is more clearly visible.

Overall, the lower lying elevation of the Site within the Cray Valley, as well as existing residential areas to three sides of the Site, contribute to the Site's urban fringe character.

4.3. Existing Openness of the Green Belt

4.3.1. Spatial

Local Green Belt Context

The area of Bromley Borough's Green Belt within which the Site is located primarily protects land to the east of Orpington (and St Mary Cray) up to the borough boundary approximately 2km to the east. Broadly, this area of the Green Belt extends from the A20 to the north and the A21 to the south. Within this wider area of the Green Belt, there is the village of Chelsfield, a handful of small hamlets, such as Kevingtown, Hockendon and Maypole and numerous farmsteads and occasional properties along the rural lanes that criss-cross the area.

In terms of transport infrastructure, this area of the Green Belt includes: the railway line connecting Swanley and St Mary Cray which is either in cutting or embankment as it crosses the land; B258 (Crockenhill Road) connecting St Mary Cray with Crockenhill (latter within Sevenoaks District); and a number of meandering rural lanes.

Site

As outlined in section 4.2, the Site is an open area of land, characterised by three arable fields bounded by ruderal vegetation, hedgerow and occasional trees. There is no built development or areas of hardstanding.

4.3.2. Visual

Local Green Belt Context

The land within the wider Green Belt (extent as described at 4.3.1) is strongly undulating with established hedgerow and field boundaries along lanes, which including blocks of woodland upon elevated ground, creates an intimate and generally visually enclosed landscape that can be described as deeply rural. However, this contrasts with the large scale arable fields in the area which allow for occasional long distance views, where gaps in vegetation permit, from elevated locations. These long-distance views facing west are typically towards the expansive townscape of Orpington, and greater London beyond, thereby reducing the sense of rurality in these locations.

Site

As described at section 4.2 above, the Site sits upon the lower-lying slopes of the Cray valley. The ridge of the valley rises to the east, wrapping the Site to the north, east and south at a distance of c. 500m. Views from the wider landscape beyond this ridgeline towards the Site are therefore obstructed due to this topography, as well as vegetation

along the ridge. Views west of the ridgeline are limited due to the vegetation along Wardens Road, as well as Kynaston Wood. However, where views are available the Site is perceived as part of arable farmland nestled into the built edge of Orpington and St Mary Cray, which is possible due to the relatively open eastern edge of the Site. Notwithstanding this, the close proximity and the wide extent of the existing edge of Orpington and St Mary Cray around the edges of the majority of the Site have a significant urbanising influence, as well as views to the wider townscape beyond to the south and west (i.e. tower blocks in Orpington, dwellings associated with St Mary Cray rising on the opposite valley slope etc.).

4.4. Existing Contribution to Green Belt Purposes

4.4.1. Purpose A: To check unrestricted sprawl of large built-up areas

Existing development associated with St Mary Cray and Orpington are considered for this purpose to be 'large built up areas', which are found adjacent to the Site. The Site is enclosed by existing development to the north-west, west and south of the Site, which comprises c. 60% of the Site's perimeter. Existing development associated with Orpington continues further east by c. 370m beyond the Site's eastern boundary along Cockmannings Road immediately south of the Site. Visibility of existing development associated with St Mary Cray and Orpington exerts an urban influence across all of the Site. The eastern boundary of the Site has a public right of way (FP179) that marks its physical boundary.

Figure B: Extent of existing large built area adjacent to site



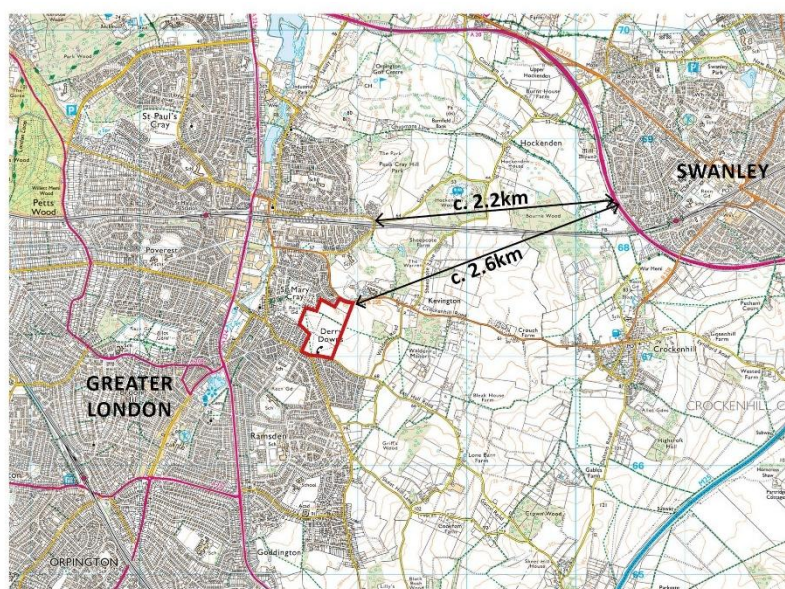
It is therefore judged that the Site makes, at most, a **Moderate** contribution to check unrestricted sprawl and, accordingly, does not strongly contribute to purpose (a).

4.4.2. Purpose B: To prevent neighbouring towns merging into one another.

The Site is located between London (Orpington District) and Swanley to the east, a town identified in Sevenoaks District Council's Settlement Hierarchy document dated July 2022. PPG notes that purpose (b) "*relates to the merging of towns, not villages*", therefore the hamlet of Kevingtoun and the village of Crockenhill are not relevant to purpose (b).

- **Swanley:** At the site, the gap between London and Swanley is c. 2.6km, with a ridgeline associated with the crest of the River Cray valley in the middle which visually and physically separates the settlements. Existing development associated with London, north of the site, is closer to Swanley at c. 2.2km distance.

Figure C: Distance between neighbouring towns in relation to site



PPG guidance states "*areas that contribute weakly are likely to include those that... form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation*". It is therefore judged that the Site makes, at most, a **Weak** contribution to preventing towns merging and, accordingly, does not strongly contribute to purpose (b).

4.4.3. Purpose C: To assist in safeguarding the countryside from encroachment.

The Site is surrounded on three sides by the existing edge of Orpington and St Mary Cray to the immediate north, south and west. Built form associated with these edges exerts an urban influence across the site whether through the buildings themselves or boundary structures (refer to Figure B).

It is judged that the Site makes, at most, a **Moderate** contribution to safeguard the countryside from encroachment and, accordingly, does not strongly contribute to purpose (c).

4.4.4. Purpose D: To preserve the setting and special character of historic towns.

It is not considered that Orpington District is an historic town. As outlined with the Planning Advisory Service guidance 'Planning on the Doorstep: The Big Issues – Green Belt' (2015), historic towns *"is generally accepted as relating to very few settlements in practice. In most towns there already are more recent developments between the historic core, and the countryside between the edge of the town"*. Development adjacent to the site associated with Orpington District was built in mid to late 20th Century, therefore the setting and special character of the historic core (which is primarily Victorian era) has already been impacted.

Notwithstanding the above, as illustrated on Figure 2, the site is separated from St Mary Cray Conservation Area by intervening built form and vegetation by c. 250m and there is no intervisibility.

Accordingly, the Site's contribution to preserving the setting and special character of historic towns is **None** and therefore does not strongly contribute to purpose (d).

4.4.5. Summary of Existing Contribution to Green Belt Purposes

Green Belt Purpose	Existing Contribution Judgement
Purpose A: To check unrestricted sprawl of large built-up areas	Moderate
Purpose B: To prevent neighbouring towns merging into one another	Weak
Purpose C: To assist in safeguarding the countryside from encroachment	Moderate
Purpose D: To preserve the setting and special character of historic towns	None

4.4.6. Grey Belt

The above assessment demonstrates that the Site does not strongly contribute to any of purposes (a), (b) or (d), with purpose (c) not of relevance to the consideration of whether land would meet the definition of grey belt (albeit the Site is concluded to only make an at most moderate contribution to this purpose). Taken together with the conclusions in the Planning Statement in relation to footnote 7, the Site therefore falls within the definition of grey belt set out in Annex 2 to the NPPF.

5.0 Effects on Green Belt

5.1. Proposed Development

The proposed development will include the construction of up to 325 dwellings and associated road infrastructure and open space.

The development proposals includes 7.95 hectares of green infrastructure encompassing a sequence of green spaces within the development accommodating amenity space, play space and drainage features. The eastern edge of the Site will feature a new 15m wide tree belt in order to deliver a future defensible Green Belt boundary feature.

The proposed development area, encompassing up to 325 dwellings measures 8.2 hectares and covers 48% of the site, as demonstrated on the parameter plan that accompanies the planning application. This development will include buildings such as dwellings, private gardens, garages, sheds as well as hard standing for roads, paths, parking areas, driveways and other built infrastructure such as walls, fences, lighting, street furniture, signage, utility boxes etc. Dwellings would comprise predominantly 2 storey houses along with a smaller proportion of 2.5 and 3 storey houses/apartments within the core of the Site to enliven the street scene and along the central green corridor, as outlined in the accompanying Design and Access Statement.

5.2. Green Belt Openness

5.2.1. Spatial

As the Site has no built elements within it, built development would occur across approximately 48% of the Site area, comprising building footprints and hard standing/structures (i.e. walls, fences, street furniture, lighting columns etc). Extending across the majority of the Site, this would be a fundamental change within the Site itself.

5.2.2. Visual

Visual considerations are particularly relevant to the perception of openness within the wider assessment parcel. Visibility of the proposed development from the adjoining Green Belt landscape will be limited by the localised ridgeline that wraps around the edge of St Mary Cray, c. 500m from the Site, as well as the proposed 15m wide tree belt along the eastern edge of the Site, screening and softening views of the majority of proposed built form from the wider Green Belt. Consequently, the proposed development will only be visible within close proximity to the Site and/or alongside the existing edge of Orpington and St Mary Cray. In this context, the proposed development would result in a minor alteration to the perception of openness.

5.2.3. Duration and Irremediability

The proposed development can be regarded as permanent and not remediable.

5.2.4. Degree of Activity

In relation to the degree of activity, the proposal may at times be more noticeable than existing movement and noise created by Orpington/St Mary Cray immediately adjacent to the site during the construction phase. This would be due to activities such as the movement of plant and materials, features such as stored materials, the occasional use of cranes and construction noise. However, the construction period will be relatively short-lived. Given that NPPF paragraph 142 states that one of the essential characteristics of Green Belts is permanence, greater emphasis should be given to the longer-term effects once the development has been completed than to short term effects during construction.

During the operational phase, there would be increased movements of vehicles and pedestrians within the Site and at the Site entrance on Crockenhill Road and Cockmannings Road; with increased pedestrian movements from the Site towards St Mary Cray Recreation Ground to the west, as well as along the aforementioned roads. However, these routes already have high levels of activity associated with public footpaths and local roads, therefore the perceived increase to activity would be minor. From within the adjoining Green Belt land, there is likely to be a minor increase in the perception of activity along public rights of way to the east of the Site, as well as St Mary Cray Recreation Ground to the west. There would be some increase in vehicular traffic along Crockenhill Road and Cockmannings Road moving east and west, but given the existing adjacent development associated with Orpington and St Mary Cray, it is expected that this would be a minor difference.

5.2.5. Degree of harm

Taking into account the various effects on openness outlined from section 5.2.1 altogether and using the scale of harm set out at section 3.3.5, it is considered that there would be a **Major** loss of openness within the Site itself, such that post development the baseline will be fundamentally changed.

This harm diminishes beyond the Site boundaries due to the proposed 15m tree belt along the eastern boundary, and existing built form associated with Orpington and St Mary Cray. Whilst the proposals would be visible from roads adjacent to the Site boundary (i.e. Cockmannings Road and Crockenhill Road), the areas that lie within Green Belt are already primarily dominated by built development / the edge of Orpington/St Mary Cray. Beyond the Site boundary as land rises to the east, the rooftops of the proposed development would be perceptible as a sliver above the mature proposed tree belt along the eastern Site boundary. This would increase the amount of perceived built form, and therefore it is judged that there would be a **Moderate-Minor** degree of harm to openness from the Site boundary up to 500m east of the Site, and **Negligible** beyond, due to the screening effects of topography.

5.3. Green Belt Purposes

5.3.1. Purpose A) to check the unrestricted sprawl of large built-up areas

As stated at section 4.5.1 above, the Site makes a Moderate contribution to purpose a), adjoining Orpington and St Mary Cray and acting as an additional barrier to sprawl. Given

the existing urban edge of Orpington and St Mary Cray to the north, west and south of the Site providing containment, the only remaining ability for sprawl to occur is to the east. Should the Site be developed, this would not result in an incongruous pattern of development, rather it would round off the existing large built-up area. The proposed 15m wide tree belt along the eastern edge of the site alongside the public footpath delineating the site boundary will provide a new, defensible feature that will provide definition and containment. Perceptually, development would be primarily visually contained with rooftops appearing as a sliver above the tree line as ground levels rise to the east.

Figure D: Urban extent of illustrative masterplan in relation to existing large built up area.



Consequently, it is assessed that the level of harm in relation to purpose a) is **Moderate**, i.e. that post development the baseline will be partially altered with noticeable changes.

5.3.2. Purpose B) to prevent neighbouring towns merging into one another

As noted at Section 4.5.2, the Site plays a weak role in the separation between London and Swanley. The easternmost edge of London is located approximately 2.2km from the nearest edge of Swanley. The Site, at its nearest point, is located approximately 2.6km from Swanley (as illustrated in Figure). Development of the Site would extend the built edge of London approximately 100m closer to Swanley, but would not reduce the gap between the two settlements at their closest point.

As set out in the visual analysis, the localised ridgeline east of the Site visually separates London from Swanley, which is further enhanced by woodland vegetation on high ground resulting in no intervisibility between the two settlements. Consequently, it is assessed that the level of harm in relation to purpose b) is **Negligible**, i.e. that post development the baseline will be largely unchanged.

5.3.3. Purpose C) to assist in safeguarding the countryside from encroachment

Since the Site lies outside the settlement boundary, the proposed development would by definition cause a degree of encroachment on the countryside. However, in perceptual terms, as described in section 4.5.3, the Site is subject to urbanising influences.

Consequently, it is judged that the Site has a Moderate contribution to purpose c).

Given that the increase in encroachment will be limited to the Site itself, and that there would be a low perception of encroachment on the wider Green Belt, it is assessed that the level of harm in relation to purpose c) is **Moderate**, i.e. that post development the baseline will be partially altered with noticeable changes.

5.3.4. Purpose D) to preserve the setting and special character of historic towns

As set out at Section 4.4.4, Orpington is not considered to be an historic town and there is no intervisibility between the Site and the historic setting of St Mary Cray due to intervening vegetation and existing built development. It is therefore considered that there is **Negligible** harm to this purpose.

5.3.5. Summary of harm to Green Belt Purposes

Green Belt Purpose	Harm Assessment
Purpose A: To check unrestricted sprawl of large built-up areas	Moderate
Purpose B: To prevent neighbouring towns merging into one another	Negligible
Purpose C: To assist in safeguarding the countryside from encroachment	Moderate
Purpose D: To preserve the setting and special character of historic towns	Negligible

5.4. Paragraph 155(a) Test

As outlined in sections 4.3.1 and 4.3.2 above, the wider Green Belt (i.e. plan area of Bromley Borough) generally protects land to the east of Orpington (and St Mary Cray) up to the borough boundary approximately 2km to the east. Broadly, this area of the Green Belt extends from the A20 to the north and the A21 to the south.

The above table at 5.3.5 assesses that the proposed development would not fundamentally diminish the separate performance of any of the Green Belt purposes in the wider Green Belt, i.e. no Major harm. Taking together all four purposes, assuming that each purpose is

weighed equally, it can be judged that the average harm would be **Minor** across the wider Green Belt area.

Consequently, the proposed development would not “*fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*”. The proposed development therefore meets the requirements of NPPF paragraph 155(a). The Planning Statement assesses the remaining parts of paragraph 155 to reach a conclusion as to whether the development would be ‘not inappropriate’.

5.5. Summary of Green Belt Harm

In summary, the assessment has identified that the proposed development will give rise to the following harm to the Green Belt:

- Openness: **Major** harm within the Site itself, diminishing to **Moderate-Minor** harm beyond the Site boundary to approximately 500m east of the Site up to the localised ridgeline seen in the context the existing settlement edge of Orpington and St Mary Cray; **Negligible** harm to Green Belt openness beyond.
- Purposes: **Moderate** harm arising from conflict with purpose a); **Negligible** harm arising from conflict with purpose b); **Moderate** harm arising from conflict with purpose c); **Negligible** harm with purpose d).