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3 June 2026

Dear Mr McCormack and Mr Hendley

MEDWAY COUNCIL'S RESPONSE TO THE INSPECTORS' NEXT STEPS (MLP/ED9)

Thank you for your helpful letter dated 28 May 2026 (ref: MLP/ED9). The Council welcomes your proposed approach in providing greater certainty on the progress of the Examination and advising the Council on our next steps. I have responded positively to your follow up queries below.

Green Belt

Please find attached the external critique of an early draft Green Belt Review in Appendix A1. This reflects the comments of technical consultants on an early draft of the Council's in-house Green Belt Review. Due to limited capacity in consultancy services and the timing for the preparation of the Draft Plan, the consultants did not produce a separate report. The format of this document is presented as suggested tracked changes and comments. Due to their length, the content of some comments is obscured in Appendix A1; please find attached all content of all comments in Appendix A2. The external critique was considered in the compilation of the submitted Green Belt Review (ref: B8).

The Council is coordinating an update to the Statement of Common Ground with Prescribed Bodies (ref: A12.1). There is ongoing collaboration with Gravesham Borough Council on the 'West of Strood' cross-border site allocation, which includes taking the developer-led masterplan to a Design Review Panel on 24 June. An update on the position with Gravesham Borough Council can be provided by the end of June, if helpful. I anticipate sending the updated Statement of Common Ground to you by 31 July, given the need for the Environment Agency to review the Flood Defence Strategy (see below under 'Supporting Evidence Documents').

Gypsy and Traveller and Travelling Showpeople

The Council is preparing a report to our Cabinet meeting on 4 August 2026, setting out our proposed approach to addressing the needs for Gypsy, Traveller and Travelling

Showpeople. This will be a joint report from the Planning and Housing services. The actions set out in the table below will be considered in the report.

The Council will carry out the following actions in the coming months to meet the needs of Gypsy, Travellers and Travelling Showpeople:

Action	Month
A 'Call for Sites' exercise to identify the availability of any wider land for assessment for its suitability for use	8 June - 20 July
Review sites in the Council's ownership with the objective of identifying deliverable and developable sites for the first 10 years of the Plan, with a report to be presented to the Council's Cabinet in Summer 2026	June - July Cabinet 4 August
Options to securing land suitable for Gypsy and Traveller accommodation that is being used for wider residential needs, including through Compulsory Purchase, related to the supply later in the plan period	June - July
Assessing the potential for including land in strategic development allocations for Gypsy, Traveller and Travelling Showpeople as part of the wider land uses	June - July
Engagement with the Traveller Showpeople's community to re-assess the existing site to confirm whether it has capacity to accommodate additional plots	June - July
Potential consultation on allocations	17 August - 28 September

The Council anticipates that the work to be carried out in June and July, with the consideration of Cabinet in early August, could result in proposed potential allocations for sites. The Council plans consultation, and would prepare a proposed main modification on site allocations for further consideration in the Examination, with information available in advance of the Phase 2 hearing sessions.

The Council will respond to you more fully by 31 July on Gypsy, Traveller, and Travelling Showpeople matters, reporting on the outcomes of the work carried out in June and July. However, it is noted that the Cabinet report will be considered on 4 August. This report will be in the public domain by 31 July, but decisions not yet made by this date. I can clarify the position in our response at that time.

Supporting Evidence Documents

The Council supports your advice for a four-week consultation on supporting evidence documents, which were not available at the Publication stage of the plan in June 2025. We confirm that this consultation will start on 8 June and run to 6 July 2026. Please find attached a list of 35 documents that will be subject to this consultation at Appendix B. The majority of the documents were published in December 2025 with the submission of the plan. There are four new documents that have been produced more recently:

- Review of updated SFRA data and implications for the Regulation 19 Sustainability Appraisal (proportionate review of the Sustainability Appraisal)
- Playing Pitch Strategy
- Built Facilities Strategy
- Facilities Planning Model

My team will provide a report on the representations, including a summary and the Council's responses to the representations, by 24 July.

As in section 2.13 of the Statement of Common Ground with Prescribed Bodies (ref: A12.1), the Council has commissioned a Flood Defence Strategy to aid ongoing, long-term collaboration with the Environment Agency. This work will be available by 30 June for the Environment Agency's review before updating the Statement of Common Ground with Prescribed Bodies (ref: A12.1).

The Council has commissioned additional work to produce an outline design, costings and traffic modelling of an interim scheme (i.e. within the highway boundary) for junctions on the A228 that require mitigation early in the plan period. This work will be available by 3 July. This will inform the drafting of statements of common ground with planning agents.

Following the publication of Gravesham Borough Council's pre-submission draft plan and ongoing engagement with National Highways, the Council is considering commissioning additional work to assess the cumulative impacts on the capacity and safety of the Strategic Road Network at M2 junctions 1 and 3. This will be discussed in a meeting to be arranged with National Highways and Gravesham Borough Council before updating the Statement of Common Ground with Prescribed Bodies (ref: A12.1) and the Statement of Common Ground with National Highways (ref: A12.2).

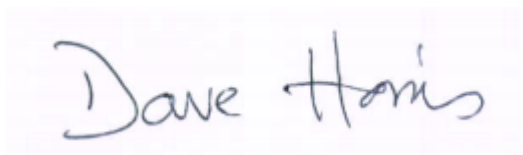
The Council is preparing an update to Green and Blue Infrastructure Framework to reflect the latest contextual and policy information for the end of June. This updated version will be published for consultation in summer 2026, with the intention to produce the final version in autumn 2026.

Examination Programme

I agree with your consideration of how the Examination programme should proceed, with the first set of hearings during the weeks commencing 14 and 21 September. I confirm that the Council supports the proposed timing for the MIQs and first stage of hearing sessions. My team is liaising with the Programme Officer to arrange a suitable venue.

I look forward to hearing from you in due course.

Yours sincerely

A handwritten signature in blue ink that reads "Dave Harris". The signature is written in a cursive, slightly slanted style.

Dave Harris
Chief Planning Officer

Appendices

Appendix A1: Draft Green Belt Review showing comments and suggested tracked changes

Appendix A2: Draft Green Belt Review – comments exported (where obscured in Appendix A1)

Appendix B: List of all documents that will be subject to consultation

Appendix A1

Draft Green Belt Review showing comments and suggested tracked changes

External Critique of Green Belt Review

Covering note

Medway Council requested LUC to undertake an independent review of Medway's Green Belt Review prepared in-house. Due to limitations of consultancy capacity within Medway's required time scales, the external critique was provided in the form of suggested track changes and comments on the 6th June 2025. The external critique assisted in ensuring compliance with the new guidance, methodology and process required in late February 2025 (NPPF and PPG).

The comments and suggested changes were considered in the compilation of the final Green Belt Review (B8) consulted upon at Regulation 19. The final Green Belt Review therefore reflects a large proportion of changes in response to the comments received through the external critique.

Green Belt Review 2025 including Grey Belt assessment

DRAFT

May 2025

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1 Introduction

1.1 Purpose of Assessment

This Green Belt Review has been prepared in response to the updated national policy requiring the identification of Grey Belt and to provide an up to date evidence to support the emerging Local Plan for Medway. This review provides an independent and objective appraisal of Metropolitan Green Belt land within Medway.

The first part of the review will focus on reviewing the 2018 Green Belt Review to determine if it remains fit for purpose or if any updates to the national guidance requires a refresh of the assessment before proceeding to the assessment of Green Belt land in the identification of Grey Belt land. Both assessments will draw heavily upon the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

1.2 Key objectives

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

1.3 Context

The extent of Green Belt land within Medway is relatively small (4.98% of land area). The outer ring Metropolitan Green belt largely terminates along the western boundary of the borough, with some limited intrusion inside the borough. The neighbouring boroughs with contiguous **Green Belt** are Gravesham and Tonbridge and Malling Borough Councils. Both these boroughs have more extensive tracts of Green Belt with their boundaries. Gravesham Borough Council will be undertaking a Green/Grey Belt Assessment to inform their emerging Local Plan. Tonbridge and Malling Borough Council have consultants reviewing their Green Belt Review against national guidance.

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

Commented [SY1]: Minor point but Green Belt as a term should always be in up case according to Gov guidance and grey belt in lower case

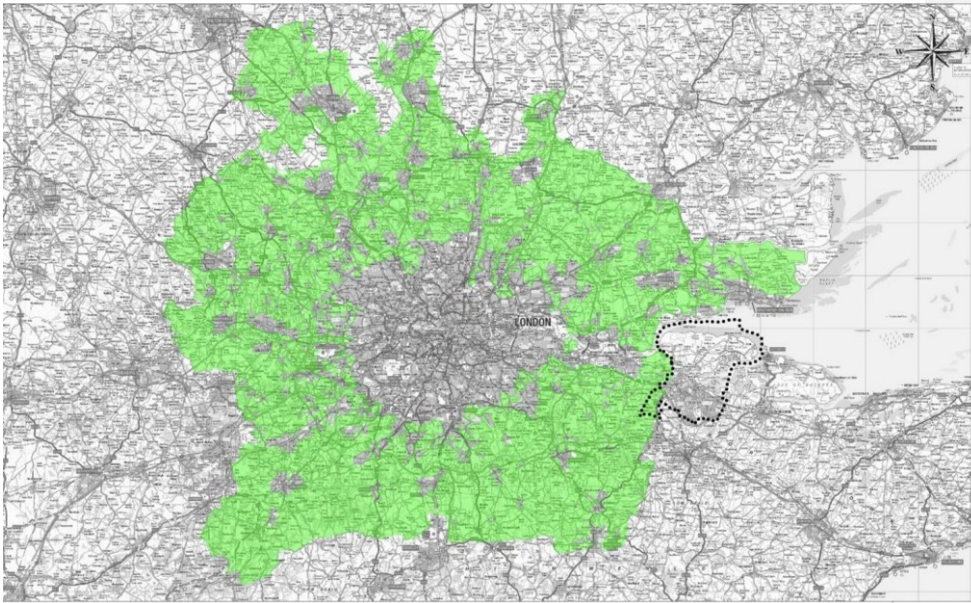


Figure 1: Metropolitan Green Belt

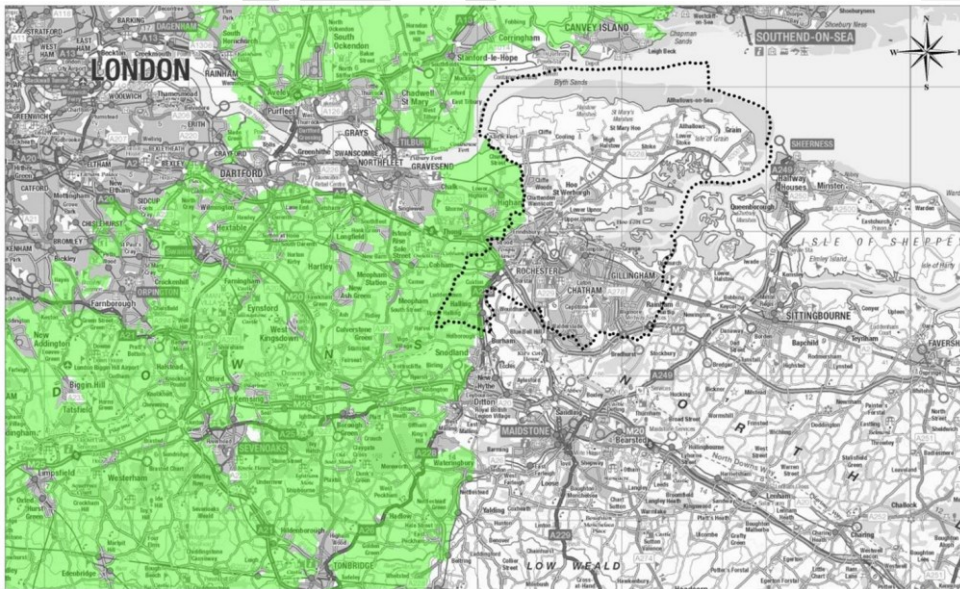


Figure 2: Metropolitan Green Belt – North West Kent

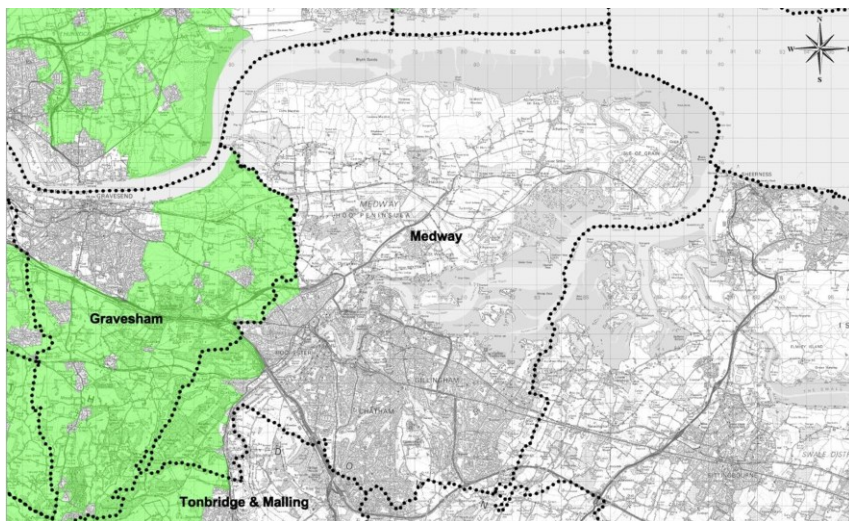


Figure 3: Metropolitan Green Belt - Medway

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2 Planning Background

2.1 National Policy

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

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

2.2 Green Belt National Policy

Government, through the NPPF, attaches great importance to Green Belts, with the fundamental aim being to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their 'openness' and 'permanence'.

The NPPF sets out the five key purposes which the Green Belt serves:

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

2.3 Local Policy

2.4 Duty to co-operate

Add text

3 Methodology

3.1 Introduction

3.2 Baseline data

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

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

3.3 Neighbouring Authorities

Add text

3.4 Land parcel identification

The 2018 Green Belt Review identified parcels for assessment based on a robust methodology of desktop analysis, site surveys, discussion with neighbouring authorities, and using well defined physical features to help define the extent of the parcels and provide distinct and permanent edges.

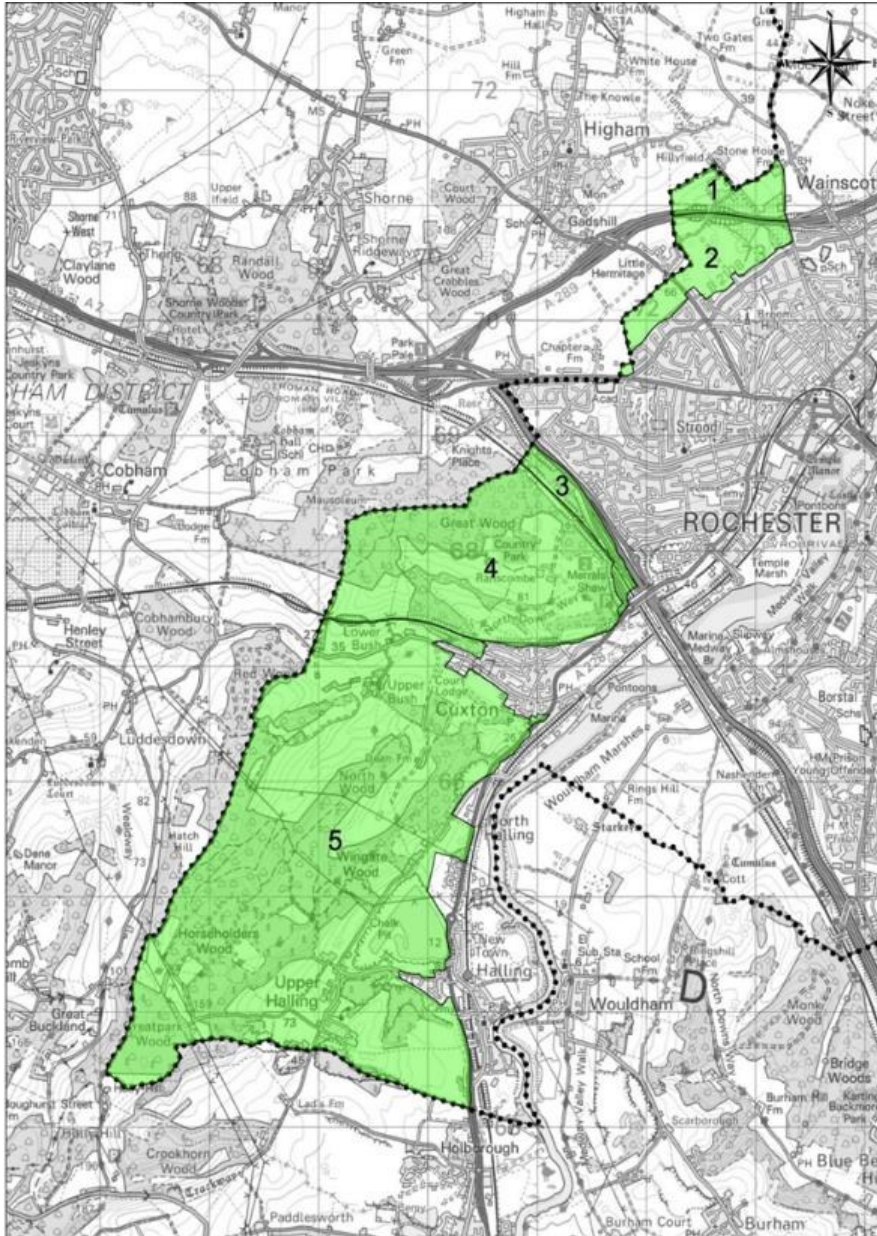
This review confirms that the parcels remain relevant and will be carried forward for the refreshed assessment. The Green Belt land parcels within Medway are confirmed as located in the following areas:

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

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

The defined parcels are intended to be both strategic and yet small enough to help inform the emerging Local Plan and site allocations where appropriate and justified. All sites were surveyed in 2017 and in 2024/25.

Commented [SY2]: This would benefit from a clearer justification on why the parcels boundaries were chosen. It will be important to note that the definition of parcel boundaries was an iterative process – ie that if significant differences in the performance of a parcel...ie within a parcel were identified, then the parcel was sub-divided. One criticism of pre-defining parcels that has been raised at Local Plan Exams is that it can lead to the averaging out of contribution ratings within a parcel which creates misleading results.



3.5 Green belt boundaries

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

3.7 Green Belt Policy Criteria

3.7.1 Green Belt Purposes

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

Purpose ~~4A~~ To check the unrestricted sprawl of large built-up areas The Medway Green Belt boundary forms the outer edge of the London Metropolitan Green Belt. The purpose as defined in the NPPF refers to 'large built up areas' and in this respect the borough's Green Belt plays a localised role in containing the outward growth of existing urban settlements. For the purposes of this study 'large built up areas' has been taken as the urban **extremities area** of Strood. Smaller village settlements such as Cliffe Woods, Cuxton and Halling are not included within this category.

Purpose ~~2B~~ To prevent neighbouring towns merging into one another Green Belt plays a strategic role in maintaining separation between main towns. In the case of Medway and Gravesend this applies particularly to the gap between the urban edge of Medway to the west and north west of Strood and the urban edge of Gravesend. **Gravesend, Strood and Medway are all treated as 'towns' for the purpose of this assessment.** As highlighted in section 1.4, this is a particularly narrow gap within the context of the full extent of the Metropolitan Green Belt. This gap also highlights the more local role of Green Belt in preventing incremental coalescence of individual urban settlements and **villages**.

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

Purpose ~~3C~~ To assist in safeguarding the countryside from encroachment Encroachment is defined as the gradual advancement of **urbanising influences**; also 'advancement beyond usual or acceptable limits'. The main consideration should be whether the rural character of the area would be threatened or overwhelmed by urbanising influences.

Purpose ~~4D~~ To preserve the setting and special character of historic towns Planning on the Doorstep (PAS 2015) states that Purpose 4 '... is generally accepted as relating to very few settlements in practice. In most towns there already are more recent developments between the historic core, and the countryside between the edge of the town.' **The historic cores of the towns of Rochester and Strood are far removed from the Green Belt boundary. Cuxton has no recognised historic core. Halling has a Conservation area at its core but this has been enveloped within more recent development and is separated from the Green Belt boundary by a railway line. Other heritage assets (eg. Listed buildings, Scheduled Ancient Monuments) which often occur randomly, are adequately protected under separate**

Commented [SY3]: It would be helpful to note that the assessment seeks to assess the contribution to the GB purposes in line with the illustrative criteria set out in the PPG. This is mentioned below but should be brought up front.

Commented [SY4]: Purposes should be referred to as A, B, C, D and E now as per NPPF

Commented [SY5]: Would be good to note that the PPG states that 'villages should not be considered large built-up areas' (PPG Paragraph: 005 Reference ID: 64-005-20250225). The implication of this is that towns and cities are large built-up areas. Also note that for the purpose of this assessment Strood is a town and has therefore been treated as a large built area.

Commented [SY6]: The NPPG makes it clear that in relation to Purpose B, that villages do not fall under this definition. Would suggest delete the reference to villages here.

Commented [SY7]: Again reference to villages could be open to challenge. Referring to preventing the coalescence between Strood and Snodland is valid.

Commented [SY8]: It might be helpful to define what you mean by urbanising influence. We define this as: 'Urbanising influence'
This is defined as a combination of both the influences of 'existing development' and 'other urbanising influences'. This includes urbanising development washed over by, inset within or directly adjacent to the outer edges of Green Belts, such as villages and hamlets, industrial, educational and/or retail estates.
Relevant factors influencing the significance of urbanising influence include separating/screening physical boundary features, the scale/visibility of urbanising development and associated land uses and activity, landform change, distance from the urban areas, and the strength of relationship with the wider countryside.

Commented [SY9]: Agree this is an acceptable conclusion re. Purpose D

Commented [RS10]: Despite this it may be worth considering whether the historic river valley setting of Strood and Rochester would be affected by development extending west beyond the ridge crest. The PPG talks about "visual, physical, or experiential relationship to historic aspects of the town". It may still have a bearing on views from the historic core, or looking down into it from high ground? This may not be the case - or may only apply to land outside of Medway - but the possibility should be addressed.

Commented [SY11]: Cuxton and Halling etc are villages and NPPG makes it clear this purpose only applies to towns.

Commented [SY12]: These do however fall under the Footnote 7 designations and should be referenced there.

legislation. Within the Medway Green Belt Review, this purpose is not considered relevant and has been discounted.

Purpose 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It is the overall restrictive nature of Green Belt that, through its limitation of the supply of other development opportunities, encourages regeneration and re-use of land. It is therefore impossible to judge how any given parcel of land would contribute to the fulfilment of this purpose.

Planning on the Doorstep (PAS 2015) states re. Purpose 5 that '... it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.' Whilst the overarching importance of Purpose 5 at a regional level is acknowledged, it is not considered helpful in considering the relative value of land parcels. For this reason it has been discounted.

3.8 Parcel Assessment

3.8.1 Appraisal criteria

The NPPF and PPG propose a new methodology and criteria to determine whether an identified parcel of Green Belt land meets purposes a, b and d, which are set out in the assessment table at Appendix C. Consideration of footnote 7 of the NPPF follows before identifying whether the land parcel could be grey belt land.

Also of importance, and included in the assessment table, is assessing if the release or development of the assessment parcel would fundamentally undermine the five Green Belt purposes taken together) of the remaining Green Belt within the Plan area as a whole. This would include assessing if the fundamental aims of the Green Belt policy are undermined, i.e. to prevent urban sprawl by keeping land permanently open.

Commented [SY13]: We were advised by barrister that we do need to include rating for purpose E but that it can be a uniform rating. This is the text we typically include in our studies. Happy for you to use this if helpful: Purpose E is not relevant to the identification of grey belt and is not referenced in the PPG, but it is one of the five purposes of Green Belt set out in the NPPF. Most Green Belt studies do not assess individual Green Belt land parcels against Purpose E, and either do not rate them or rate them all equally, on the grounds that outside the definition of PDL, it is difficult to justify why the release and/or development of one area of Green Belt land has a greater impact on encouraging re-use of urban land than another. This is supported by planning inspector's judgements on the matter, such as the inspector's report re: the London Borough of Redbridge's Local Plan (January 2018), which noted that with regards to Purpose E 'this purpose applies to most land' but that 'it does not form a particularly useful means of evaluating sites'

More generally regarding plan-making, paragraph 147 of the NPPF states that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for ...

Commented [SY14]: This could benefit from a bit more detail.

The Government's definition of grey belt land '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 PPG states in such locations, it may be necessary to only 'provisionally identify such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225). This assessment identifies land which is subject to Footnote 7 designations. For the purposes of this assessment this is taken to include: xxxx

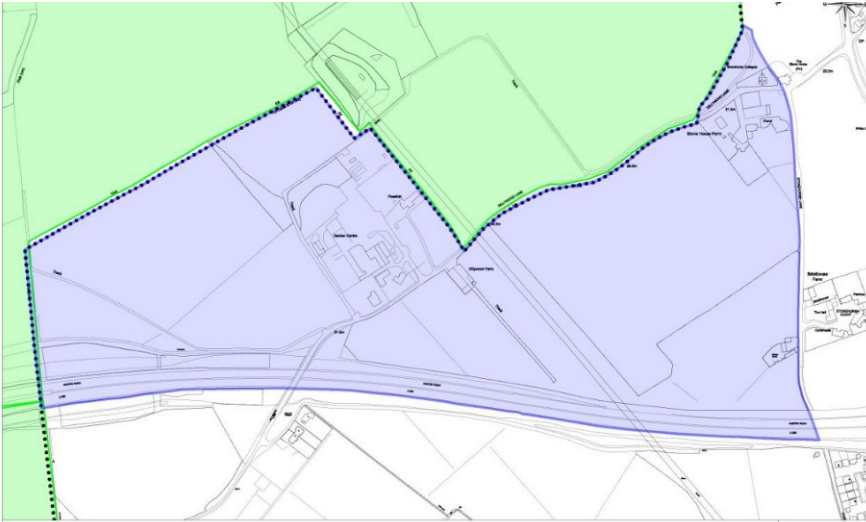
Commented [SY15]: Suggest this should be swapped with: The PPG states that this judgement should focus on evaluating the effect of release or development on 'the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'. It is not just about sprawl and openness. In the context of this study would be helpful to explain the assessment is relevant to the Medway Plan area. Also important to note 'Purposes (taken together)' Release or development that fundamentally and meaningfully impacts Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way.

You may also want to set out what a fundamental and meaningful impact may be in the context of the Medway GB.

You may also want to include a caveat that: ...

4 Parcel Assessment

4.1 Land parcel 1



4.1.1 Description

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

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

4.1.2 Assessment

Purpose	Assessment considerations
<p>Purpose A – to check the unrestricted sprawl of large built up areas</p> <p>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.</p>	<p>Strong</p> <p>Whilst not free of development, the existing form is limited and is rural in nature.</p> <p>The site is near to the built up area of Strood and is part of a group of parcels (together with parcel 2 and Green Belt in Gravesham) that directly contribute to preventing sprawl further into the Green Belt and across to Gravesham.</p> <p>The two parcels of land (1 and 2) are separated by a physical man made feature, i.e. the A289, which provides a strong physical feature to contain development on one side. There are no physical barriers to the north or west that would be able to contain development.</p> <p>If parcel 1 were to be developed, it would result in an incongruous pattern of development into the Green Belt in Gravesham and would not have any physical features to the west that could constrain development.</p>
<p>Purpose B – to prevent neighbouring towns merging into one another</p> <p>This purpose relates to the merging of towns, not villages.</p>	<p>Strong/Moderate</p> <p>This parcel is located between Strood and Gravesend centres.</p> <p>It forms just a small part of the gap between these towns.</p> <p>Development of this parcel would not result in the merging of the towns, however, it is part of a group of land parcels (together with parcel 2 and Green Belt in Gravesham) that directly contribute to preventing the merging of these two towns.</p> <p>The natural landscape and topography of Shorne Woods Country Park, Shorne Ridgeway and Great Crabbles Wood create a natural visual separation between these two towns with limited to no visibility from Gravesend town. Parcel 1 forms part of this landscape that is visible from Strood in creating that visual separation and is therefore important to keep clear of built form.</p>
<p>Purpose D – to preserve the setting and special character of historic towns</p> <p>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed</p>	<p>N/A - No historic towns</p>

Commented [RS16]: A strong contribution to Purpose A, B or D means that the parcel is not grey belt, so giving ratings of 'strong/moderate' introduces some ambiguity that could cause difficulties when justifying the grey belt judgement. In this particular instance Purpose A = strong so land is not grey belt but for some other parcels the highest rating is strong/moderate. We would advise coming down on one side of the fence or the other.

Commented [RS17]: Given that the parcel (along with Parcel 2, assuming that would also be developed) forms such a small part of the gap I think it is hard to argue that it could meet the PPG's criteria for a strong rating. The PPG wording suggests that moderate is appropriate here (especially given the presence of intervening higher, wooded ground).

Commented [SY18]: Purpose C assessment seems to be missing. This should be included as otherwise you can't assess fundamental impact on all GB purposes – which includes Purpose C.

assessments against this purpose.	
Consideration of footnote 7	The Kent Downs and National Landscape designation sits to the southwest of the parcel but a fair distance away, therefore not within the designation or within its setting. A SSSI also sits to the west of the parcel but is also a distance away to not have an impact. Footnote 7 would not apply in this case.
5 purposes of Green Belt all together including to prevent urban sprawl by keeping land permanently open.	Parcel 1 together with Gravesham Green Belt north and north west of the A289 strongly assist in safeguarding the countryside from encroachment. The A289 forms a strong barrier preventing any further urbanising influences from advancing into the established Green Belt. These parcels together address the fundamental aim of the Green Belt policy in keeping land permanently open.
Result	Strong contribution
Grey Belt	No

Commented [RS19]: The PPG indicates that footnote 7 areas/assets which don't make a strong contribution to A, B or D should be regarded as provisional grey belt, as the judgement as to whether development would be contrary to relevant policies may depend on the type of development proposed. We would suggest mapping footnote 7 areas rather than making any judgement on their applicability at this stage, although it's fine to mention them here. This is what we have been advised by a barrister to do.

Commented [RS20]: Although the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, the PPG requires consideration as to whether proposals would "fundamentally undermine the five Green Belt purposes (taken together) of remaining Green Belt in the plan area". This is difficult to judge without having specific proposals to consider, and the effects could be cumulative relating to a set of proposed allocations, but we have been advised by a KC that a strategic assessment should nonetheless comment on any potential for development to fundamentally undermine the purposes.
Could the judgement be rephrased to consider whether development in this parcel would be significant enough to fundamentally undermine the purposes across the plan area? Loss of any Green Belt land would be contrary to the aim of keeping land permanently open, but it would have to be a substantial impact to mean the 'fundamentally undermine' test - although our interpretation is that this doesn't mean that a parcel has to strongly contribute to all of the purposes.

4.1.3 Boundary anomalies

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

4.1.4 Other planning considerations

Local Plan Policy Designations

Protection of Open Space Policy L3; Area of Local Landscape Importance Policy BNE34; Rural Lanes BNE47

Relevant Planning Decisions

- Water Gardens & Landscape Centre, Dillywood Lane, Higham, ME3 7NT

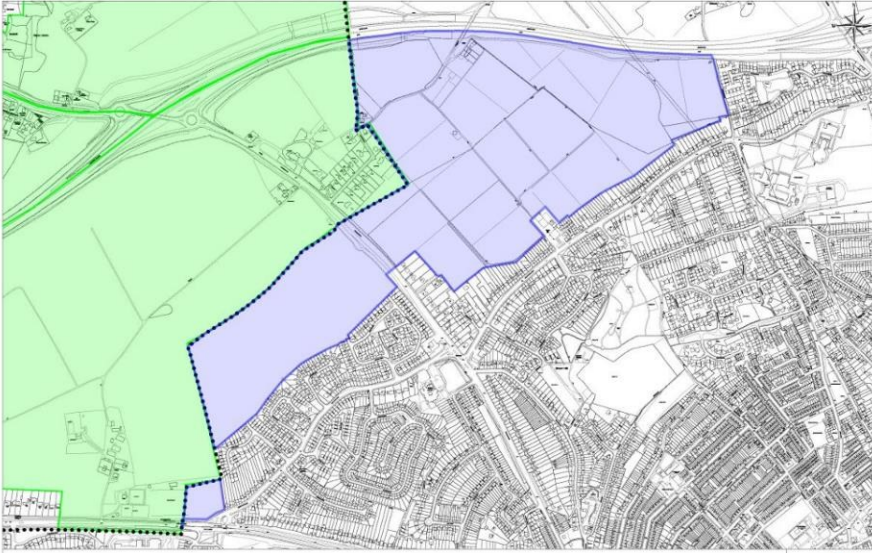
MC/10/0267 Construction of a 5 bedroomed dwelling ancillary to the garden centre with detached garage / workshop and meeting room. Refused, 02 July 2010. No appeal.

4.1.5 Results and recommendation

Strong – This contribution is considered to be significant

Recommendation – No change to Green Belt status. Amendment to boundary anomaly

4.2 Land Parcel 2



4.2.1 Description

This parcel is situated to the south of the A289 within grade 1 agricultural land and the Dillywood Lane Area of Local Landscape Importance (ALLI). This connects with the Gravesham ALLI and helps to prevent a separate identity to Higham, i.e. rural landscape next to an urban area.

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

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

4.2.2 Assessment

Purpose	Assessment considerations
<p>Purpose A – to check the unrestricted sprawl of large built up areas</p> <p>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.</p>	<p>Moderate</p> <p>Parcel 2 sits south of the A289, adjacent to Strood and also cuts across the A226 (Gravesend Road). The parcel consists of farming land and remains untouched by development. There isn't a robust barrier to the western boundary that would prevent sprawl. Development can therefore be contained by only the A289, but could lead to further development into GBC land within the confines of the A289, A2 and M2.</p> <p>Part of the parcel that sits east of Gravesend Road has a complex landscape consisting of grade 1 agricultural land. It has a different quality (valuable farming land used for cultivation) and appears quite rural. From the A226 the land slopes downward in an easterly and north easterly direction, which creates an openness with views across to the Thames Port. Further east (eastern corner) has been used as an orchard. The character is slightly different, drops dramatically and does not have a substantial barrier to muffle the noise emanating from the A289. It is quite isolated being treelined. Development could be self-contained.</p> <p>Parcels further north around Dillywood lane appear very rural and secluded and are sensitive in landscape and heritage terms. This part of the land parcel is separated by the A289 and Gravesend Road.</p> <p>Land to the west of Gravesend Road is part of a wider grouping of Green Belt land in GBC. In isolation, the western part of parcel 2 adds little value given the quality of landscape. It is largely self-contained with a treelined border. The landscape slopes down from the A226 westward. Land outside the site on the western end then starts to rise again, so the site is well screened and can be described as almost sitting in a bowl/isolated.</p> <p>It is important that this parcel is assessed together with the Gravesham parcels of land in the Green Belt that sit immediately adjacent to the east. When assessed as part of the wider parcels of Green Belt within Gravesham BC which are bound by the A289, A2 and M2, this part of parcel 2 works together in preventing sprawl. It's value therefore</p>

Commented [RS21]: Not relevant to GB assessment. Best to delete so people don't challenge why it has been included.

Commented [RS22]: If the implication is that this area makes a weaker contribution, should consider whether this ought to be a separate parcel. A common challenge from developers is that the ratings would've been different if a smaller parcel had been defined.

Commented [RS23]: Isn't Parcel 2 all to the south of the A289?

Commented [RS24]: This isn't relevant to Green Belt contribution.

	<p>lies in being part of the wider parcels collectively.</p> <p>Dependencies Together parcel 2 performs a strong function with the rest of the Green Belt (including across the A289) to the west and north in preventing sprawl. However, due to the land (Parcel 2 and GBC land) being bound by the A289, A2 and M2, parcel 2 has a linked value as part of a wider grouping of land with GBC land.</p> <p>Whilst each part can be read alongside the Green Belt land across the A289, the A289 provides a strong barrier that would allow for any development of this land to be self-contained.</p> <p>Therefore, if GBC land in this location were to come forward for development:</p> <ul style="list-style-type: none"> • parcel 2 would add little value in performing the Green Belt function in isolation • land in GBC would have eroded the gap between Strood and the A289, thereby setting a precedent for parcel 2 to come forward • development in GBC would be the urbanising influence to the west, bound by the A289, A2 and M2, which together with the A289 to the north would be suitable to contain development without impacting on the wider Green Belt beyond the A289.
<p>Purpose B – to prevent neighbouring towns merging into one another This purpose relates to the merging of towns, not villages.</p>	<p>Moderate Parcel 2 forms a small part of a gap between Strood and Gravesend. Development of this parcel would not result in the merging of the towns, however, it is part of a group of land parcels (together with parcel 1 and Green Belt in Gravesham) that directly contribute to preventing the merging of these two towns.</p> <p>The natural landscape and topography of Shorne Woods Country Park, Shorne Ridgeway and Great Crabbles Wood create a natural visual separation between these two towns with limited to no visibility from Gravesend town. However, there may be areas of sensitivity that will need to be addressed should this land come forward for development.</p>
<p>Purpose D – to preserve the setting and special character of historic towns</p>	<p>No – no historic towns This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be</p>

Commented [RS25]: We would suggest that the assessment is focused on land within Medway, although it is important that impact on land in Gravesham is taken into account and to do that there does need to be consideration of whether adjacent land in Gravesham makes a stronger contribution, and whether that would be weakened by development of land in Medway.

Commented [RS26]: I agree that development of adjacent land in Gravesham would weaken this parcel's contribution, but is this study required to assess the impact of development in another local authority area? In effect that means you are assessing land in Gravesham, which would be something Gravesham should be considering in their GB study? If part of the methodology is to consider the impact that development in Gravesham would have on land in Medway then it should be stated in the method section and for consistency it should be applied to all parcels bordering land in Gravesham?

Commented [RS27]: The contribution of this parcel should be assessed in isolation (although for Parcel 1 it is reasonable to assume that its development would be part of an expansion of Strood that would include intervening land in Parcel 2).

	necessary to provide detailed assessments against this purpose.
Consideration of footnote 7	The Kent Downs and National Landscape designation sits to the west of the parcel. The western part of the site may need to address the setting of the KDNL as per paragraph 189 of the NPPF. A SSSI also sits to the west of the parcel but is also a distance away to not have an impact. Footnote 7 would not apply in this case.
5 purposes of Green Belt all together including to prevent urban sprawl by keeping land permanently open.	Parcel 2 performs a strong function with GBC Green Belt land to the west and north. If GBC land remained untouched, the value of parcel 2 would remain strong toward the function of the Green Belt and keeping land open. However, if land in GBC were to be brought forward for development through their Green Belt review, the value and ability of the parcel 2 (east) would be limited. This would have knock on effects for the rest of parcel 2 due to the strong performing barrier function of the A289 together with the urbanising influence of potential GBC development, i.e. land parcel 2 is dependent on GBC land within the confines of the A289, A2 and M2 in this location remaining designated as Green Belt.
Result	Isolation: Moderate/Strong Part of GBC within A289: Moderate
Grey Belt	Isolation: parcel 2 (east) Yes, parcel to (west) Yes as a consequence Part of GBC within A289: Yes (can be self contained within A289 confines)

Commented [RS28]: This contradicts the moderate ratings assigned to Purposes A and B.

Commented [RS29]: Whilst this might all be true the focus should in the first instance be on impact of release of land in Medway. The conclusion might be that Parcel 2 does not have a strong boundary to restrict and contain development, so it's release would in turn weaken the contribution of land in Gravesham, but also that the area as a whole is subject to urbanising influence and is contained by a strong boundary feature (i.e. A289). So in effect you are assessing the land in Gravesham as well but without parcelling and rating it.

Commented [RS30]: It 'isolation' is referring to just Parcel 2 it seems strange that it would rate stronger than the GBC part, especially when Purpose A and B are both rated moderate. We would suggest not rating the GBC bit anyway and, as noted above, we would suggest avoiding using moderate/strong (or strong/moderate) as a rating.

4.2.3 Other planning considerations

Local Plan Policy Designations

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

Relevant Planning Decisions

- Brompton Farm, Brompton Farm Road, Strood, ME2 3QZ

MC/11/2757 Outline application for demolition of existing farm buildings and construction of 16 dwellings together with access, appearance, layout and scale and associated works.

Approval subject to S.106, 04 April 2013

- No.178 and Land North of Brompton Farm Road, Strood

MC/16/2917 Outline application with some matters reserved (appearance, landscaping, layout, scale) for residential development comprising of up to 135 residential dwellings with associated landscaping, public open space and associated works.

Refusal, 20 January 2017. No appeal.

MC/17/2956 Outline application with some matters reserved (appearance, landscaping, layout, scale) for residential development comprising of up to 122 residential dwellings with associated landscaping, public open space and associated works.

Refused 19 April 2018. Appealed.

- Rochester United F.C., Watling Street

MC/17/3121 Retrospective application for the construction of a 192 seat stand together with the installation of two portakabins for admin and football academy.

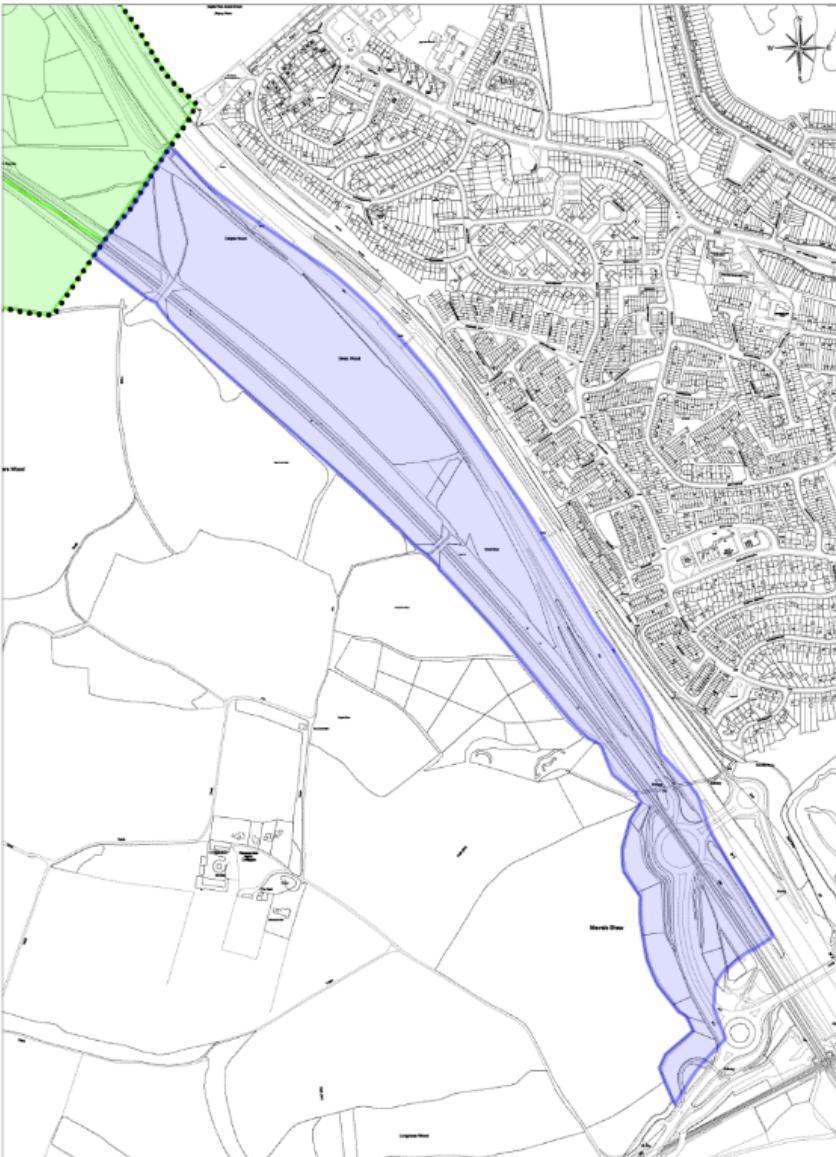
Approved with Conditions, 16 April 2018

4.2.4 Results and recommendation

Isolation: Moderate/Strong

Part of GBC within A289: Moderate

4.3 Parcel 3



4.3.1 Description

This parcel forms a narrow sliver of land bounded by the M2 and CTRL. The north and south eastern edges of this parcel form the outer Metropolitan Green Belt boundary. Land to the south west conjoins with Parcel 4 and flows into Gravesham to the north west. Woodland predominates as the land use within this parcel. A motorway underpass provides an important public right of way link from the urban area of Strood to the north into the AONB woodland and chalk downland to the south. There are permissive rights of way running parallel to the motorway and CTRL line. Urbanising influences include the M2, CTRL line and A228. As noted in relation to Parcels 1 and 2, this parcel, although assessed independently, should also be considered integrally with Parcels 4 and 5. The parcels have common features that extend into the green belt in neighbouring boroughs to the west and south.

4.3.2 Assessment

Purpose	Assessment considerations
<p>Purpose A – to check the unrestricted sprawl of large built up areas This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.</p>	<p>Moderate/Strong This parcel sits adjacent to Strood, but is separated from the built up area by the M2, i.e. it works with the M2 to provide a strong separation and barrier to development extending beyond Strood. Parcel 3 does sit between the M2 and the railway line, which provide strong barrier to preventing further growth beyond. Whilst the parcels bounds form a distinctive break between the urban area of Strood and the countryside, development on this sliver of land between a motorway and railway line would not provide suitable amenity conditions for residential development. Together with parcels 4 and 5, parcel 3 performs a wider function. And should be assessed in line with the wider function in order to understand its importance. IN this case parcel 3 plays an important role with parcels 4 and 5 in preventing sprawl.</p>
<p>Purpose B – to prevent neighbouring towns merging into one another This purpose relates to the merging of towns, not villages.</p>	<p>Moderate/Strong Parcel 3 forms part of a gap between towns, but a small part. The motorway provides a robust separation from Strood. Parcel 3 is totally free of development. The Green Belt is overlapped significantly by the Kent Downs National Landscape designation making this area very sensitive to development. Together with parcels 4 and 5, parcel 3 would lead to the merging of these two towns. Parcel 4 (contains Ranscombe Farm Nature Reserve) sits south of Strood and the M2.</p>

- Commented [RS31]:** Parcel 3 should be assessed in isolation. Although it is contained by the railway our interpretation of the PPG is that the fact that development here would breach a strong boundary (the M2) would make it incongruous with the urban pattern. The current settlement edge is restricted and contained by the M2, so development crossing this would breach that containment.
- Commented [RS32]:** Parcel 3 in isolation is a very small part of the gap and visually contained, so should rate weak in line with PPG.
- Commented [RS33]:** Should specify the other town - presumably Snodland?
- Commented [RS34]:** This isn't relevant to Purpose 2 specifically - if this land was identified as not making a strong contribution to A, B or D it would mean that it would be provisional grey belt - subject to consideration as to whether development would harm the special qualities of the National Landscape.

	<p>Parcel 3 sits south of the M2 but between parcel 4 and the M2. Parcels 3 and 4 form a smaller part of the gap between these towns but remain quite important looking across all three parcels.</p> <p>Parcel 5 is a larger parcel and therefore performs a stronger role.</p> <p>Therefore as a grouping of parcels, this parcel performs a wider function preventing the merging of Strood with Snodland and as such performs an important function in ensuring that the towns are separated physically and visually.</p>
Purpose D – to preserve the setting and special character of historic towns	<p>N/A – no historic towns</p> <p>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.</p>
Consideration of footnote 7	<p>Parcel 3 overlaps with the Kent Downs National Landscape designation. Where the overlap does exist with the Kent Down National Landscape (KDNL), footnote 7 will need to be addressed fully (NPPF para 189) demonstrating the sensitive nature of this area. Great weight is attached to the KDNL and will require significant consideration of conservation and enhancements.</p>
5 purposes of Green Belt all together including to prevent urban sprawl by keeping land permanently open.	<p>In addition, parcel 3 does safeguard the countryside from encroachment when considered together with parcels 4 and 5, i.e. prevents urban sprawl by keeping land permanently open and thereby addresses Green Belt policy</p>
Result	Moderate/Strong
Grey Belt	No – when considered against the 5 purposes of Green Belt and as part of a grouping of parcels

Commented [RS35]: Would recommend not doing this cumulative assessment here - see comments under Parcels 4 and 5.

Commented [RS36]: Should present some criteria in the methodology for assessing Purpose C.

Commented [RS37]: I think it's enough to say that it's not grey belt because of strong contribution to Purpose A - breaching a strong and consistent urban edge boundary (the M2).

4.3.3 Other planning considerations

Local Plan Policy Designations

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

Relevant Planning Decisions

None relevant

4.3.4 Results and recommendation

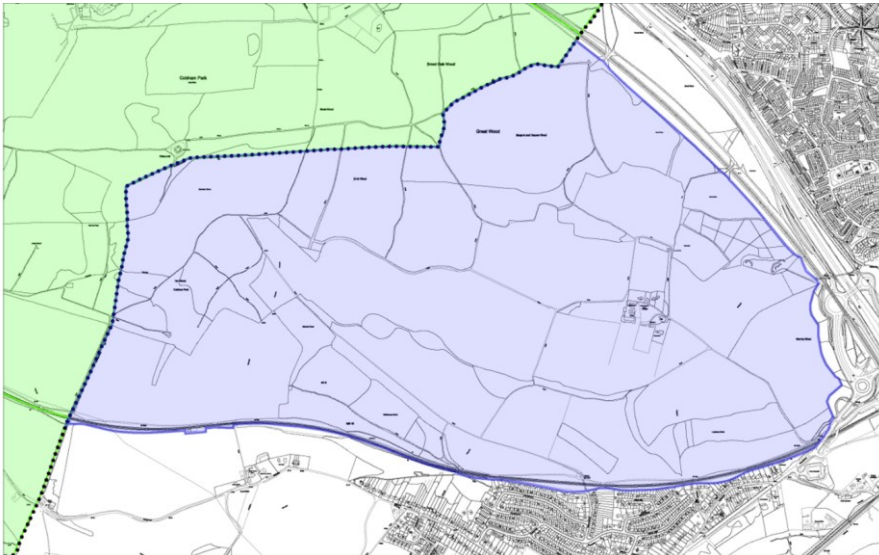
Moderate/Strong: Whilst the performance against purposes a, b and d suggest it could be grey belt, when considered against the 5 Green Belt purposes as a whole, this parcel

performs an important function in combination with parcels 4 and 5. Its contribution is still considered to be significant.

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

DRAFT

4.4 Parcel 4



4.4.1 Description

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

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

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

Characteristic features of the area include some large blocks of woodland, particularly to the north, as well as areas of grassland and arable farmland. The Reserve is managed primarily for biodiversity conservation and informal public recreation. Active management includes coppicing and management of woodland open space, grazing and other forms of grassland management, and cultivation to favour the rare cornfield wildflowers for which the site is

nationally important. Ten miles of paths and ten different entrance points are maintained and kept safe and passable, with substantial lengths open to horse and cycle use. Commercial arable farming remains a significant use of the site, and some commercial rearing of livestock also occurs, both delivered by a tenant farmer.

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

Commented [RS38]: There's a lot of info here which, whilst relevant to the broader consideration of sustainability and impact of development, isn't relevant to Green Belt contribution.

4.4.2 Assessment

Purpose	Assessment considerations
<p>Purpose A – to check the unrestricted sprawl of large built up areas</p> <p>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.</p>	<p>Moderate/Strong</p> <p>This parcel sits adjacent to Strood and is separated from the built up area by parcel 3 and the M2.</p> <p>Parcel 4 does sit adjacent and south of parcel 3. It is bound by parcel 3 to the north and east, green belt to the west (Gravesham BC) and a railway line to the south. The railway line to the south provides a strong barrier that could allow for contained development moving south. There are however, limited natural features to the west that would help to contain development. Development could expand to the north (if parcel 3 were developed) but then would be bound by the railway line and the M2. Parcel 4 should therefore be read with parcel 3 and then across with parcel 5 in preventing sprawl.</p> <p>Together with parcels 3 and 5, parcel 4 performs a wider function. And should be assessed in line with the wider function in order to understand its importance. In this case parcel 4 performs an important function in preventing sprawl.</p>
<p>Purpose B – to prevent neighbouring towns merging into one another</p> <p>This purpose relates to the merging of towns, not villages.</p>	<p>Moderate/Strong</p> <p>Parcel 4 does sit near to Strood and forms a small part of a larger gap between Strood and Snodland. On its own it does not prevent the merging of towns, but as part of a group of parcels (3, 4 and 5) perform a strong function in preventing the merging of these two towns.</p> <p>Parcel 4 (contains Ranscombe Farm Nature Reserve) sits south of Strood and the M2. Parcel 3 sits south of the M2 but between parcel 4 and the M2. Parcels 3 and 4 form a smaller part of the gap between these towns but remain quite important looking across all three parcels. Parcel 5 is a larger parcel and therefore performs a stronger role.</p>

Commented [RS39]: This is quite complicated. Development needs to be considered in the context of expansion of Strood (where it would be significant sprawl, extending beyond the M2 and the railway line) but also expansion of Cuxton (where it would also be crossing a strong and consistent boundary feature: another railway line). We would usually recommend defining separate parcels adjacent to each inset settlement, to assess contribution in the context of their expansion, but in this case the homogeneous character of the parcel and the similarity in terms of contribution means that, in my opinion, it would rate strong for Purpose A in relation to both settlements. I don't think the wider function with parcel 5 needs to be considered here.

Commented [RS40]: We could consider it in isolation (as an expansion of Cuxton) or in combination with release of Parcel 3 as an expansion of Strood. Either way it is a small part of the gap so I don't think it can rate more than moderate, and shouldn't consider it an association with parcel 5.

	Therefore as a grouping of parcels, this parcel performs a wider function preventing the merging of Strood with Snodland and as such performs an important function in ensuring that the towns are separated physically and visually.
Purpose D – to preserve the setting and special character of historic towns	N/A – no historic towns This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.
Consideration of footnote 7	Parcel 3 overlaps with the Kent Downs National Landscape designation. Where the overlap does exist with the Kent Down National Landscape (KDNL), footnote 7 will need to be addressed fully (NPPF para 189) demonstrating the sensitive nature of this area. Great weight is attached to the KDNL and will require significant consideration of conservation and enhancements.
5 purposes of Green Belt all together including to prevent urban sprawl by keeping land permanently open.	In addition, parcel 4 does safeguard the countryside from encroachment when considered together with parcels 3 and 5, i.e. prevents urban sprawl by keeping land permanently open and thereby addresses Green Belt policy.
Result	Moderate/Strong
Grey Belt	No – when considered against the 5 purposes of Green Belt and as part of a grouping pf parcels.

4.4.3 Other planning considerations

Local plan policy designations

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

Relevant Planning Decisions

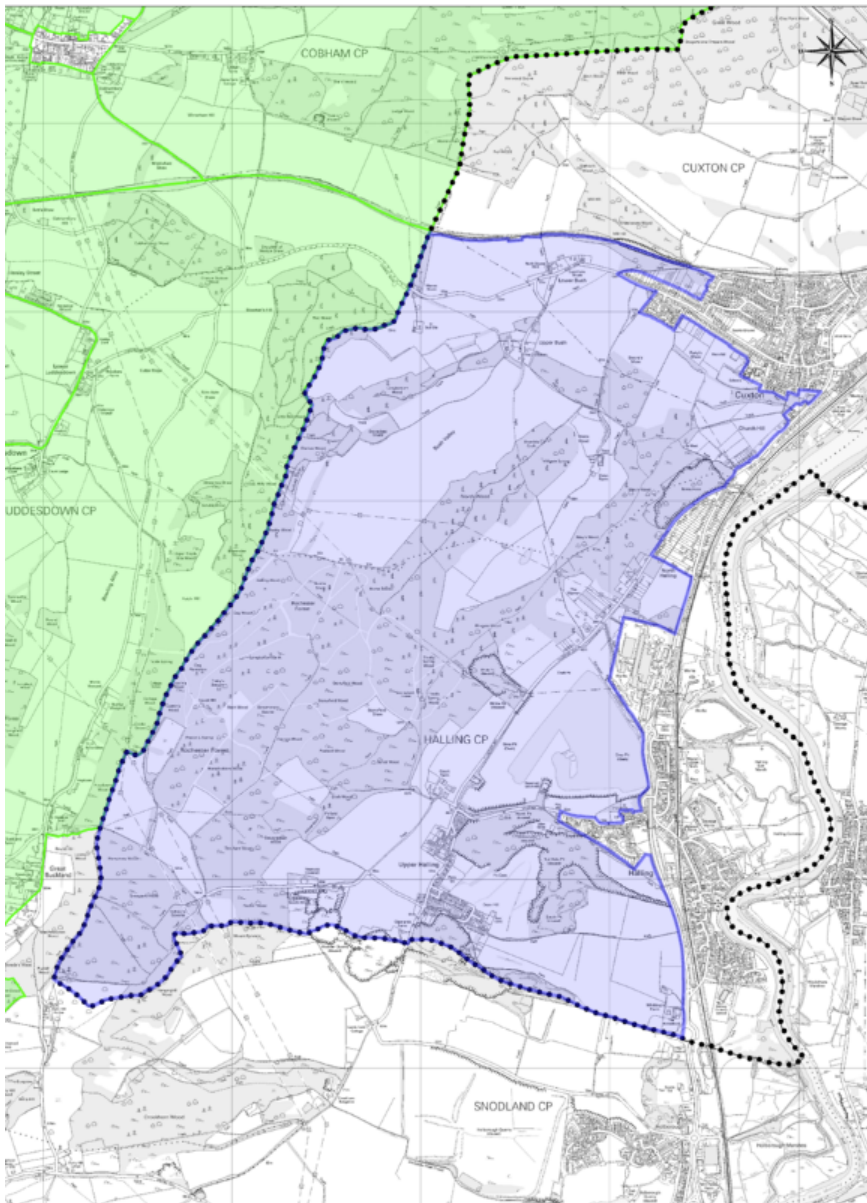
In recent years a number of planning applications have been submitted and approved for smaller scale developments within the curtilage of the original Ranscombe farmstead.

4.4.4 Results and recommendation

Moderate/Strong: The contribution is considered to be significant.

Recommendation: No change to Green Belt

4.5 Parcel 5



4.5.1 Description

This is the largest of the three contiguous land parcels (nos 3, 4 & 5). The eastern edges of this parcel bound the A228 and the urban edges of Cuxton and Halling and form the outer Metropolitan Green Belt boundary. Green Belt land to the south flows into Tonbridge and Malling and to the west into Gravesham.

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

Commented [RS41]: This large parcel doesn't distinguish variations in contribution in relation to the different settlements it adjoins. There are potentially locations where smaller releases of land would only affect land that is already subject to urbanising influence - e.g. at North Halling north of the recent development north of St Andrews Lakes?

4.5.2 Assessment

Purpose	Assessment considerations
<p>Purpose A – to check the unrestricted sprawl of large built up areas</p> <p>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.</p>	<p>Strong</p> <p>Whilst not totally free of development, the existing built form is limited and is rural in nature, i.e. Upper Bush and Upper Halling. The Green Belt is overlapped significantly by the Kent Downs National Landscape designation making this area very sensitive to development. The site is near to the built up area of Snodland and is part of a group of parcels (together with Green Belt in Gravesham and Tonbridge & Malling) that directly contribute to preventing sprawl further into the Green Belt and across to these two authorities. The parcel has some urbanising features to the east appearing in the form of the A228 and ribbon development of villages. This boundary is reinforced to the east by the River Medway, a strategic gap policy and the continuation of the AONB. All in combination provide a very strong policy position to guide development.</p> <p>If parcel 5 were to be developed, it would result in an incongruous pattern of development into the Green Belt in Gravesham and Tonbridge & Malling. The landscape and topography across the site can be very open in some places, which have an impact on views. The nature of the area and</p>

Commented [RS42]: To rate all of this parcel strong you would need to demonstrate firstly that Purpose A is relevant - i.e. that all the land here is 'close to' a large built-up area - and secondly that there aren't any locations where expansion would not meet the requirements of a strong contribution. Otherwise you will be open to the challenge that if you had defined smaller parcels in some locations your findings would have been different.

Commented [RS43]: Strood is the only settlement defined as a large built-up area so for Purpose A to be relevant you will need to justify that expansion of Halling, North Halling or Cuxton would be associated with the sprawl of Strood. If Snodland is defined as a town, however, you could also consider this a large built-up area (noting that the PPG just says that 'villages should not be considered large built-up areas'), strengthening the case for saying that expansion of settlements in this chain along the A228 is associated with a large built-up area.

	its sensitivity remains a key consideration.
Purpose B – to prevent neighbouring towns merging into one another This purpose relates to the merging of towns, not villages.	Strong Whilst not totally free of development, the existing built form is limited and is rural in nature, i.e. Upper Bush and Upper Halling. The Green Belt is overlapped significantly by the Kent Downs National Landscape designation making this area very sensitive to development. Together with parcels 4 and 3, parcel 5 would lead to the merging of these two towns. Parcel 4 (contains Ranscombe Farm Nature Reserve) sits south of Strood and the M2. Parcel 3 sits south of the M2 but between parcel 4 and the M2. Parcels 3 and 4 form a smaller part of the gap between these towns but remain quite important looking across all three parcels. Parcel 5 on its own forms a significant part of gap between Snodland and Strood. This parcel therefore performs a strong role in ensuring neighbouring towns are separated physically and visually on its own and more importantly as part of a bigger grouping of parcels.
Purpose D – to preserve the setting and special character of historic towns	N/A – no historic towns This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.
Consideration of footnote 7	The majority of parcel 5 overlaps with the Kent Downs National Landscape designation, with the exception of the eastern boundary which sits alongside the most urbanising influences. Where the overlap does exist with the Kent Down National Landscape (KDNL), footnote 7 will need to be addressed fully (NPPF para 189) demonstrating the sensitive nature of this area. Great weight is attached to the KDNL and will require significant consideration of conservation and enhancements. The part of parcel 5 that does not overlap with the KDNL but sits within its setting will also need to address NPPF paragraph 189, i.e. should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
5 purposes of Green Belt all together including to prevent urban sprawl by keeping land permanently	In addition, parcel 5 does safeguard the countryside from encroachment. There does appear to be strong and robust boundaries of the parcel that would contain development in the long term.

Commented [RS44]: In reality any proposals for development are likely to be for a small proportion of land in this parcel, not for release of all of it. If you define smaller parcels adjacent to the inset settlements it is likely that there will be some locations that do not meet the PPG criteria for a strong contribution to Purpose B.

open.	Parcel 5 either together with parcels 3 and 4 or in isolation prevents urban sprawl by keeping land permanently open and thereby addresses Green Belt policy.
Result	Strong
Grey Belt	N

Commented [RS45]: We recommend that smaller parcels are defined adjacent to all inset settlements, and adjacent to North Halling if it is considered too lacking in openness to retain its Green Belt status.

4.5.3 Washed over and inset areas

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

4.5.4 Other Planning Considerations

Local Plan Policy Designations

Upper Bush Conservation Area BNE12, BNE13, BNE14, BNE15; **Scheduled Ancient Monument BNE20;**

Strategic Gap BNE31

Kent Downs Area of Outstanding Natural Beauty BNE32 and; North Downs Special Landscape Area

BNE33; Sites of Special Scientific Interest/National Nature Reserve BNE35 (excluding areas below Mean High Water);

Sites of Nature Conservation Interest and/or Local Nature Reserve BNE36 (existing/proposed); Proposed

Community Forest or Woodland BNE44; Rural Lanes BNE47

Relevant Planning Decisions

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

and landscaping; open space; nature conservation facilities; ground modelling and earthworks and ancillary buildings. Approval With Conditions, 29 August, 2013

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

- 98 Pilgrims Road, Upper Halling MC/17/3288 Retrospective application for the formation of a riding ménage to the rear. Approved with Conditions, 22 December 2017 • Land Rear Of 106,108,110,112 and 114 And Adjacent 98 Pilgrims Road, Upper Halling MC/17/3788 Retrospective application for construction of an access road and driveway. Approved with Conditions, 18 January 2018 • Dean Farm Cottage, Bush Road MC/18/0236 Change of use from outbuilding to a 2 bedroom dwelling. Refused, 28 November 2018 • Keepers Barn, Upper Bush Farm Road, Upper Halling MC/18/1405 Change of use of redundant agricultural barn to a residential dwelling. Pending Decision • M.C.L Ltd, Grove Road, Upper Halling MC/18/2040 Outline planning application with some matters reserved (access, appearance, landscaping and scale) for the demolition of existing industrial buildings, builders yard and the construction of 11 dwellings, associated parking, car ports and access. Pending Decision

4.5.5 Results and recommendation

Strong: this contribution is considered to be significant

Recommendation: Adjustments to 'inset' or 'washed over' status of settlements for further consideration.

5 Assessment Summary

5.1 Introduction

Parcels 1 & 2 and Parcels 3, 4 & 5 have been split up based on the proximity of parcels to one another and needing to consider them as groups, but also reflecting against the landscape being separated by strong barriers or barriers that required consideration.

All land parcels were part of contiguous and continuous belts of green belt land that flow across into neighbouring authorities of Gravesham and Tonbridge & Malling.

The assessment process assessed parcels individually but also as part of a wider groups of parcels.

5.2 Site survey work

Assessment work began in December 2024 alongside site visits. In total three site visits were undertaken and attended by the Council's landscape and planning policy officers.

The review of Medway Green Belt land was guided by the methodology described in this report. All Green Belt land was reviewed in terms of definition by strong and permanent physical features.

All site visits included discussion of green belt related issues and the completion of the purpose and aims pro formas for each land parcel.

5.3 Assessment Results – Summary Table

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

Commented [RS46]: Whilst it is reasonable to summarise the role of Green Belt land at a grouped parcel level the assessment should ideally be helpful in identifying grey belt land at a more localised level - e.g. for speculative development proposals.

Commented [RS47]: The absence of strong physical features doesn't necessarily mean that there will not be variations at a smaller scale. In our view, parcels should be defined to reflect variations in contribution to the purposes, and these variations may be defined by boundary features that are not 'strong'.

A minimum parcel size could be stated - LUC's studies typically define a minimum somewhere between 1 and 10 hectares (although most parcels would be much larger than the minimum).

Commented [RS48]: It's not clear what this 'aims' rating is.

Commented [RS49]: A conclusion as to whether the parcel is grey belt would be helpful.

6 Boundary anomalies

6.1 District boundary

There is no Green belt land within Medway to the north of Strood - between Stone House Farm and Higham Creek. The Green Belt boundary in this section is synonymous with the district boundary between Gravesham and Medway. A comprehensive survey of this boundary has been undertaken, in order to ensure that it is clearly defined by distinctive physical features - as per NPPF guidance. This survey work has identified some anomalies. Proposed amendments/options are listed and mapped below (see figs 10-12):

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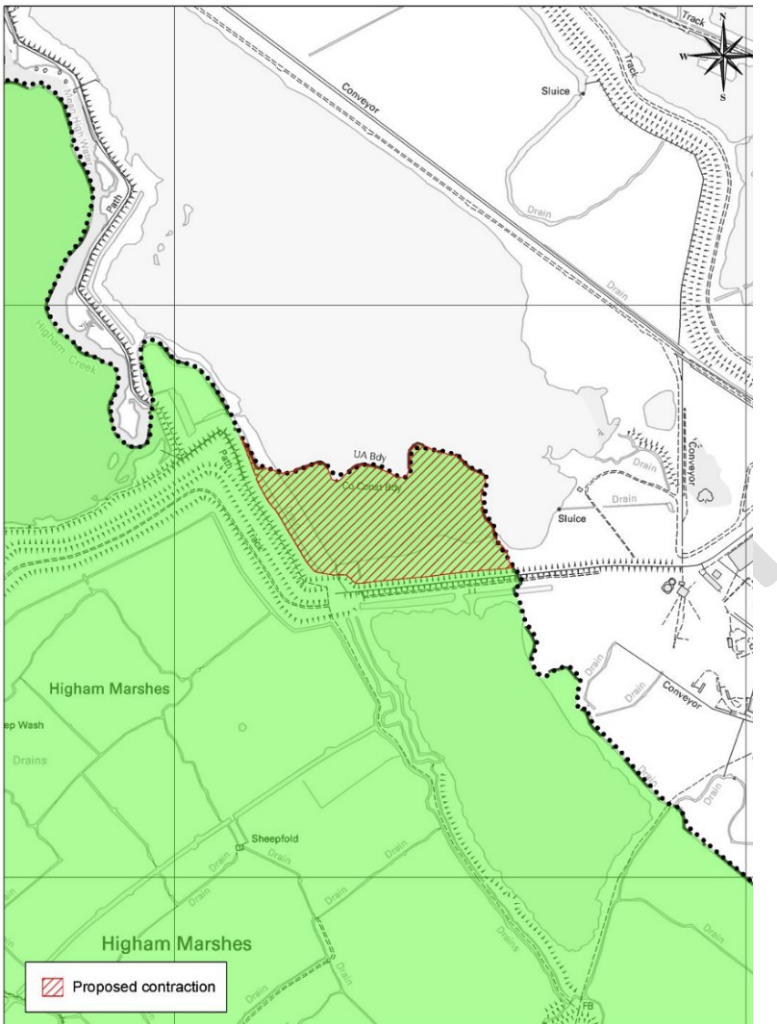


Fig 10 Land at Higham Creek. The district boundary currently extends into the waterbody at Alpha Lake. This edge is not clearly defined by physical features. Recommendation: Minor contraction to green belt boundary to follow edge of water body.

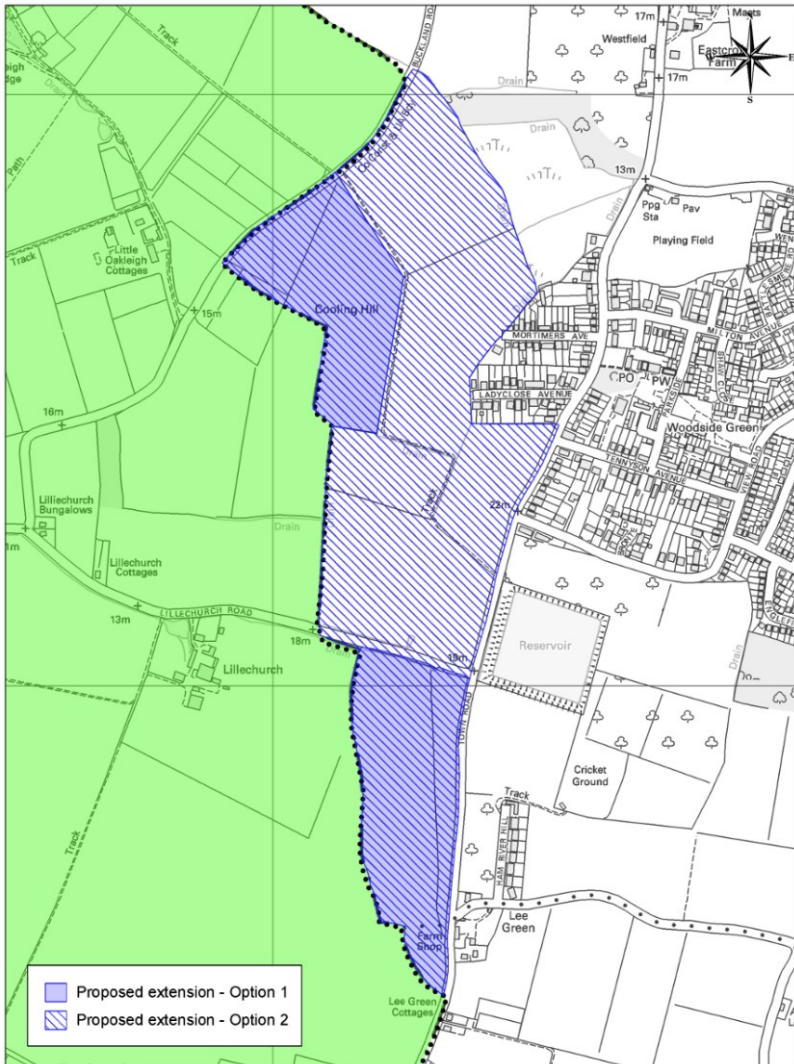


Fig 11 Land to west of Cliffe Woods. The district boundary offers poor physical definition at Cooling Hill and land to south of Littlelechurch Road and west of Town Road. Recommendation: Fig 11 describes two options. Option 1 involves minor adjustments to provide stronger physical edges. Option 2 includes Option 1 but proposes a more significant adjustment, extending the green belt to follow a very strong existing field boundary and then heading south, following the developed edge of Cliffe Woods and strong physical edge of Town Road.

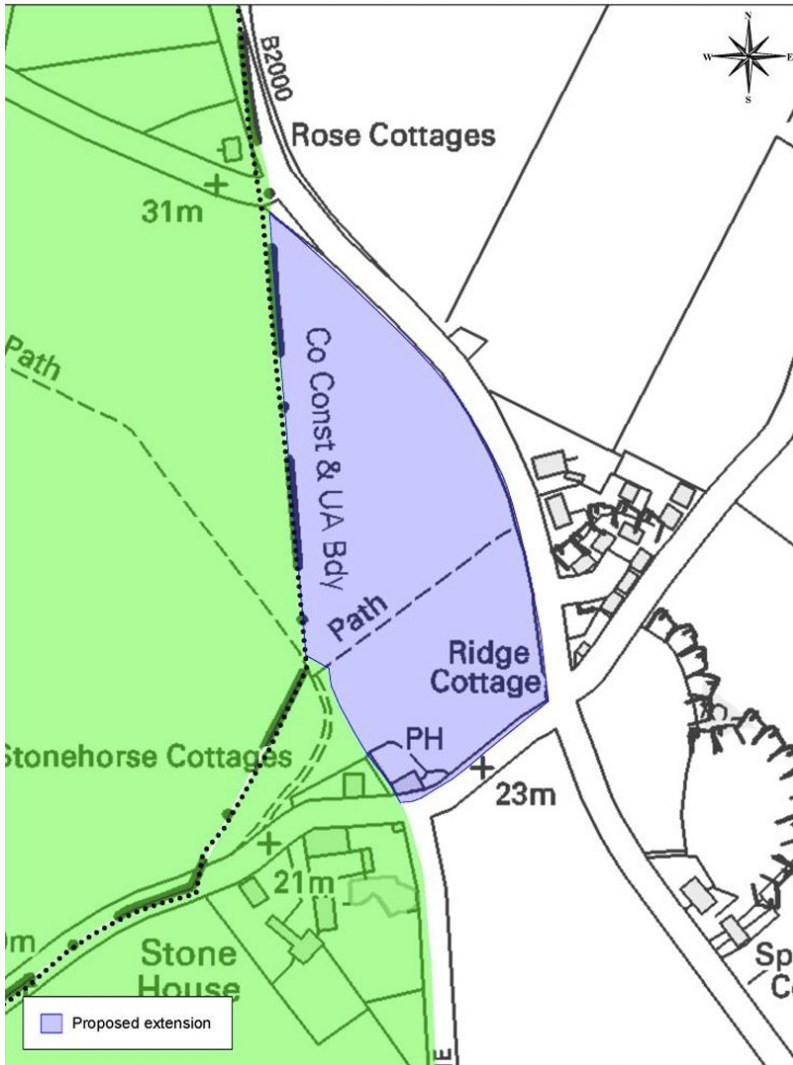


Fig 12 Land to north east of Stone House Farm. The district boundary along this edge does not coincide with any clear physical boundary (ie. it runs across a field). Recommendation: Extend Green Belt to follow Dillywood Lane and B2000

6.2 Parcel 3 – Boundary anomaly

See Section 4.3 for contextual detail relating to this land parcel

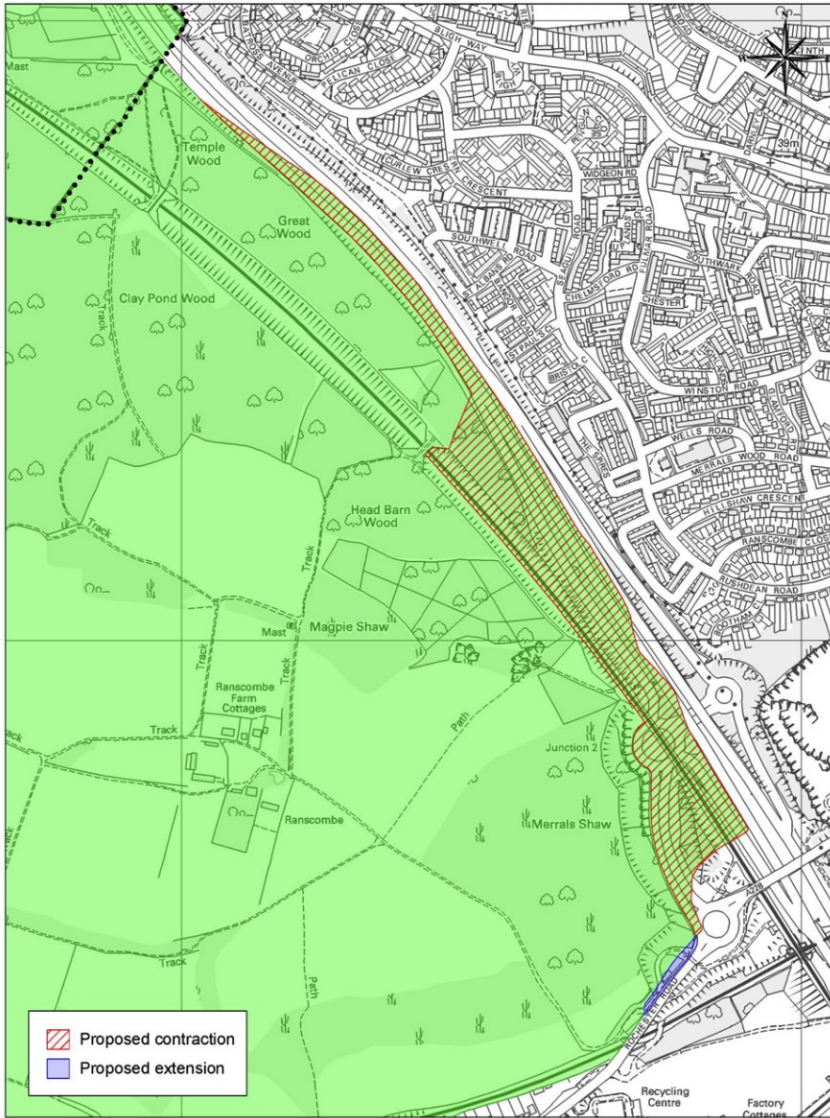


Fig 13 Land to west of M2. There are inconsistencies in the Green belt boundary mapping along the eastern edge of this parcel. The Green Belt overlaps the M2 and some of the slip road. Recommendation: Adjust Green Belt boundary to clearer physical boundaries as indicated on fig 13 proposals.

7 Appendices

Appendix A

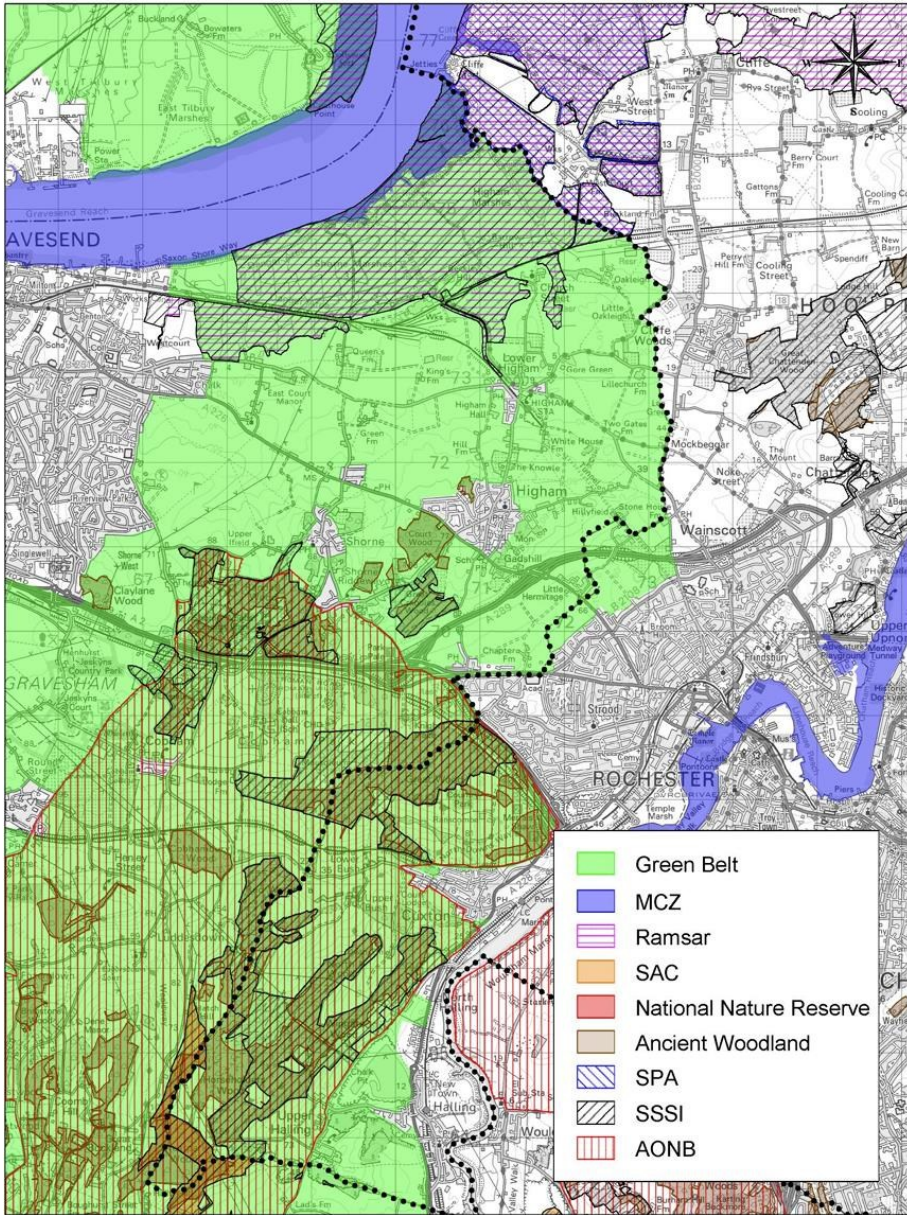
Definitions of terms

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

Commented [SY50]: Suggest this should refer to towns.. and reference Strood.

Appendix B

Environmental Designations



Appendix C

Assessment template

Purpose	Assessment considerations
<p>Purpose A – to check the unrestricted sprawl of large built up areas</p> <p>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.</p>	<p>Strong</p> <p>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.</p> <p>They are also likely to include all of the following features:</p> <ul style="list-style-type: none"> - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt) <p>Moderate</p> <p>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):</p> <ul style="list-style-type: none"> - 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 <p>Weak or None</p> <p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> - 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
<p>Purpose B – to prevent neighbouring towns merging into one another</p> <p>This purpose relates to the merging of towns, not villages.</p>	<p>Strong</p> <p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> - 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 <p>Moderate</p> <p>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):</p> <ul style="list-style-type: none"> - 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

	<p>limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation</p> <p>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</p>
<p>Purpose D – to preserve the setting and special character of historic towns This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.</p>	<p>Strong Assessment areas that contribute strongly are likely to 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</p>
	<p>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): - 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</p>
	<p>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</p>
Consideration of footnote 7	
5 purposes of Green Belt all together including to prevent urban sprawl by keeping land permanently open.	
Result	

Grey Belt	
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Footnote 7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

Paragraph 189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁶⁶. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Commented [RS51]: The NPPF reference here is to para 194 not 189:

"The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites⁷¹; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites"

Habitats sites are defined in the NPPF glossary as:

"Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites."

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Appendix A2

Draft Green Belt Review – comments exported (where obscured in Appendix A1)

Page Number	Comment
4	Minor point but Green Belt as a term should always be in up case according to Gov guidance and grey belt in lower case
8	This would benefit from a clearer justification on why the parcels boundaries were chosen. It will be important to note that the definition of parcel boundaries was an iterative process – ie that if significant differences in the performance of a parcel...ie within a parcel were identified, then the parcel was sub-divided. One criticism of pre-defining parcels that has been raised at Local Plan Exams is that it can lead to the averaging out of contribution ratings within a parcel which creates misleading results.
10	It would be helpful to note that the assessment seeks to assess the contribution to the GB purposes in line with the illustrative criteria set out in the PPG. This is mentioned below but should be brought up front.
10	Purposes should be referred to as A, B, C, D and E now as per NPPF
10	Would be good to note that the PPG states that 'villages should not be considered large built-up areas' (PPG Paragraph: 005 Reference ID: 64-005-20250225). The implication of this is that towns and cities are large built-up areas. Also note that for the purpose of this assessment Strood is a town and has therefore been treated as a large built area.
10	The NPPG makes it clear that in relation to Purpose B, that villages do not fall under this definition. Would suggest delete the reference to villages here.
10	Again reference to villages could be open to challenge. Referring to preventing the coalescence between Strood and Snodland is valid.
10	It might be helpful to define what you mean by urbanising influence. We define this as: 'Urbanising influence' This is defined as a combination of both the influences of 'existing development' and 'other urbanising influences'. This includes urbanising development washed over by, inset within or directly adjacent to the outer edges of Green Belts, such as villages and hamlets, industrial, educational and/or retail estates. Relevant factors influencing the significance of urbanising influence include separating/screening physical boundary features, the scale/visibility of urbanising development and associated land uses and activity, landform change, distance from the urban areas, and the strength of relationship with the wider countryside.
10	Agree this is an acceptable conclusion re. Purpose D
10	Despite this it may be worth considering whether the historic river valley setting of Strood and Rochester would be affected by development extending west beyond the ridge crest. The PPG talks about "visual, physical, or experiential relationship to historic aspects of the town". It may still have a bearing on views from the historic core, or looking down into it from high ground? This may not be the case - or may only apply to land outside of Medway - but the possibility should be addressed.
10	Cuxton and Halling etc are villages and NPPG makes it clear this purpose only applies to towns.
10	These do however fall under the Footnote 7 designations and should be referenced there.
11	We were advised by barrister that we do need to include rating for purpose E but that it can be a uniform rating. This is the text we typically include in our studies. Happy for you to use this if helpful: Purpose E is not relevant to the identification of grey belt and is not referenced in the PPG, but it is one of the five purposes of Green Belt set out in the NPPF. Most Green Belt studies do not assess individual Green Belt land parcels against Purpose E, and either do not rate them or rate them all equally, on the grounds that outside the definition of PDL, it is difficult to justify why the release and/or development of one area of Green Belt land has a greater impact on encouraging re-use of urban land than another. This is supported by planning inspector's judgements on the matter, such as the inspector's report re: the London Borough of Redbridge's Local Plan (January 2018), which noted that with regards to Purpose E 'this purpose applies to most land' but that 'it does not form a particularly useful means of evaluating sites' More generally regarding plan-making, paragraph 147 of the NPPF states that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development [including] a) makes as much use as possible of suitable brownfield sites and underutilised land and b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport'. In other words, Purpose E must have already been followed before options in the Green Belt are considered further. Using evidence to inform meaningful judgements on the collective contribution Green Belt land makes to Purpose E is also difficult. In the absence of any clear guidance on what percentage of recorded brownfield land enables a Green Belt to play a stronger or more limited role in encouraging urban regeneration, a uniform level of 'moderate' contribution to Purpose E is applied to all areas of Green Belt in the study area.
11	This could benefit from a bit more detail. The Government's definition of grey belt land '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 PPG states in such locations, it may be necessary to only 'provisionally identify such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225). This assessment identifies land which is subject to Footnote 7 designations. For the purposes of this assessment this is taken to include:xxxx
11	Suggest this should be swapped with: The PPG states that this judgement should focus on evaluating the effect of release or development on 'the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'. It is not just about sprawl and openness. In the context of this study would be helpful to explain the assessment is relevant to the Medway Plan area. Also important to note 'Purposes (taken together)' Release or development that fundamentally and meaningfully impacts Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way. You may also want to set out what a fundamental and meaningful impact may be in the context of the Medway GB. You may also want to include a caveat that: Without a clear understanding of the location of release or development, its scale and land use, including what Green Belt land would remain within the plan area, it will not be possible to make a definitive judgement on fundamental impact at this stage.
13	A strong contribution to Purpose A, B or D means that the parcel is not grey belt, so giving ratings of 'strong/moderate' introduces some ambiguity that could cause difficulties when justifying the grey belt judgement. In this particular instance Purpose A = strong so land is not grey belt but for some other parcels the highest rating is strong/moderate. We would advise coming down on one side of the fence or the other.
13	Given that the parcel (along with Parcel 2, assuming that would also be developed) forms such a small part of the gap I think it is hard to argue that it could meet the PPG's criteria for a strong rating. The PPG wording suggests that moderate is appropriate here (especially given the presence of intervening higher, wooded ground).

Page Number	Comment
13	Purpose C assessment seems to be missing. This should be included as otherwise you can't assess fundamental impact on all GB purposes – which includes Purpose C.
14	The PPG indicates that footnote 7 areas/assets which don't make a strong contribution to A, B or D should be regarded as provisional grey belt, as the judgement as to whether development would be contrary to relevant policies may depend on the type of development proposed. We would suggest mapping footnote 7 areas rather than making any judgement on their applicability at this stage, although it's fine to mention them here. This is what we have been advised by a barrister to do.
14	Although the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, the PPG requires consideration as to whether proposals would “fundamentally undermine the five Green Belt purposes (taken together) of remaining Green Belt in the plan area”. This is difficult to judge without having specific proposals to consider, and the effects could be cumulative relating to a set of proposed allocations, but we have been advised by a KC that a strategic assessment should nonetheless comment on any potential for development to fundamentally undermine the purposes. Could the judgement be rephrased to consider whether development in this parcel would be significant enough to fundamentally undermine the purposes across the plan area? Loss of any Green Belt land would be contrary to the aim of keeping land permanently open, but it would have to be a substantial impact to mean the 'fundamentally undermine' test - although our interpretation is that this doesn't mean that a parcel has to strongly contribute to all of the purposes.
16	Not relevant to GB assessment. Best to delete so people don't challenge why it has been included.
16	If the implication is that this area makes a weaker contribution, should consider whether this ought to be a separate parcel. A common challenge from developers is that the ratings would've been different if a smaller parcel had been defined.
16	Isn't Parcel 2 all to the south of the A289?
16	This isn't relevant to Green Belt contribution.
17	We would suggest that the assessment is focused on land within Medway, although it is important that impact on land in Gravesham is taken into account and to do that there does need to be consideration of whether adjacent land in Gravesham makes a stronger contribution, and whether that would be weakened by development of land in Medway.
17	I agree that development of adjacent land in Gravesham would weaken this parcel's contribution, but is this study required to assess the impact of development in another local authority area? In effect that means you are assessing land in Gravesham, which would be something Gravesham should be considering in their GB study? If part of the methodology is to consider the impact that development in Gravesham would have on land in Medway then it should be stated in the method section and for consistency it should be applied to all parcels bordering land in Gravesham?
17	The contribution of this parcel should be assessed in isolation (although for Parcel 1 it is reasonable to assume that its development would be part of an expansion of Strood that would include intervening land in Parcel 2).
18	This contradicts the moderate ratings assigned to Purposes A and B.
18	Whilst this might all be true the focus should in the first instance be on impact of release of land in Medway. The conclusion might be that Parcel 2 does not have a strong boundary to restrict and contain development, so its release would in turn weaken the contribution of land in Gravesham, but also that the area as a whole is subject to urbanising influence and is contained by a strong boundary feature (i.e. A289). So in effect you are assessing the land in Gravesham as well but without parcelling and rating it.
18	It 'isolation' is referring to just Parcel 2 it seems strange that it would rate stronger than the GBC part, especially when Purpose A and B are both rated moderate. We would suggest not rating the GBC bit anyway and, as noted above, we would suggest avoiding using moderate/strong (or strong/moderate) as a rating.
21	Parcel 3 should be assessed in isolation. Although it is contained by the railway our interpretation of the PPG is that the fact that development here would breach a strong boundary (the M2) would make it incongruous with the urban pattern. The current settlement edge is restricted and contained by the M2, so development crossing this would breach that containment.
21	Parcel 3 in isolation is a very small part of the gap and visually contained, so should rate weak in line with PPG.
21	Should specify the other town - presumably Snodland?
21	This isn't relevant to Purpose 2 specifically - if this land was identified as not making a strong contribution to A, B or D it would mean that it would be provisional grey belt - subject to consideration as to whether development would harm the special qualities of the National Landscape.
22	Would recommend not doing this cumulative assessment here - see comments under Parcels 4 and 5.
22	Should present some criteria in the methodology for assessing Purpose C.
22	I think it's enough to say that it's not grey belt because of strong contribution to Purpose A - breaching a strong and consistent urban edge boundary (the M2).
25	There's a lot of info here which, whilst relevant to the broader consideration of sustainability and impact of development, isn't relevant to Green Belt contribution.
25	This is quite complicated. Development needs to be considered in the context of expansion of Strood (where it would be significant sprawl, extending beyond the M2 and the railway line) but also expansion of Cuxton (where it would also be crossing a strong and consistent boundary feature: another railway line). We would usually recommend defining separate parcels adjacent to each inset settlement, to assess contribution in the context of their expansion, but in this case the homogeneous character of the parcel and the similarity in terms of contribution means that, in my opinion, it would rate strong for Purpose A in relation to both settlements. I don't think the wider function with parcel 5 needs to be considered here.
25	We could consider it in isolation (as an expansion of Cuxton) or in combination with release of Parcel 3 as an expansion of Strood. Either way it is a small part of the gap so I don't think it can rate more than moderate, and shouldn't consider it an association with parcel 5.
28	This large parcel doesn't distinguish variations in contribution in relation to the different settlements it adjoins. There are potentially locations where smaller releases of land would only affect land that is already subject to urbanising influence - e.g. at North Halling north of the recent development north of St Andrews Lakes?

Page Number	Comment
28	To rate all of this parcel strong you would need to demonstrate firstly that Purpose A is relevant - i.e. that all the land here is 'close to' a large built-up area - and secondly that there aren't any locations where expansion would not meet the requirements of a strong contribution. Otherwise you will be open to the challenge that if you had defined smaller parcels in some locations your findings would have been different.
28	Strood is the only settlement defined as a large built-up area so for Purpose A to be relevant you will need to justify that expansion of Halling, North Halling or Cuxton would be associated with the sprawl of Strood. If Snodland is defined as a town, however, you could also consider this a large built-up area (noting that the PPG just says that 'villages should not be considered large built-up areas'), strengthening the case for saying that expansion of settlements in this chain along the A228 is associated with a large built-up area.
29	In reality any proposals for development are likely to be for a small proportion of land in this parcel, not for release of all of it. If you define smaller parcels adjacent to the inset settlements it is likely that there will be some locations that do not meet the PPG criteria for a strong contribution to Purpose B.
30	We recommend that smaller parcels are defined adjacent to all inset settlements, and adjacent to North Halling if it is considered too lacking in openness to retain its Green Belt status.
32	Whilst it is reasonable to summarise the role of Green Belt land at a grouped parcel level the assessment should ideally be helpful in identifying grey belt land at a more localised level - e.g. for speculative development proposals.
32	The absence of strong physical features doesn't necessarily mean that there will not be variations at a smaller scale. In our view, parcels should be defined to reflect variations in contribution to the purposes, and these variations may be defined by boundary features that are not 'strong'. A minimum parcel size could be stated - LUC's studies typically define a minimum somewhere between 1 and 10 hectares (although most parcels would be much larger than the minimum).
32	It's not clear what this 'aims' rating is.
32	A conclusion as to whether the parcel is grey belt would be helpful.
38	Suggest this should refer to towns.. and reference Strood.
42	The NPPF reference here is to para 194 not 189: "The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites ⁷¹ ; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites" Habitats sites are defined in the NPPF glossary as: "Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites."

Appendix B

List of all documents that will be subject to consultation

EXAMINATION LIBRARY CATEGORY	REFERENCE	DOCUMENT TITLE	DATE OF DOCUMENT	AVAILABLE AT REGULATION 19 - MEDWAY COUNCIL	MEDWAY COUNCIL'S NOTES
A. CORE SUBMISSION DOCUMENTS	A4.1	A4.1 Submission Habitats Regulations Assessment		No	Interim Habitats Regulations Assessment (June 2025) was available at Regulation 19.
A. CORE SUBMISSION DOCUMENTS	A4.2	A4.2 Submission Habitats Regulations Assessment - Air Quality Modelling for Ecology Assessment		No	
A. CORE SUBMISSION DOCUMENTS	A4.3	A4.3 Submission Habitats Regulations Assessment - Interpretation of Air Quality Modelling Data		No	
A. CORE SUBMISSION DOCUMENTS	A14	A14 Monitoring Framework		No	
B. EVIDENCE BASE	B2	B2 Infrastructure Delivery Plan (December 2025)	December 2025	No	Infrastructure Delivery Plan (June 2025) was available at Regulation 19.
B. EVIDENCE BASE	B4	B4 Developer Contributions and Obligations Guide (December 2025)	December 2025	No	Previous iteration of Developer Contributions and Obligations Guide was available at Regulation 19. An updated document was subject to consultation during 23 March to 5 May 2026.
B. EVIDENCE BASE	B6.1	B6.1 Strategic Flood Risk Assessment - Level 1 (November 2025)	November 2025	No	Strategic Flood Risk Assessment - Level 1 (May 2025) was available at Regulation 19.
B. EVIDENCE BASE	B6.2	B6.2 Strategic Flood Risk Assessment - Level 1 (November 2025) - Appendices	9 October 2025	No	
B. EVIDENCE BASE	B6.3	B6.3 Strategic Flood Risk Assessment - Level 2 (November 2025)	November 2025	No	Strategic Flood Risk Assessment - Level 2 (May 2025) was available at Regulation 19.
B. EVIDENCE BASE	B6.4	B6.4 Strategic Flood Risk Assessment - Level 2 (November 2025) - Appendices	18 June 2025	No	
B. EVIDENCE BASE	B6.5	B6.5 Strategic Flood Risk Assessment - Sequential Test Report	November 2025	No	Strategic Flood Risk Assessment - Sequential Test Report (May 2025) was available at Regulation 19.
B. EVIDENCE BASE	B18.1	B18.1 Strategic Transport Assessment - Forecasting Report	15 December 2025	No	Previous iteration of Forecasting Report was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.4	B18.4 Strategic Transport Assessment - Merge and Diverge Assessment	16 December 2025	No	Previous iteration of Merge and Diverge Assessment was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.5	B18.5 Strategic Transport Assessment - M2 Junction Analysis Technical Note	15 December 2025	No	Previous iteration of M2 Junction Analysis Technical Note was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.6	B18.6 Strategic Transport Assessment - Proportionality Assessment	15 December 2025	No	Previous iteration of Proportionality Assessment was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.7	B18.7 Strategic Transport Assessment - Junction Modelling and Mitigation Report	15 December 2025	No	Previous iteration of Junction Modelling and Mitigation Report was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.8.1	B18.8.1 Strategic Transport Assessment - M2 Junction 1 Design Review	Winter 2025	No	
B. EVIDENCE BASE	B18.8.2	B18.8.2 Strategic Transport Assessment - M2 Junction 1 Safety Review	21 October 2025	No	
B. EVIDENCE BASE	B18.8.3	B18.8.3 Strategic Transport Assessment - M2 Junction 1 Cost Estimate Report	30 October 2025	No	
B. EVIDENCE BASE	B18.9	B18.9 Strategic Transport Assessment - M2 Junction 4 Cost Estimate Report	10 November 2025	No	
B. EVIDENCE BASE	B20	B20 Local Aggregates Assessment	December 2025	No	Published annually.
B. EVIDENCE BASE	B22.1	B22.1 Site Selection Topic Paper	December 2025	No	
B. EVIDENCE BASE	B22.2	B22.2 Hoo Peninsula Strategic Environmental Programme Topic Paper	December 2025	No	
B. EVIDENCE BASE	B22.3	B22.3 Site-Specific Flood Risk Topic Paper	December 2025	No	
B. EVIDENCE BASE	B22.4	B22.4 Green Belt Exceptional Circumstances Topic Paper	December 2025	No	
B. EVIDENCE BASE	B22.5	B22.5 Housing Delivery Topic Paper	December 2025	No	
B. EVIDENCE BASE	B22.6	B22.6 Self-build and Custom Housebuilding Topic Paper	December 2025	No	Previous iteration of Self-build and Custom Housebuilding Topic Paper was available at Regulation 19.
B. EVIDENCE BASE	B22.7	B22.7 Gypsy and Traveller Accommodation Topic Paper	December 2025	No	
B. EVIDENCE BASE	B22.8	B22.8 Main Town Centre Uses Topic Paper	December 2025	No	
B. EVIDENCE BASE	B22.9	B22.9 Vehicle Trip Budget Topic Paper	December 2025	No	
B. EVIDENCE BASE	B22.10	B22.10 Health and Wellbeing Topic Paper	December 2025	No	Previous iteration of Health and Wellbeing Topic Paper was available at Regulation 19.
NEW DOCUMENT	n/a	Review of updated SFRA data and implications for the Regulation 19 Sustainability Appraisal	June 2026	No	
NEW DOCUMENT	n/a	Playing Pitch Strategy	June 2026	No	
NEW DOCUMENT	n/a	Built Facilities Strategy	June 2026	No	
NEW DOCUMENT	n/a	Facilities Planning Model	June 2026	No	