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8 May 2026

Dear Mr McCormack and Mr Hendley

**MEDWAY COUNCIL'S RESPONSE TO THE INSPECTORS' INITIAL QUERIES LETTER  
(MLP/ED5) – GREEN BELT NOTE**

Thank you for your letter dated 27 March 2026 (ref: MLP/ED5).

Further to my letter dated 29 April 2026 (ref: MLP/ED6), please find attached Green Belt Note for your consideration.

A Gypsy, Traveller & Travelling Showpeople Note will be provided by the end of 15 May 2026.

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 style and is set against a light blue rectangular background.

Dave Harris  
Chief Planning Officer

# GREEN BELT NOTE

## MEDWAY COUNCIL'S RESPONSE TO THE INSPECTORS' INITIAL QUERIES LETTER (MLP/ED5)

**Paragraph 20. The Plan proposes the release of Green Belt land, relating to an area of land to the west of Strood, following an assessment that areas of grey belt exist which provide exceptional circumstances to justify the release. Other more minor alterations to the Green Belt are also proposed. We have a number of initial queries, as set out below, where we are seeking a response from the Council at this stage through a Green Belt Note.**

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This note is prepared to respond to the Inspectors queries set out in paragraphs 20 to 24. Paragraph 20 sets out the format the response is required in. The structure below sets out the queries as per the Inspectors' letter from paragraphs 21 through to 24.

**Paragraph 21. It is understood that the Green Belt Review was made in 2025, when the Plan reached the Regulation 19 stage. The Council is therefore requested to clarify what consultation was carried out on the proposed Green Belt release prior to the submission of the Plan for examination and what documents were made available for consultation. This should include clarification of what constitutes the Council's in house Green Belt Review and, separately, the critique by independent consultants. Please also confirm whether the Policies Maps accurately show the intended extent of all the changes to the Green Belt.**

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### Consultation

'Green Belt Review' (ref: B8) is the Council's in-house Green Belt Review prepared in 2025.

The proposed release of Green Belt was consulted upon at the Regulation 19 stage, supported by the Council's Green Belt Review (ref: B8), which reflects the 2024 National Planning Policy Framework (NPPF) and guidance released<sup>1</sup> in 2025 on the identification of grey belt land including additional criteria and methodology.

The documents made available at Regulation 19 were the Council's Green Belt Review (ref: B8) and the pre-submission Regulation 19 Local Plan.

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<sup>1</sup> NPPF December 2024 and PPG February 2025

### External critique of Medway's Green Belt Review

An independent critique of the draft of Medway's Green Belt Review 2025 (ref: B8) was undertaken by consultants on the 6<sup>th</sup> of June 2025 and provided as comments in tracking. This was done to assist the Council given consultants limited availability and the timing of the programme for the preparation of Medway's Local Plan reaching publication by summer 2025. For transparency, the draft with tracking can be made available if required.

### Policies Map

The Policies Map does accurately show the intended extent of all the changes to the Green Belt that support Medway's Local Plan strategy, i.e. land at the West of Strood is necessary through exceptional circumstances as a cross border strategic allocation to meet Medway's identified requirements for sustainable development<sup>2</sup>. The 'Green Belt Exceptional Circumstances Topic Paper (ref: B22.4) would require some amendments at Table 1 for consistency, which the Council suggests could be supplemented with the updates, for example by way of addendum.

See answer to latter part of paragraph 22 below for further clarification on boundary changes and suggested amendments required and to the Green Belt Exceptional Circumstances Topic Paper (ref: B22.4).

**Paragraph 22. We also understand that the review was undertaken with regard to national policy and we would find it useful for it to be set out how the NPPF and the Planning Practice Guidance: Green Belt were applied to the methodology that is engaged in the Green Belt Review (ref: B8). While it is highly likely that we will have questions on the methodology used throughout the examination, clarification should also be provided at this stage on how parcels were derived (and in some instances amalgamated), the application of the Green Belt purposes, why land has been released in part of the other parcels (other than land to the west of Strood) and why not all aspects of the Green Belt Review were taken forward.**

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### Application of National Policy Planning Framework and Planning Practice Guidance

New guidance on the Green Belt Review including grey belt considerations was introduced through the NPPF in December 2024, followed by detailed guidance in the Planning Practice Guidance (PPG) in late February 2025. Medway's Regulation 19 consultation on the pre-submission Local Plan was informed by the Green Belt Review (ref: B8), undertaken in-house after changes to the NPPF and PPG guidance<sup>3</sup>. Regard was had to these changes to the NPPF and PPG in the production of the Green Belt Review (ref: B8).

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<sup>2</sup> NPPF paragraph 146, 147, 148 and 149

<sup>3</sup> NPPF December 2024 and PPG February 2025

The methodology of how the NPPF and PPG have been applied in the Green Belt Review (ref: B8) is set out below:

### ***Step 1: Initiated Green Belt Review***

The main change applied through the December 2024 NPPF is the identification of grey belt land as set out in paragraph 148. It includes grey belt land as a consideration in the preparation of Local Plans where the release of Green Belt may be required. A better understanding of grey belt was required and as such the Council's Green Belt Review was initiated.

### ***Step 2: Considered NPPF***

The NPPF glossary provides a definition of grey belt land as land in the Green Belt comprising previously developed land and/or any other land, that in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 (NPPF). 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. Paragraph 001 of the February 2025 PPG references back to paragraphs 147 and 148 of the NPPF when setting out more detailed guidance. This clarified the process and requirements needed to demonstrate exceptional circumstances, the prioritisation of land in a specific sequence and the importance of sustainable patterns of growth, which would be used to inform the Council's Local Plan strategy. The definition also provided clarity on how Green Belt land should be assessed against the Green Belt purposes including the consideration of previously developed land and land covered by footnoted 7 and therefore confirmed the need to review of the Council's 2018 Green Belt Review. This step was undertaken to understand the requirements of the NPPF and PPG, which informed steps 3 to 6 below.

### ***Step 3: Consider the PPG and update the methodology***

Paragraph 002 of the PPG confirms that to identify grey belt land, authorities should produce a Green Belt assessment. Paragraph 003 of the PPG indicates the step-by-step process for undertaking a Green Belt review with due consideration of grey belt land, previously developed land, footnote 7 and the exclusion of villages when considering coalescence and impact. This differs from the previous methodology applied to the 2018 Medway Green Belt Review. It was determined that a refresh of the 2018 Medway Green Belt Review was required to reflect this new methodology and to determine if land should be defined as grey belt.

The revised methodology in the Green Belt Review (ref: B8), mirrored the sequencing set out at paragraph 003 of the PPG, i.e. identification of assessment areas (ref: B8, section 2.6), evaluate each parcel against Green Belt purposes (a), (b) and (d) followed by the consideration of footnote 7, identification of grey belt and final assessment against all purpose of the Green Belt taken together (ref: B8, section 3).

**Step 4: Parcel identification**

The first bullet of paragraph 003 and the entirety of paragraph 004 of the PPG provide guidance on the identification of assessment areas. Paragraph 004 of the PPG was applied to the Green Belt Review (ref: B8) at section 2.6.

The assessment areas in figure 4 (page 11) of the Green Belt Review (ref: B8) are consistent with bullets 3 and 4 of paragraph 004 of the PPG. The figure shows the majority of small assessment areas around existing settlements and transport corridors and two larger assessment areas reflecting their local landscape characteristics and appropriateness. This is explained further below.

**Step 5: Consideration of criteria for assessment**

Paragraph 005 of the PPG and paragraph 143 of the NPPF was applied in the Green Belt Review (ref: B8) at section 2.7. This includes the assessment of parcels against Green Belt purposes (a), (b), (d) as well as purposes (c) and (e).

Clarification is provided at section 2.7 (ref: B8) on what settlements would be considered relevant, which excluded villages. Further commentary explores the relationships with neighbouring authorities' settlements and the prevention of coalescence.

**Step 6: Assessment**

Section 2.8 of the Green Belt Review (ref: B8) describes how the appraisal criteria would be applied in the assessment work at section 3, including the application of footnote 7 of the NPPF and consideration of all the Green Belt purposes (taken together). Consideration of footnote 7 was applied following the assessment of the contribution to the purposes of the Green Belt. This section of the Green Belt Review (ref: B8) also points to an assessment table at Appendix C, which brings together all the assessment criteria set out at steps 5 and 6. This assessment table was used to present the assessment findings for each parcel at section 3 (ref: B8).

**How the parcels were derived**

All the Green Belt land in Medway was firstly identified as per bullet one, paragraph 004 of the PPG, captured at figure 4 in the Green Belt Review (ref: B8) and within context of the wider Green Belt in figures 1, 2 and 3.

Taking on board the need to ensure parcels are assessed appropriately of their contribution to Green Belt purposes, Medway Green Belt land was broken up to a sufficiently granular level<sup>4</sup>. The Council used the 2018 Green Belt Review as a starting point in the identification of appropriate parcels. These parcels were reconsidered against requirements in the new PPG.

No parcels set out in the 2018 Green Belt Review were amalgamated. The 2018 Green Belt Review identified five parcels and these were disaggregated into the

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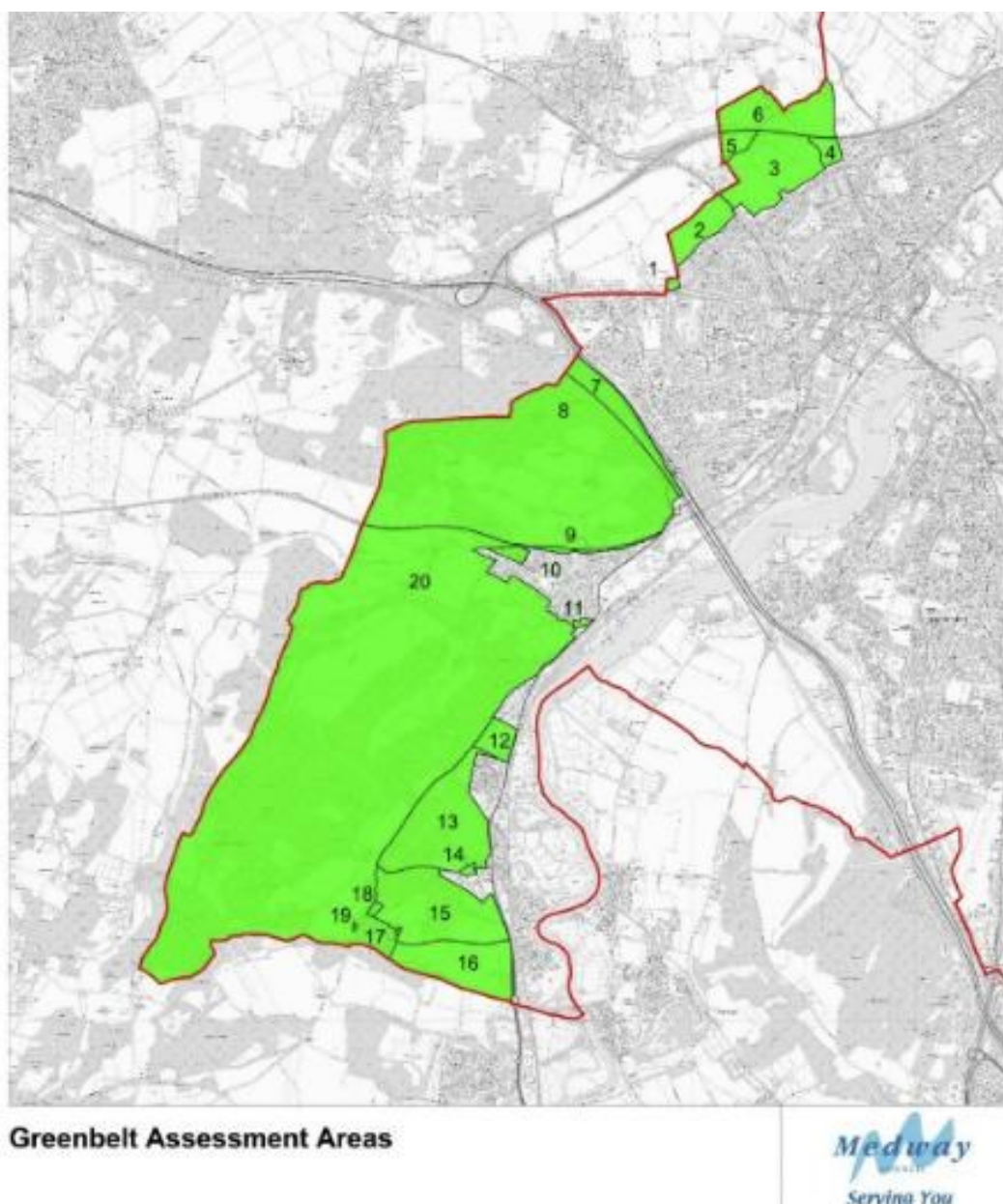
<sup>4</sup> PPG paragraph 004, bullets 2, 3 and 4

twenty parcels in the Green Belt Review (ref: B8), thereby showing consistency with the PPG at bullets 3 and 4 of paragraph 004, providing for more specific detail in the assessment of grey belt.

The disaggregation of parcels was informed by:

- Land being of similar use or landscape characteristics, where relevant. This would allow for the parcel as a whole to be assessed without significant differences in performing functions of the Green Belt.
- Where possible, clearly defined boundaries (topography, vegetation, or man-made roads, etc.) were used to further disaggregate parcels.

Figure 4 in the Green Belt Review (ref: B8) shows a disaggregation to twenty parcels.



**Figure 1: Map of assessment areas (ref: B8)**

All parcels, excluding parcels 20 and 8, are smaller due to their use, character, being close to urbanising influences, and the presence of boundaries that enabled further parcel definition.

Parcels 8 and 20 sit away from urbanising influences and have a strong rural character. Parcel 20 is characteristic of a linear area that extends to the administrative boundaries of T&MBC to the south and Gravesham to the west. Characterised by a steeply sloping scarp edge, it provides a consistent landscape of chalk exposures forming dramatic cliff sides. It contains extensive dense deciduous woodland cover on the scarp slopes, protected landscapes with the lower lying slopes supporting a belt of open arable farmland. This exhibits special coherent characteristics and topographical features that should be read across together in informing Green Belt purposes.

Parcel 8 is an area of undulating chalk downland, dry valleys and woodland cover that sits with the Kent Downs National Landscape. It is managed as a wildflower meadow and features extremely unusual collection of rare wild plants. It also contains dense woodland with a pattern of Ancient Woodlands and open farmland that has remained largely unchanged since the late nineteenth century. Parcels 8 and 20 are separated by a man-made railway line boundary.

#### Application of Green Belt purposes

The template for assessing each parcel of land in Appendix C of the Green Belt Review (ref: B8) includes the assessment against all five Green Belt purposes (a. to e.) individually as well as the consideration against all five purposes of the Green Belt taken together

#### Recommendations from Medway's Green Belt Review 2025 (ref: B8)

Medway's Green Belt Review (ref: B8) has identified a total of eight parcels as grey belt (Appendix 1). Further decision-making considered the prioritisation of land set out at paragraph 148 of the NPPF. No Green Belt land is identified or proposed for release. With the identification of grey belt parcels through the Green Belt Review (ref: B8), the Council identified the most suitable grey belt land for release where it would meet the needs<sup>5</sup> of the Local Plan, align with its aims and objectives and promote sustainable patterns of growth<sup>6</sup>.

Additional points for consideration in decision-making included the following:

- For Gravesham Borough Council (GBC), there has been a longstanding commitment (Appendix 2). to review their Green Belt, given the limited availability of land within the urban area (Gravesend and Northfleet) and viability constraints. Given limited opportunities to expand the Gravesend urban area due to the impact of Lower Thames Crossing, development

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<sup>5</sup> NPPF paragraph 147

<sup>6</sup> NPPF paragraphs 110 and 115

focused on Chapter Farm (Gravesham's part of the cross boundary site allocation) presents the most sustainable option to meet Gravesham's development needs within their emerging Local Plan strategy.

- The Transport Assessment for the Lower Thames Crossing <sup>7</sup>also identified potential impacts on the road network in the Medway Valley that could arise from the Lower Thames Crossing, i.e. air and noise pollution as well as significant traffic congestion. Therefore, this was one reason why growth in the Medway Valley needed to be limited.

Given the promotion of Gravesham Green Belt land at Chapter Farm, the combination with parcels 1, 2, 3 and 4 offered a robust sustainable option, which brought with it the opportunity to deliver a sustainable community with appropriate infrastructure and sustainable travel options. This was considered the most suitable grey belt option, in preference to other grey belt parcels identified, to consider further through the site selection and sustainability appraisal processes.

Medway's Sustainability Appraisal (ref: A3.2)<sup>8</sup> explains, in the context of parcels 2, 3 and 4, the site selection process from the Regulation 18 stage through to the final site chosen as part of Medway's Local Plan strategy. The introduction of 'grey belt' in conjunction with discussion with GBC brought these parcels into consideration and they performed better than other sites.

Additionally, Medway's Sustainability Appraisal (ref: A3.3)<sup>9</sup> at K.2.6.7 factors in the Green Belt Review and its findings to confirm no significant harm to the Green Belt purposes if these parcels were released as part of the cross border site allocation.

The intended changes confirm parcels 1, 2, 3 and 4 for removal from the Green Belt. These parcels form Medway's part of the cross border site allocation as set out in policy SA6 of the submitted Local Plan.

Therefore, to reflect Medway's Local Plan strategy accurately<sup>10</sup>, it is necessary that the Green Belt boundary is amended in the Policies Map to show the removal of this site allocation from the Green Belt.

Parcels making up site allocation SA6 (parcels 1, 2, 3 and 4) are most suitable and preferable in comparison to parcels 9, 12, 13 and 17 (Appendix 1). Parcels 9, 12, 13 and 17, whilst identified as grey belt land in the Medway's Green Belt Review (ref: B8) are therefore, not required for release from the Green Belt to support Medway's Local Plan strategy. To ensure consistency of the approach, changes to table 1 (page 7) of the Green Belt Exceptional Circumstances Topic Paper (ref: B22.4) are proposed to reflect Appendix 1, which officers recommend could be supplemented by way of an addendum.

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<sup>7</sup> Available at: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/TR010032/documents> (Last accessed 8 May 2026)

<sup>8</sup> Medway's Sustainability Appraisal, ref: A3.2, page 42 of pdf, 'Comment from Council' beneath paragraph 5.5.5)

<sup>9</sup> Medway's Sustainability Appraisal, Volume 3, ref: A3.3, page 600 in the pdf

<sup>10</sup> NPPF paragraph 149

**Paragraph 23. A further aspect of the proposed release of Green Belt land is how it relates to the release of such land in adjoining Gravesham Borough Council (Gravesham). Please clarify whether the reviews are co-ordinated and the nature of the discussions with Gravesham, including working groups, meetings, minutes, Council resolutions, or similar. Please also clarify if a co-ordinated approach to methodology has taken place and if consideration has been given to whether there would be exceptional circumstances to justify the release of land to the west of Strood, were the release of Green Belt land in the adjoining part of Gravesham not to occur.**

Co-ordination and nature of discussions with Gravesham BC on the Green Belt Reviews

Green Belt Reviews for both authorities was not coordinated, such as through a shared commission.

The two councils worked together to secure MHCLG Green Belt Review funding, Medway and Gravesham officers discussed using a shared methodology (Appendix 4) when approaching Green Belt Review consultants together. The aim of the shared methodology was to understand the potential implications and harm to the wider Green Belt of amending the Green Belt boundary to release land for development in either authority and to identify grey belt land. However, the shared methodology was not carried forward into a commission for the reasons set out below.

There was a high level of demand for suitable consultants to conduct Green Belt reviews following the December 2024 NPPF and the updated guidance. The availability of consultants was severely constrained. Medway Council (MC) required a focused piece of work in comparison to GBC, given the smaller extent of Green Belt coverage in Medway. Medway's Local Development Scheme set summer 2025 for the publication of the plan at Regulation 19. It was not possible to meet this timeline if the Council was reliant on the capacity of external consultants, and the decision was taken to progress the required work in house, conducted by Planning and Landscape officers. This necessitated the review being taken forward independently of GBC's review, albeit with an understanding of the need to maintain engagement and to collaborate on this matter. Discussions continued as part of the masterplan process and wider discussions related to the cross border allocation.

Discussions at Duty to Cooperate meetings held on the 22<sup>nd</sup> of April and 19<sup>th</sup> September 2024 (Appendix 3) with GBC officers confirmed their intention to promote Chapter Farm as a site allocation in their Local Plan strategy.

The implications for the Medway Green Belt land arising from the proposed development at Chapter Farm in Gravesham needed to be understood if GBC brought forward their sites in isolation.

### Exceptional circumstances

The Council does not believe that there would be exceptional circumstances to justify the release of land to the west of Strood if the release of Green Belt land in the adjoining part of Gravesham did not happen. If Gravesham did not release their Green Belt land, Medway's Green Belt would be performing its function as part of the larger Green Belt. Even though land forming site allocation SA6 is identified as grey belt land following the introduction of the new grey belt guidance since December 2024, the impact on the wider performance of Green Belt in this location could be undermined and thereby impact on Gravesham's Green Belt land being able to perform its functions effectively. This would be the overriding consideration not to release land west of Strood in these circumstances.

Given the location of the Green Belt parcels, bound by the A289, M2 and the edge of Strood, this linear band of Green Belt is required as a whole, across to Medway and Gravesham administrative boundaries to perform its functions to the west of Strood. There is an interrelationship with the Green Belt in Gravesham to robustly perform the required Green Belt functions and vice versa.

The impacts on Medway's remaining Green Belt resulting from Gravesham Green Belt land being promoted for development in their emerging Local Plan required investigation to assist in decision-making. Initial assessment identified significant impacts on the residual land between the administrative boundary and the eastern boundary of the Green Belt on the periphery of Strood. This narrow area of land would not be able to make a strong contribution to the purposes of the Green Belt. At one point the depth of the residual Green Belt would be 227 metres. Gravesham's Green Belt release covers approximately 103ha, making up 84% of the Green Belt to the west of Gravesend Road, i.e. Medway's remaining Green Belt to the west of Gravesend Road would only be 16%. Development on Gravesham Green Belt land would therefore compromise the ability of Medway's remaining Green Belt to perform its functions effectively<sup>11</sup> The implications of this required further investigation, consideration, and decision-making.

Gravesham confirmed (Appendix 2) that Chapter Farm is needed to meet their housing need following exploration of unmet housing need requests and exhausting searches in the urban areas. The benefits of collaboratively bringing forward a sustainable community compared to retaining what would be a poorly performing Medway Green Belt was more beneficial in the long term. The cross border option with Gravesham's land was therefore taken forward for consideration through the Sustainability Appraisal and site selection processes for the Medway Local Plan. In doing so, NPPF paragraphs 145, 146, 147 and 148 were taken into account.

Medway's Sustainability Appraisal (ref: A3.2)<sup>12</sup> explains, in the context of parcels 2, 3 and 4, the site selection process from the Regulation 18 stage through to the final sites chosen as part of Medway's Local Plan strategy. The introduction of 'grey belt'

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<sup>11</sup> Medway's Green Belt Review (ref: B8), section 2.3 and Medway's Submission Local Plan (ref: A.1), paragraph 14.7.1

<sup>12</sup> Medway's Sustainability Appraisal (ref: A3.2), page 42 of pdf, 'Comment from Council' beneath paragraph 5.5.5

in conjunction with discussion with GBC brought these parcels into consideration and they performed better than other sites<sup>13</sup>.

Additionally, Medway's SA<sup>14</sup> at K.2.6.7 factors in the Green Belt Review and its findings to confirm no significant harm to the Green Belt purposes if these parcels were released as part of the cross border site allocation.

Overall, the cross boundary site allocation performs better sustainably compared to other sites, informed by the sequential approach and sustainability criteria set out in the NPPF<sup>15</sup>. It has direct access onto the A226 (Gravesend Road), which connects to the M2 and A2 and is a key bus route corridor linking to services in the centre of Strood and rail stations. The site allocation is therefore well served by road infrastructure and has the ability to introduce rapid bus transit as well as other sustainable travel options.

The cross border site allocation promotes a sustainable pattern of development<sup>16</sup> and would bring with it the required infrastructure to support a sustainable community. It also aligns better with the Local Plan vision and strategic objectives in creating sustainable communities and sustainable patterns of growth.

**Paragraph 24. Please also provide an update of the latest positions with Gravesham's review of the Green Belt and the position with neighbouring Tonbridge and Malling Council, which has also been referred to in the Green Belt Review.**

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Medway's Green Belt Review (ref: B8) confirms at section 1.3 and 2.3 the position with neighbouring authorities as at the June 2025. Updates since then are set out below.

Position on Gravesham Borough Council's review of the Green Belt

Gravesham BC is out to public consultation on their Regulation 19 Local Plan pre-submission draft this month (concluding on the 29<sup>th</sup> of May 2026), confirming inclusion of their part of the cross border site allocation known as Land West of Strood within Medway's Local Plan. The policy mirrors policy SA6 in the Medway Local Plan with minor tweaks agreed between officers at GBC and MC. The evidence base published include stage 1 and stage 2 Green Belt Reviews, a Landscape Sensitivity and Capacity study and the Culverstone Green Belt Review Report and Annex (2024). A draft Green Belt Review 2026 is underway (Appendix 2).

Through the preparation of their Local Plan and consultation at their Regulation 18 stages, GBC has identified locations for growth following principles of sustainability and supported by the evidence listed above.

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<sup>13</sup> NPPF paragraph 147

<sup>14</sup> Medway's Sustainability Appraisal, Volume 3 (ref:A3.3), page 600 in the pdf

<sup>15</sup> NPPF paragraphs 110, 115 and 148

<sup>16</sup> NPPF paragraph 110 and 115

### Tonbridge & Malling Borough Council updates

Tonbridge & Malling Borough Council (T&MBC) commissioned the preparation of a stage 1 and stage 2 Green Belt<sup>17</sup> Review. MC was consulted on the Green Belt Review methodology in July 2025, which was responded to with comment agreeing with their methodology, offering opportunities for a consistent approach on historic towns, identifying where Medway's towns/district centres should be included for consideration and seeking clarification on other aspects of the methodology.

A Regulation 18 consultation on T&MBC's Local Plan was undertaken in November 2025 and concluding in early January 2026. Both Green Belt Review documents were consulted upon during this period. MC did not raise any objections.

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<sup>17</sup> <https://www.tmbc.gov.uk/local-plan/local-plan-evidence-topic-papers>

## Appendix 1

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### Table and maps of grey belt parcels

## 2025 Green Belt Review findings and decision-making

### A.1. Table 1: identification of grey belt

Parcels	Description	Identified as grey belt in document B8	Carried forward for release from Green Belt boundary	Reasons	Policy map changes
1	Rochester Football Club	Yes	Yes	<p>Following the priority set out in paragraph 148 of the NPPF, no Green Belt land is proposed for release. The most suitable grey belt land is released in preference to Green Belt.</p> <p>This grey belt parcel is preferable in meeting needs<sup>1</sup> and promoting sustainable patterns<sup>2</sup> of growth in combination with parcels 2, 3, 4 and Gravesham land. Additional consideration that informed decision making included:</p> <ul style="list-style-type: none"> <li>Gravesham BC require Chapter Farm to meet their housing need.</li> <li>Impact of Lower Thames Crossing required a measured approach of directing a limited quantum of growth in the Medway Valley.</li> </ul> <p>The cross border site allocation provides a robust sustainable location for growth considered through</p>	Removed from Green Belt to represent the Local Plan strategy accurately.

<sup>1</sup> NPPF paragraph 147

<sup>2</sup> NPPF paragraph 110 and 115

				<p>site selection and assessed through the Sustainability Appraisal.</p> <p>Forms part of site allocation in policy SA6.</p>	
2	Land north of Rede Court Road	Yes	Yes	<p>Following the priority set out in paragraph 148 of the NPPF, no Green Belt land is proposed for release. The most suitable grey belt land is released in preference to Green Belt.</p> <p>This grey belt parcel is preferable in meeting needs<sup>3</sup> and promoting sustainable patterns<sup>4</sup> of growth in combination with parcels 2, 3, 4 and Gravesham land. Additional consideration that informed decision making included:</p> <ul style="list-style-type: none"> <li>• Gravesham BC require Chapter Farm to meet their housing need.</li> <li>• Impact of Lower Thames Crossing required a measured approach of directing a limited quantum of growth in the Medway Valley.</li> </ul> <p>The cross border site allocation provides a robust sustainable location for growth considered through site selection and assessed through the Sustainability Appraisal.</p> <p>Forms part of site allocation in policy SA6.</p>	Removed from Green Belt to represent the Local Plan strategy accurately.

<sup>3</sup> NPPF paragraph 147

<sup>4</sup> NPPF paragraph 110 and 115

3	Land north of Brompton Farm Road	Yes	Yes	<p>Following the priority set out in paragraph 148 of the NPPF, no Green Belt land is proposed for release. The most suitable grey belt land is released in preference to Green Belt.</p> <p>This grey belt parcel is preferable in meeting needs<sup>5</sup> and promoting sustainable patterns<sup>6</sup> of growth in combination with parcels 2, 3, 4 and Gravesham land. Additional consideration that informed decision making included:</p> <ul style="list-style-type: none"> <li>• Gravesham BC require Chapter Farm to meet their housing need.</li> <li>• Impact of Lower Thames Crossing required a measured approach of directing a limited quantum of growth in the Medway Valley.</li> </ul> <p>The cross border site allocation provides a robust sustainable location for growth considered through site selection and assessed through the Sustainability Appraisal.</p> <p>Forms part of site allocation in policy SA6.</p>	Removed from Green Belt to represent the Local Plan strategy accurately.
4	Land at Brompton Farm Road/Stone Horse Lane	Yes	Yes	<p>Following the priority set out in paragraph 148 of the NPPF, no Green Belt land is proposed for release. The most suitable grey belt land is released in preference to Green Belt.</p>	Removed from Green Belt to represent the Local Plan strategy accurately.

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<sup>5</sup> NPPF paragraph 147

<sup>6</sup> NPPF paragraph 110 and 115

				<p>This grey belt parcel is preferable in meeting needs<sup>7</sup> and promoting sustainable patterns<sup>8</sup> of growth in combination with parcels 2, 3, 4 and Gravesham land. Additional consideration that informed decision making included:</p> <ul style="list-style-type: none"> <li>• Gravesham BC require Chapter Farm to meet their housing need.</li> <li>• Impact of Lower Thames Crossing required a measured approach of directing a limited quantum of growth in the Medway Valley.</li> </ul> <p>The cross border site allocation provides a robust sustainable location for growth considered through site selection and assessed through the Sustainability Appraisal.</p> <p>Forms part of site allocation in policy SA6.</p>	
5	Dillywood Lane	No	No		No change to Green Belt Boundary
6	Land north of A289/Hasted Road	No	No		No change to Green Belt Boundary
7	Land between Ranscombe Farm and railway line edge	No	No		No change to Green Belt Boundary

<sup>7</sup> NPPF paragraph 147

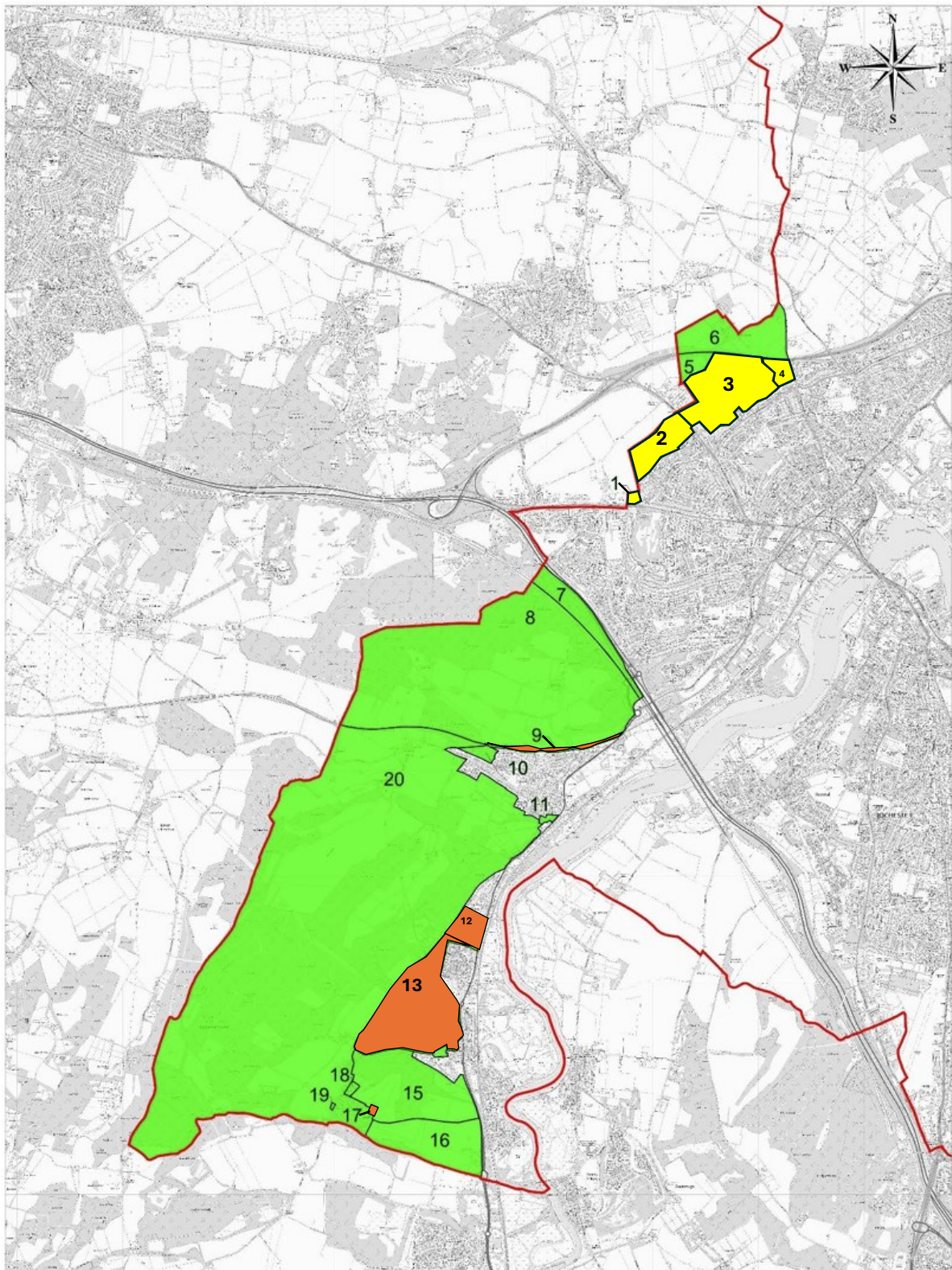
<sup>8</sup> NPPF paragraph 110 and 115

8	Ranscombe Farm	No	No		No change to Green Belt Boundary
9	Railway line edge at Cuxton	Yes	No	Delivery may be unlikely due to site constraints. Provides a suitable buffer between the residential village of Cuxton and the railway line.	No change to Green Belt Boundary
10	Land west of Cuxton bordering Ranscombe Farm	No	No		No change to Green Belt Boundary
11	Land south of Cuxton along A228	No	No		No change to Green Belt Boundary
12	North Halling along A228	Yes	No	<p>Following the priority set out in paragraph 148 of the NPPF, no Green Belt land is proposed for release. The most suitable and preferable grey belt land is released in preference to Green Belt, which includes parcels 1, 2, 3 and 4 as part of Policy SA6.</p> <p>Additional points of consideration as part of decision-making:</p> <ul style="list-style-type: none"> <li>• The impact of Lower Thames Crossing required a measured approach of directing a limited quantum of growth in the Medway Valley. Parcels forming policy SA6 was carried forward as preferable.</li> <li>• Development could be harmful, i.e. the upper slopes will need to be kept open to protect landscape views and setting of the Kent Downs National Landscape, Ancient Woodland and Green Belt.</li> </ul>	No change to Green Belt Boundary

				Not identified as a site allocation in the Local Plan.	
13	St Andrews Lakes	Yes	No	<p>Following the priority set out in paragraph 148 of the NPPF, no Green Belt land is proposed for release. The most suitable and preferable grey belt land is released in preference to Green Belt, which includes parcels 1, 2, 3 and 4 as part of Policy SA6.</p> <p>Additional points of consideration as part of decision-making:</p> <ul style="list-style-type: none"> <li>• The impact of Lower Thames Crossing required a measured approach of directing a limited quantum of growth in the Medway Valley. Parcels forming policy SA6 was carried forward as preferable.</li> <li>• The current recreational use requires tranquillity.</li> <li>• The parcel sits adjacent to the Kent Downs National Landscapes and SSSI, which requires a sensitive approach to avoid harm.</li> </ul> <p>Not identified as a site allocation in the Local Plan.</p>	No change to Green Belt Boundary
14	Vicarage Road	No	No		No change to Green Belt Boundary
15	Land between Upper Halling and Halling	No	No		No change to Green Belt Boundary

16	Land to the east of Upper Halling	No	No		No change to Green Belt Boundary
17	Former reservoir in Upper Halling	Yes	No	The parcel sits adjacent to the village of Upper Halling and should be treated in the same way as washed over Green Belt to retain the integrity of the Green Belt as a whole and to ensure consistency with the approach to Upper Halling.	No change to Green Belt Boundary
18	Upper Halling recreational ground	No	No		No change to Green Belt Boundary
19	Land at Chapel Lane	No	No		No change to Green Belt Boundary
20	Land bordering	No	No		No change to Green Belt Boundary

## A.2. Maps of grey belt parcels



### Greenbelt Assessment Areas



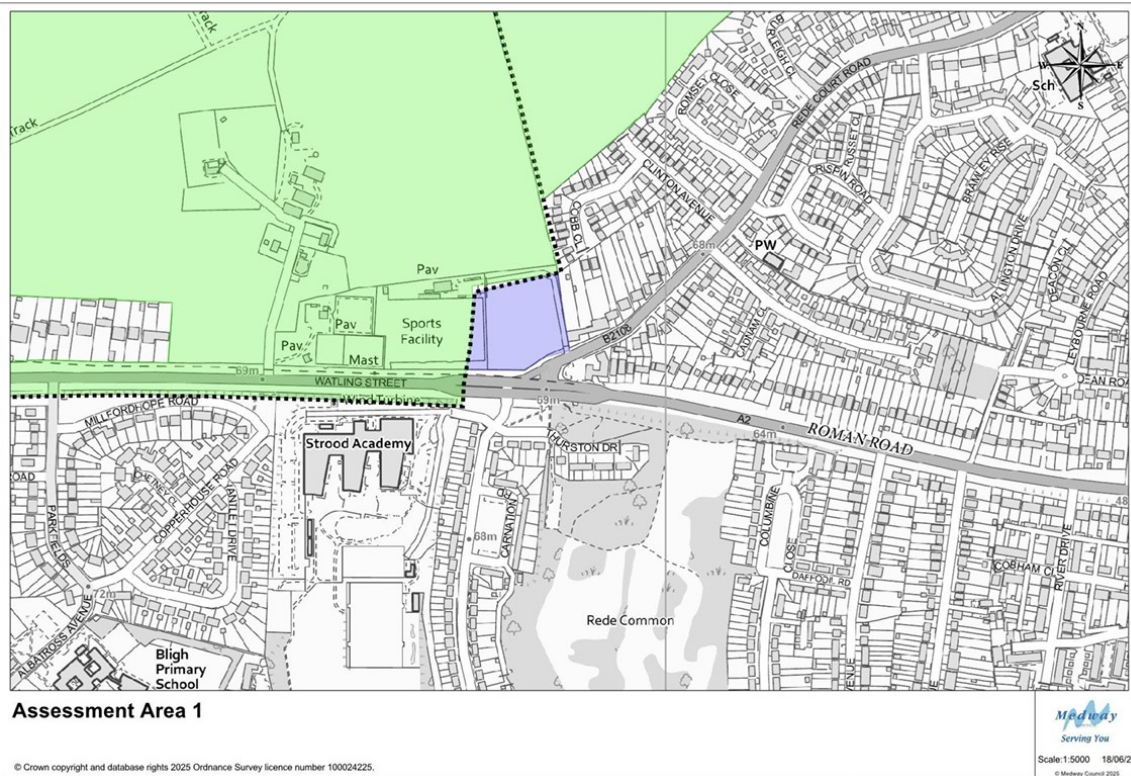
-  Grey belt parcels not released
-  Grey belt parcels released



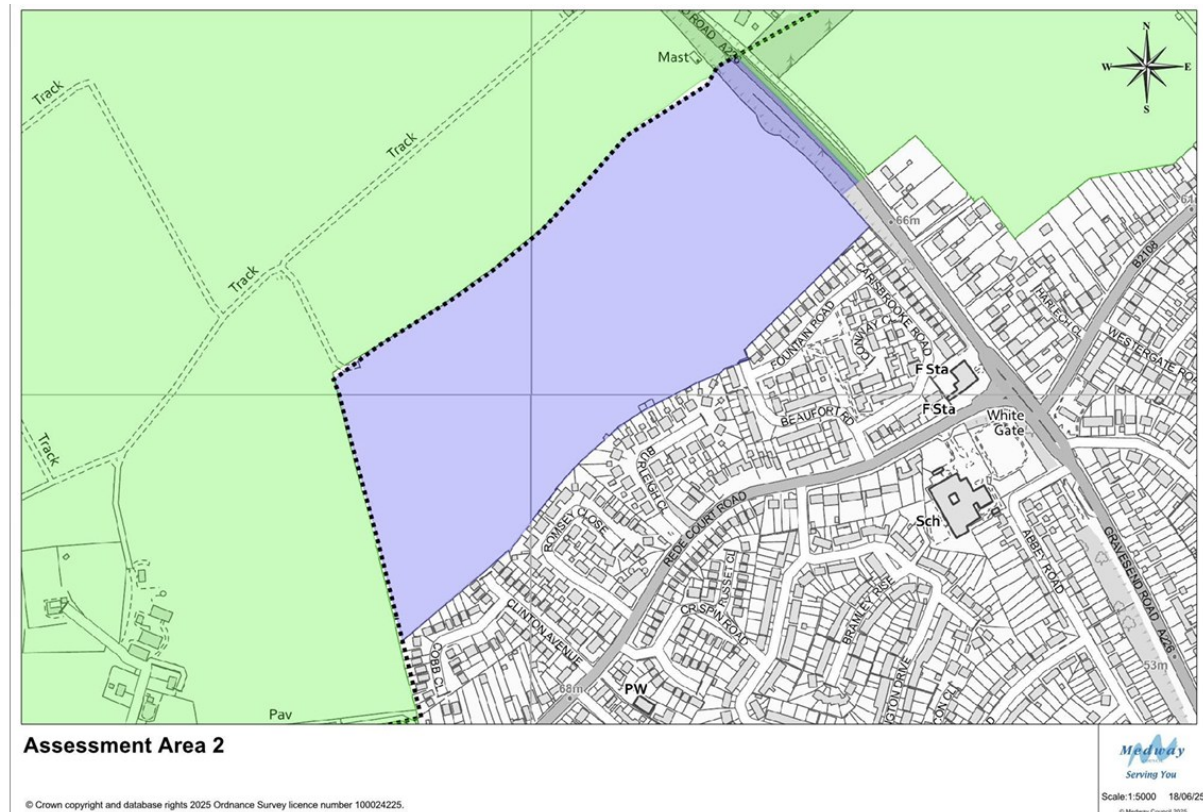
Figure 1: Grey belt parcels

## A.3. Parcels

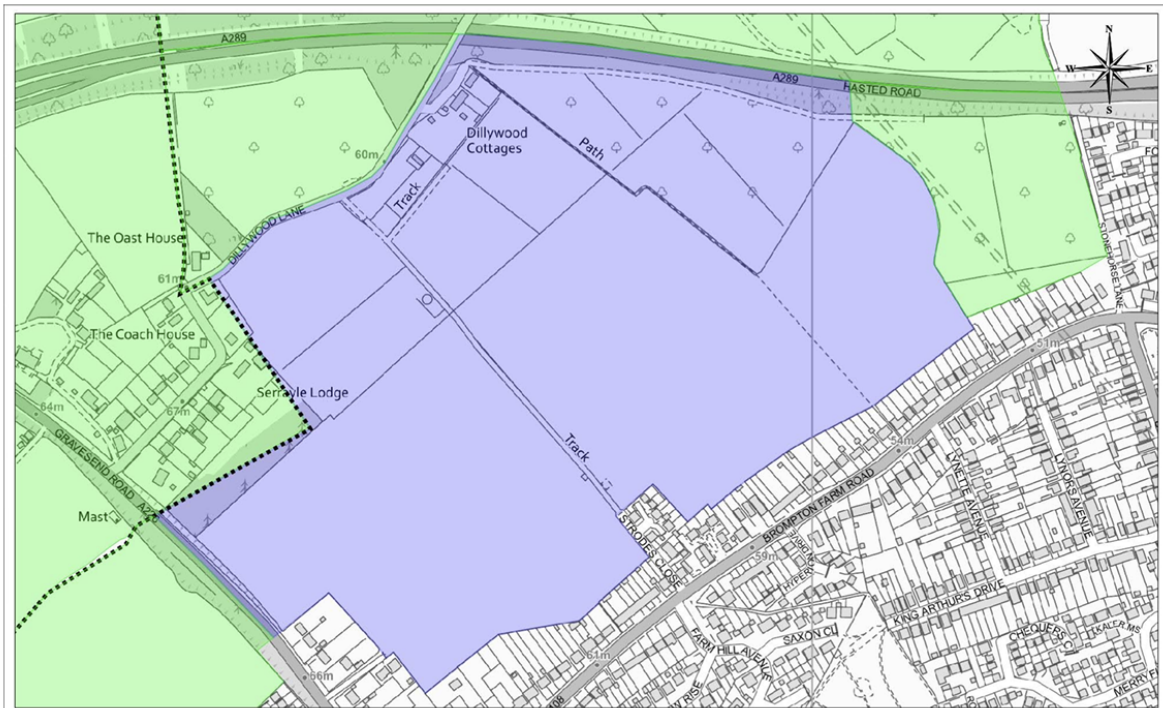
### A.3.1 Parcel 1: Rochester Football Club



### A.3.2 Parcel 2: Land north of Rede Court Road



### A.3.3. Parcel 3: Brompton Farm Road

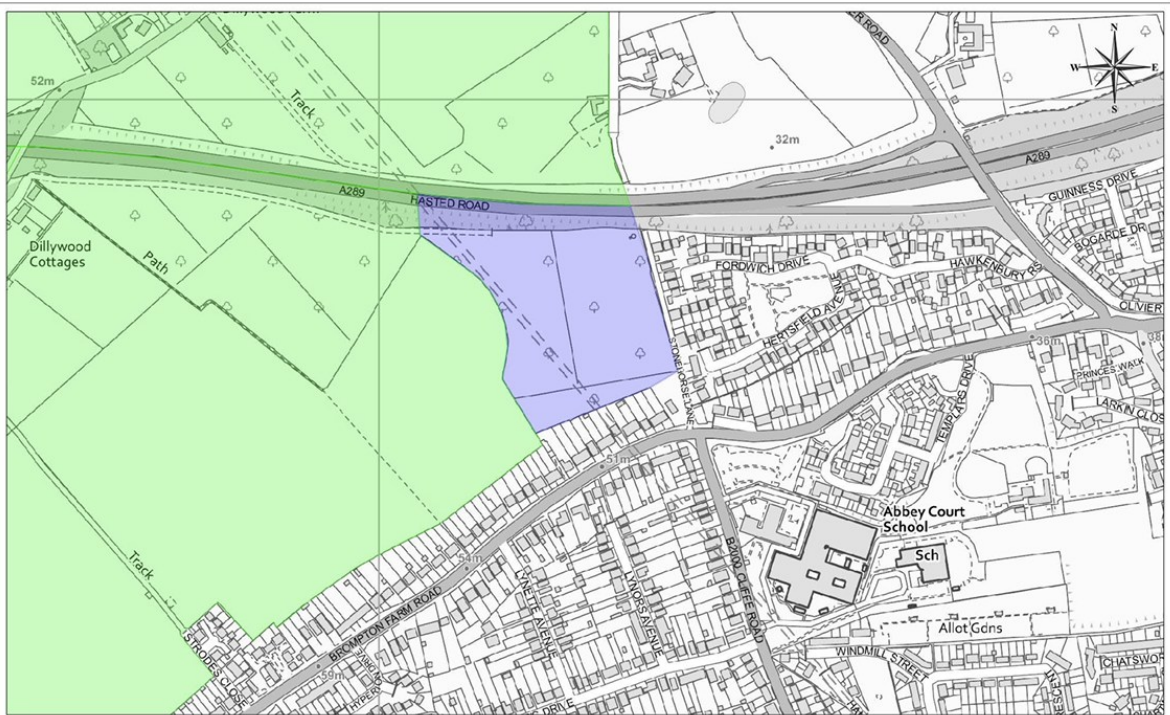


**Assessment Area 3**

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### A.3.4. Parcel 4: Brompton Farm/Stone Horse Lane

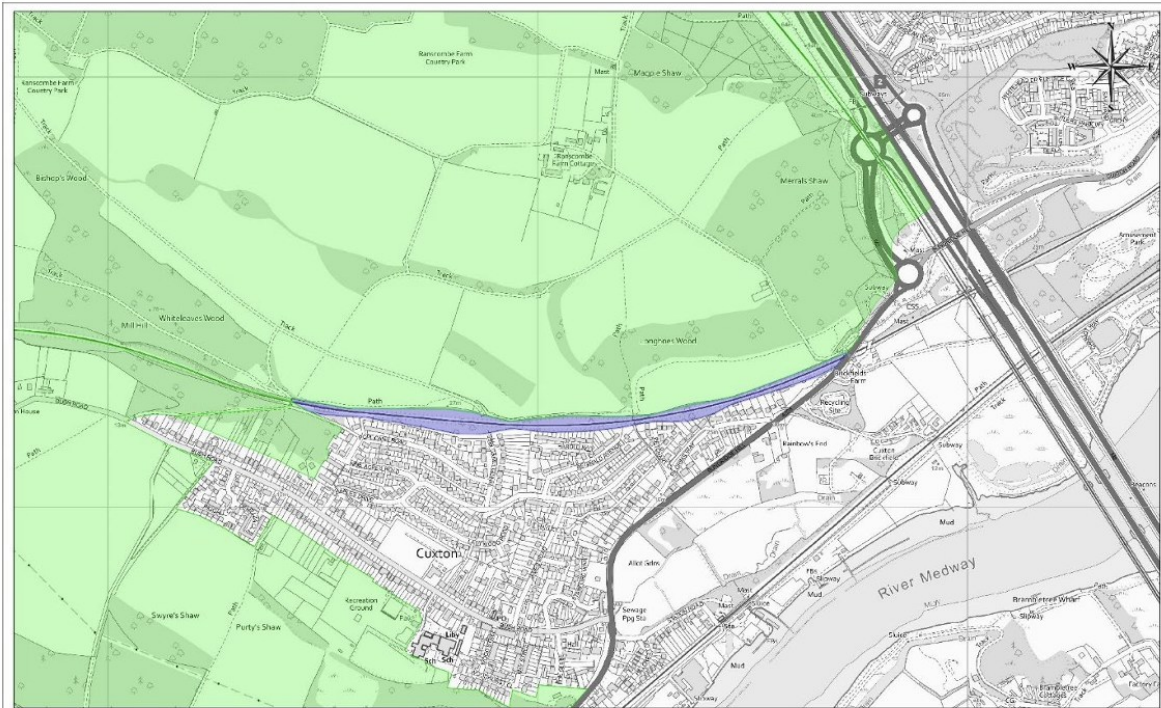


**Assessment Area 4**

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**Madaly**  
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### A.3.5. Parcel 9: Railway line edge

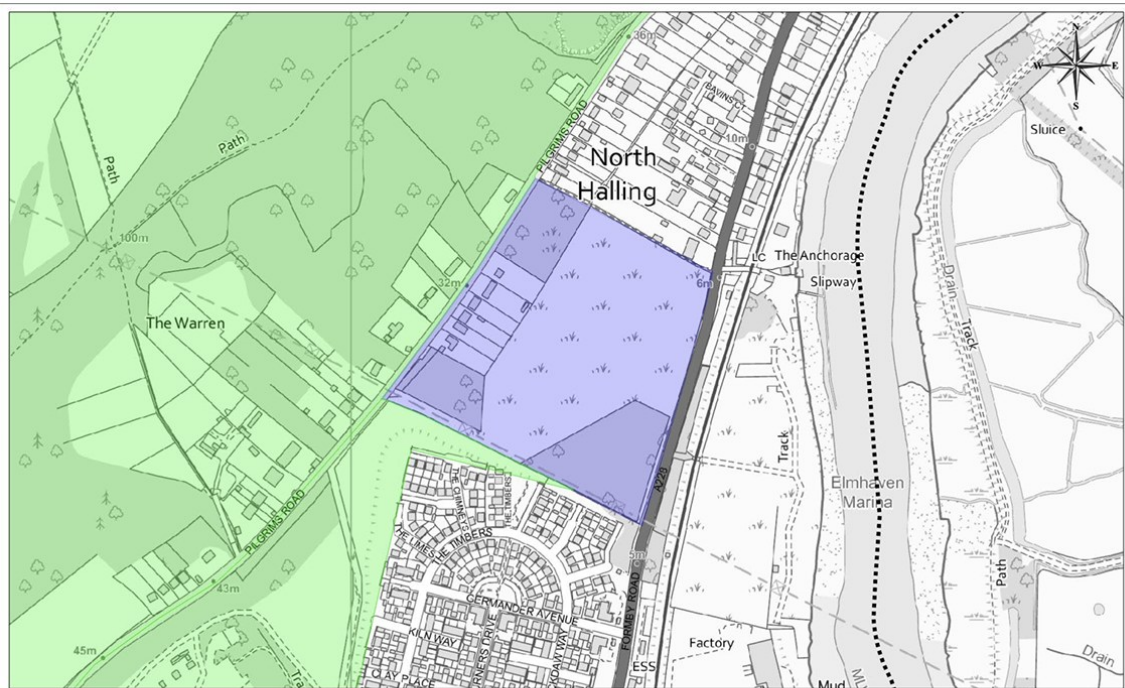


**Assessment Area 9**

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### A.3.6. Parcel 12: North Halling

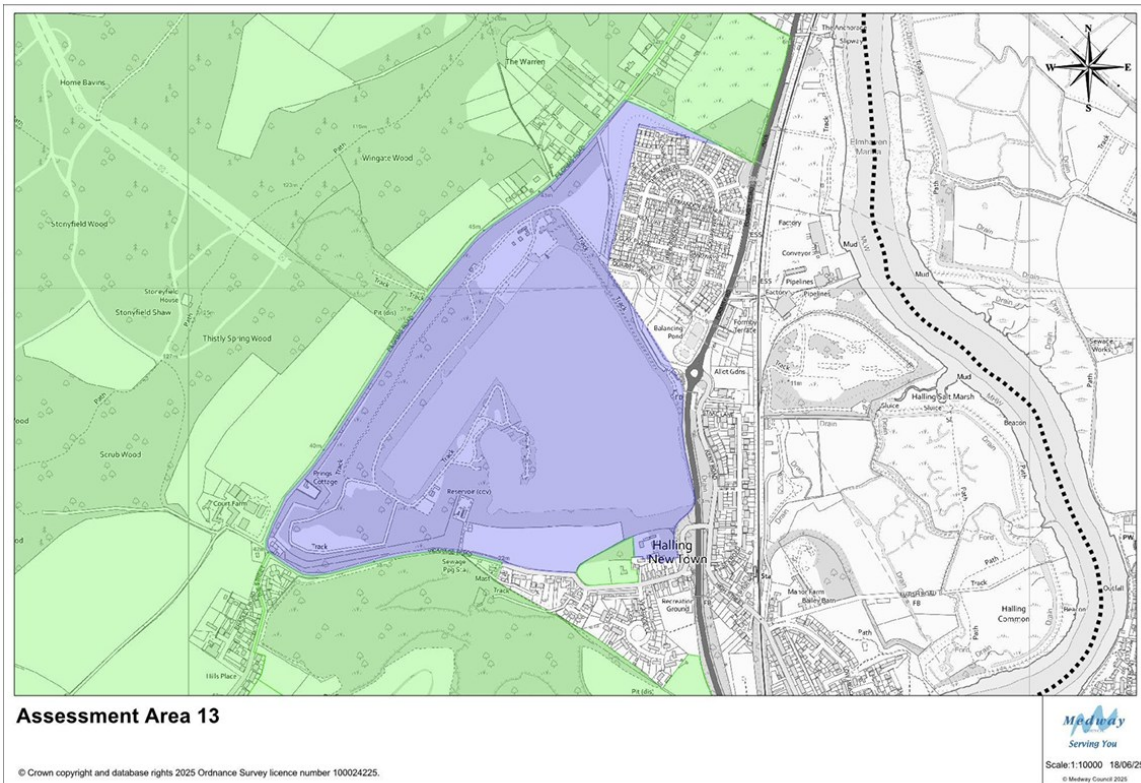


**Assessment Area 12**

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### A.3.7. Parcel 13: St Andrews Lakes



### A.3.8. Parcel 17: Former reservoir in Upper Halling



## Appendix 2

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### Gravesham BC letter of support



**Environment Directorate**

**Ask for:** Shazad Ghani

**Telephone:** [REDACTED]

[REDACTED]  
**Date:** 6 May 2026

Catherine Smith  
Head of Planning Policy  
Planning Service  
Medway Council  
Gun Wharf, Dock Road  
Chatham  
Kent ME4 4TR

Dear Catherine,

**RE: MLP/ED5**

Following on from the Duty to Cooperate meeting held between Medway Council and Gravesham Borough Council, related to our emerging Local Plans on 16th April 2026, on behalf of Gravesham Borough Council, we would like to clarify the Inspector's query regarding our Green Belt Review.

Gravesham's Local Plan Core Strategy adopted in 2014, recognises that the Borough's future development requirements cannot be met from the urban area alone, as such the Council via the current Development Plan undertook to review the Borough's Green Belt to accommodate future growth, as well as undertaking a new Strategic Housing Market Assessment. The latter document was progressed jointly with Medway Council in the form of a Strategic Housing and Employment Needs Assessment (SHENA). This document was subsequently superseded by evidence commissioned by each local authority in relation to housing, retail and employment matters.

Gravesham's existing [Local Housing Needs Assessment \(LHNA\)](#), sets out that the Borough's housing need is for approximately 672 dwellings per year, with an annual imbalance of 255 dwellings per year for affordable housing. The Borough's Strategic Housing Land Availability Assessment (SHLAA) does not identify sufficient sites within the urban area and from settlements inset from the Green Belt, to meet this need. In addition, via discussions with neighbouring authorities, it is clear that they are not in a position to contribute towards meeting Gravesham's unmet need.

Gravesham Borough Council has via its own emerging Local Plan sought to meet its needs through brownfield regeneration in the urban area and sustainable green belt release from the rural area. Gravesham Local Plan preparation introduces a sustainable green belt release at Chapter Farm within Gravesham, adjacent to Strood. Engagement with Medway planning officers led to the exploration of a joint master planned approach to a cross-boundary strategic site allocation west of Strood.

**Phone** 01474 33 70 00

**Website** [www.gravesham.gov.uk](http://www.gravesham.gov.uk)

Gravesham Borough Council has undertaken and published the following documents to inform its emerging Local Plan:

- [Gravesham Stage 1 Green Belt Study](#) - The purpose of the Gravesham Green Belt Study (April 2018) is to provide an objective assessment of how different parcels of land across the borough contribute to the five purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF).
- [Gravesham Stage 2 Green Belt Study](#) and [Appendices](#) – The purpose of the Stage 2 Green Belt assessment (August 2020), is to consider the extent of the harm to the purposes of the Green Belt of releasing land around the urban area and rural settlements inset from the Green Belt within the Borough, to inform future options for accommodating development in the Borough. In this study the Chapter Farm site falls under Three Crutches, and is given the reference TC1, TC2 and TC3.
- [Culverstone Green Belt Boundary Review Report and Annex](#) - The purpose of the Culverstone Green Boundary Review Report and Annex is to evaluate and refine the village boundary of Culverstone Green to ensure it accurately reflects the current extent of development while protecting the surrounding Green Belt and the Kent Downs Area of Outstanding Natural Beauty.
- [Gravesham Landscape Sensitivity and Capacity Studyw \(5\).pdf](#) – This study provides an assessment of the landscape and visual sensitivities within defined assessment parcels around existing settlements in Gravesham. The study makes judgements concerning the capacity of the landscape within the Borough to accommodate new built development.

The emerging Gravesham Local Plan includes the ongoing preparation of a further Green Belt Study, with engagement with Medway on its methodology. This study will set out the exceptional circumstances justifying changes to Gravesham Borough's Green Belt boundary.

Yours sincerely,

Shazad Ghani  
Head of Planning

## Appendix 3

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### **Duty to Cooperate meeting notes**

# Record of Duty to Cooperate Meeting

## Date

22 April 2024

## Organisations

Gravesham Borough Council (GBC) and Medway Council (MC)

## Gravesham Borough Council Attendees

Sian Morley, Senior Planner (Planning Policy)

Geoff Baker, Senior Planner (Planning Policy)

## Medway Council Attendees

Catherine Smith, Head of Planning Policy

Prem Velayutham, Principal Planner (Planning Policy & Corporate Projects)

Ellie McGuckin, Senior Planner (Infrastructure)

Andrew Bull, Principal Planner (Spatial Data & Infrastructure)

## Discussion

### Chapter Farm

- Land bounded by Hasted Way (A289), Gravesend Road and Watling Street (A2) at Chapter Farm has been promoted for development in GBC's emerging Local Plan. A working group, comprising officers from both local planning authorities, could consider the cross-boundary implications of a sustainable urban extension. The function of the Green Belt would be a key consideration.

### Scoping of strategic planning matters

- The following potential strategic planning matters were identified:
  - potential unmet housing need;
  - Green Belt;
  - Gypsy and Traveller accommodation needs;
  - Lower Thames Crossing; and
  - Biodiversity Net Gain and nature recovery.
- GBC would review potential shared strategic planning matters in due course.

## AOB

### Gravesham Borough Council

- Confirmed still working to new Local Development Scheme.
- Outlined the content of the next Regulation 19 consultation.
- Outlined evidence base work commissioned so far.

### Medway Council

- Confirmed still working to new Local Development Scheme.

- Outlined the content of the next Regulation 18 consultation.
- Confirmed that the new Local Plan would seek to meet local housing need according to the standard method.
- Development Management colleagues are leading on Biodiversity Net Gain.
- Outlined evidence base work commissioned so far.

## Outcomes

- GBC consider their unmet housing need to be 2,000 homes.
- MC is seeking to meet local housing needs according to the standard method.
- The Green Belt is a shared strategic planning matter.
- GBC and MC agreed to share respective outputs from traffic modelling to inform further discussion to scope interventions around M2 junctions and the A289.
- Other shared strategic planning matters are to be agreed.

## Actions

	What	Who	Completed
1	GBC to share an update on employment issues and land with MC once available.	Sian Morley	
2	MC to share an update on GTAA once available.	Catherine Smith	
3	MC to share outputs from traffic modelling once available.	Andrew Bull	
4	GBC to share outputs from traffic modelling once available.	Geoff Baker	
5	Ask Jacobs to carry out a simple comparison between LTAM and local plan models to ensure flow consistency.	Andrew Bull	
6	Ask Jacobs to carry out a simple comparison between LTAM and local plan models to ensure flow consistency.	Geoff Baker	
7	GBC to share indicative layout of Chapter Farm / Three Crutches.	Sian Morley	
8	MC to share an update on BNG applications.	Catherine Smith	
9	GBC to review potential shared strategic planning matters.	Sian Morley	

## Agreement between the organisations

This is an agreed record of the meeting.

### Gravesham Council

Geoff Baker, Senior Planner (Planning Policy), agreed on 19 September 2024.

### Medway Council

Catherine Smith, Head of Planning Policy, agreed on 19 September 2024.

# Record of Duty to Cooperate Meeting

## Date

19 September 2024

## Organisations

Gravesham Borough Council (GBC) and Medway Council (MC)

## Gravesham Borough Council Attendees

Shazad Ghani, Head of Planning

Geoff Baker, Senior Planner (Planning Policy)

## Medway Council Attendees

Catherine Smith, Head of Planning Policy

Ellie Sime, Senior Planner (Infrastructure)

Andrew Bull, Principal Planner (Spatial Data & Infrastructure)

## Discussion

### Unmet housing need update

- GBC noted that two sites, comprising 4,500 homes in total, have not come forward as quickly as anticipated. Consequently, GBC's assessment of unmet need of up to 2,000 homes remains.
- MC explained that an interim Land Availability Assessment (LAA) was published in September 2023. MC could not publish an updated LAA to support the recent Regulation 18b consultation, however work is ongoing, and this will be informed by the evidence base. Meanwhile, MC has commissioned a Local Housing Need Assessment, which is due to be completed in December. Therefore, at this time, MC cannot determine if it could accommodate GBC's assessment of its unmet need. Once MC's evidence base has progressed, it is possible that MC may declare an unmet housing need.

### Gypsy and Traveller accommodation

- GBC will report on a revised Gypsy and Traveller accommodation assessment in due course.
- MC published a Gypsy and Traveller Accommodation Assessment to support its Regulation 18b consultation in July.

### Chapter Farm

- Land bounded by Hasted Way (A289), Gravesend Road and Watling Street (A2) at Chapter Farm has been promoted for development in GBC's emerging Local Plan. A working group, comprising officers from both local planning authorities, could consider the cross-boundary implications of a sustainable urban extension. The function of the Green Belt would be a key consideration.

### Lower Thames Crossing

- A decision to grant development consent by the Secretary of State for Transport is due by 4 October.

- If consent is granted, officers may be required to engage in post-decision matters.
- GBC noted the late representations received regarding the rest and service areas close to M2 junction 2.

### Traffic modelling co-ordination

- GBC's traffic modelling will need to be informed by current work on employment land.
- Given the high costs of traffic modelling, it may be prudent to wait for the decision to grant development consent for the Lower Thames Crossing due by 4 October, thereby avoiding the need for a with/without Lower Thames Crossing scenario as required by National Highways to date.
- The timing of MC's next phase of traffic modelling to support the draft Local Plan will depend on the progress of other evidence base work streams. This is likely to resume in January.
- By January, GBC would be able to share information about its potential site allocations and vice-versa, thereby demonstrating our close collaboration on this strategic planning matter. This may help to reduce our respective costs for traffic modelling.
- MC's traffic modelling may be supported by a transport strategy to determine a more aspirational future scenario, e.g. lower car trip generation due to a lower car parking standard in town centres, internalisation, and modal shifts. In a Regulation 18b consultation response, National Highways advised this could be assessed in the traffic model to avoid the over-provision of highway mitigations. However, MC and GBC noted the high costs of traffic modelling.

### A2 Air Quality Management Area assessment

- GBC noted that Jacobs will carry out an assessment on the A2 Air Quality Management Area to support the Habitat Regulations Assessment (HRA).
- Lepus, working on behalf of MC, is liaising directly with Jacobs with regard to data requirements for the HRA.

### Identification of shared strategic planning matters

- Following three meetings between GBC and MC since 22 March 2024, the following shared strategic planning matters have been identified:
  - potential unmet housing need;
  - Chapter Farm;
  - Green Belt;
  - Gypsy and Traveller accommodation needs;
  - Lower Thames Crossing and the Strategic Road Network;
  - A2 Air Quality Management Area; and
  - Biodiversity Net Gain and nature recovery.

## AOB

### Gravesham Borough Council

- Outlined evidence base work commissioned so far and work due to be commissioned.

### Medway Council

- Outlined evidence base work commissioned so far and work due to be commissioned.

- MC noted that the High Court has dismissed Bredhurst Parish Council’s challenge to overturn Maidstone Borough Council’s site allocation for 2,000 homes at Lidsing. MC will collaborate with Maidstone Borough Council on their supplementary planning document.

## Outcomes

- GBC consider their unmet housing need to be up to 2,000 homes.
- MC is seeking to meet local housing needs according to the standard method. At this time, MC cannot determine if it could accommodate GBC’s assessment of its unmet need. Once MC’s evidence base has progressed, it is possible that MC may declare an unmet housing need.
- A working group, comprising officers from both local planning authorities, will consider the cross-boundary implications of a sustainable urban extension at Chapter Farm.
- GBC and MC will share information about their respective potential site allocations.
- Seven shared strategic planning matters have been identified. These matters will set the agenda for future meetings and activities.

## Actions

	What	Who	Completed
1	GBC to share an update on employment issues and land with MC once available.	Sian Morley	
2	MC to share an update on GTAA once available.	Catherine Smith	July 2024
3	MC to share outputs from traffic modelling once available.	Andrew Bull	July 2024
4	GBC to share outputs from traffic modelling once available.	Geoff Baker	
5	Ask Jacobs to carry out a simple comparison between LTAM and local plan models to ensure flow consistency.	Andrew Bull	
6	Ask Jacobs to carry out a simple comparison between LTAM and local plan models to ensure flow consistency.	Geoff Baker	
7	GBC to share indicative layout of Chapter Farm / Three Crutches.	Sian Morley	May 2024
8	MC to share an update on BNG applications.	Catherine Smith	
9	GBC to review potential shared strategic planning matters.	Sian Morley	May 2024
10	Set up a working group, comprising officers from both local planning authorities, to consider the cross-boundary implications of a sustainable urban extension at Chapter Farm.	Prem Velayutham	

<b>11</b>	Arrange a meeting between GBC, MC, and Jacobs to consider the merits of a combined assessment in the Kent Strategic Model.	Andrew Bull	
<b>12</b>	Clarify whether National Highways still require with and without Lower Thames Crossing traffic modelling scenarios post-DCO decision.	Andrew Bull	
<b>13</b>	Seek funding available from National Highways for traffic modelling.	Andrew Bull	

## Agreement between the organisations

This is an agreed record of the meeting.

### Gravesham Council

Shazad Ghani, Head of Planning, agreed on 20 September 2024.

### Medway Council

Catherine Smith, Head of Planning Policy, agreed on 20 September 2024.

## Appendix 4

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### **Consultants meeting agenda and notes**

## GBC/MC Green Belt Review Meeting

9 April 2025

### Attending

Chloe Salisbury (Arup)

PV (Medway) SEM (Gravesham)

The scope of the commission was outlined and the aspects which GBC/MC wished to discuss were

- Thoughts on how the work could be progressed given the scope.
  - Whether Arup have a defined methodology
  - Realistic timescales for undertaking the commission
  - Capacity for local team to undertake the work
- 

### Approach to the commission given the project scope

- Discussed breaking the commission into parts as follows:
  - Part A
    - critique of the Medway Green Belt Assessment + Grey Belt addendum to determine its' robustness,
    - assessment of the master plan area plus Medway Green Belt against the guidance including whether release of the master plan area would fundamentally undermine the 5 GB purposes of the remaining GB across the LP area in Medway and in Gravesham.
  - Part B
    - Review of Gravesham's stage 2 GB Assessment for any changes + assessment of the Green Belt against the guidance. Discussion about breaking this down into two parts follows:
      - Part Bi targeted parcel assessment focussed initially on the most sustainable settlements established through the Local Plan (to accord with the principles of paragraph 110 and 115 of the NPPF). To undertake this – Arup would need to understand the justification of such an approach to support this i.e. the growth strategy.
      - Part Bii Assessment of the remainder of the Borough to address the DM requirement.
- Arup considered that for both plan making and development management it would be better to undertake a comprehensive review of all the Green Belt and then select those sites that are most sustainable.
- Gravesham would need to further consider the implications of a staged approach.
- While Medway's time frame is slightly more pressing GBC would be keen to progress the Part A and Part Bi at the same time as we too are working to a July deadline.

## Methodology

- Arup indicated that the methodology was evolving as they worked with different LPA's, particularly around the interpretation of the GB purposes to provide clarity for assessment.

## Timescale

- Discussed time frames and realistically, it is not considered that the Gravesham element would be completed within 6 weeks as originally suggested.
- Discussion around a potential timetable for Part A work concluded that this would take between 6 – 8 weeks to complete excluding procurement process, subject to prompt feedback and data detailing pdl land upfront.

## Capacity

- Given current projects in progress locally, Arup agreed further consider their capacity to undertake another commission, particularly as GBC/MC would preferably want a local team.

## Costs

- Arup agreed to share some indicative costings for this commission

## Actions

GBC agreed to send a summary of the meeting plus a plan of the Chapter Farm Master Plan area

GBC to give further consideration to scope of the GB Review for Gravesham and breaking the Review into parts

Confirmation sought from Arup of:

- Capacity of local teams to undertake the work
- Timescales of how quickly they could commence Part A/Part Bi work and the timeframe for delivery of a final draft of these two elements taking account of the scale of work that is already in track locally
- Cost estimate

MC agreed to send through their inhouse Green Belt work.

## Green Belt Meeting agenda

8 May 2025

Scope of the work that we were seeking to commission and setting out that we wanted to understand

- Thoughts on how the work could be progressed given the scope.
  - a critique of the Medway Green Belt Assessment + Grey Belt addendum to determine its' robustness plus a focussed review of the Gravesham Green Belt Stage 2 Assessment in relation to a large site straddling the Gravesham/Medway boundary which is being proposed for as a residential allocation, and whether its allocation would fundamentally undermine the 5 purposes of the remaining Green Belt in Medway and Gravesham
  - a review our Stage 2 Green Belt Study (which focusses on those settlements inset from the Green Belt and the urban edge) in the light of the new guidance, to inform and support the release of land to support the emerging Local Plan and site allocations **and** assess the harm of such releases of the overall purposes of the Green Belt in Gravesham.
- Understanding of how LUC see the scope of a Grey Belt Study, i.e. what are the various steps. How does that fit in with the scope of what I have suggested above. Whether LUC have a defined methodology.
- Capacity for local team to undertake the work
- Realistic timescales for undertaking the commission – prefer a local team to undertake the work
- Costs – ballpark