

Matter 5 – Green Belt

Issues

Whether the approach to the Green Belt is consistent with national policy.

Whether there are exceptional circumstances to justify altering Green Belt boundaries.

Whether the approach adequately and effectively protects the remaining areas of the Green Belt.

Questions

Policy S7: Green Belt

5.10 What are the differences between the methodologies that have been engaged by the Council and Gravesham Borough Council in the respective Green Belt reviews, given that the proposed respective releases at Land west of Strood and Chapter Farm lie adjacent to one another.

The Council's Green Belt Review (B8) reviewed, as a starting point, its 2018 Green Belt Review and then considered the issue of grey belt. Medway's spatial strategy and decision to allocate land at Strood West development pre-dates the introduction of the concept of grey belt in the NPPF.

Gravesham Council published a Stage 2 Green Belt Study in August 2020. This does not appear to have been updated to assess the implications of the grey belt concept, as set out in the 2024 NPPF.

In setting out its spatial strategy (policy LP01) and allocating land at Strood West, land at Chapter Farm (policy LP6), Gravesham Borough Council appears to have glossed over the Green Belt status of this site.

With respect to the Gravesham parcels of land at Strood West, it was noted in the 2020 Green Belt study that development of parcels TC1 and TC2 would result in moderate harm and high harm (respectively) to the Green Belt.

Like the Strood West Medway sites, these sites play an important role in preventing the neighbouring towns of Strood and Gravesend from merging into one another.

Medway Council's Green Belt Review (B8) confirms that the Green Belt parcels (2, 3 & 4) making up the allocation SA6 would weaken the contribution of the Green Belt in Gravesham if they were released, due to the urbanising influences of its development.

We believe the Council has not justified its position in terms of loss of Green Belt (which by default has been assessed as grey belt because of Gravesham's proposals at Chapter Farm).

5.11 As the Green Belt Note (MLP/ED7) (page 9) sets out that the release of land at Chapter Farm in Gravesham Borough Council would need to come forward for there to be exceptional circumstances to justify the release of land west of Strood, is there a clear risk that such exceptional circumstances may not be demonstrated, especially as Gravesham is not as advanced in its Local Plan preparation as the Council?

In our representations on policy SA6 CPRE Kent we set out our objections to this allocation on the grounds that it would result in loss of green belt and best and most versatile agricultural land; would have a harmful impact on the setting of the Kent Downs National Landscape and be detrimental to the Dilly Wood Lane Area of Local Landscape Importance.

As set out above, we believe the Council has not justified its position in terms of loss of Green Belt and is being overly reliant on the timely ability of the Gravesham housing market to deliver housing west of Strood, despite the fact that its Local Plan has not yet been submitted for examination.

5.12 Are there any other matters that the Council would wish to draw our attention to as regards the exceptional circumstances for the release of Green Belt land to the west of Strood?

This cross-boundary Green Belt issue places development in the rural area within the hands of another local authority over which neither has complete control. Accordingly, we query whether sufficient measures have been put in place to ensure that development within the rural area of Medway (and Gravesham) doesn't result in an unsustainably located development in the event that either Council's plans are not realised.

On this point it should be remembered that the Council has stated on page 9 of ED7 that:

"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.”

5.16 Also having regard to the Council’s response to the Inspector’s initial questions (MLP/ED6) and the subsequent Green Belt Note (MLP/ED7) and Response to the Inspector’s Next Steps (MLP/ED10), is Policy S7 based on robust and up to date evidence?

CPRE Kent believes that the answer to this question is no.

The reason for this is that there is too much uncertainty with regard to the cross-boundary issues regarding the Green Belt to the west of Strood.

The Statement of Common Ground with Prescribed Bodies, which includes Gravesham Borough Council (A12.1) states at paragraph 2.1.6 (housing need) that it is agreed the Council’s SA found that reasonable growth options without Gravesham’s calculation of unmet need performed better overall.

With regard to the Green Belt, paragraph 2.5.1 of the SoCG confirms that: “Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites in Medway to the west of Strood. Development on Gravesham land would compromise the ability or the remaining Medway Green Belt to perform its functions effectively. The prospect of a comprehensive site coming forward in this location would render this location more sustainable and better aligned to the Medway Local Plan. This provides the basis for justifying exceptional circumstances for the release of Green Belt land in this location.”

This again demonstrates that the evidence behind policy S7 is not robust. The reconsideration of parcels 2, 3 and 4 that make up the allocation of land at Strood West (SA6) has apparently been dictated to by pressure from outside the Medway Council boundary. That is, the green belt boundary is not being amended to allow for the development of the site based on evidence (paragraph 4.12.2 of the Local Plan states that the Green Belt west of Strood “performs a significant role in that it serves to retain the strategic gap between the urban areas of Gravesend and Strood”), but instead because of external pressure.

5.17 Is Policy S7 therefore positively prepared, justified, effective and consistent with national policy?

CPRE Kent believes that the answer to this question is no.

As set out above, paragraph 4.12.2 of the Local Plan states that the Green Belt west of Strood “performs a significant role in that it serves to retain the strategic gap between the urban areas of Gravesend and Strood.”

Paragraph 4.12.4 goes on to say: “Exceptional circumstances for the release of parcels of land in this location are strongly justified based on its sustainability when coupled with land adjoining within Gravesham Borough Council (see policy SA6 and the spatial development strategy at 2.3), i.e. this location proves more sustainable than other options considered within the Local Plan.”

We are of the firm view that the most sustainable option for development at Medway would be for a true brownfield first approach (base on an urban capacity study and targeted call for brownfield sites).

In any event, the release of land from the Green Belt is predicated on the delivery of housing on a site that is beyond the control of Medway Council and as such cannot be considered to be justified or effective.