



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

MEDWAY LOCAL PLAN 2041 EXAMINATION IN PUBLIC

Matter 5 Hearing Statement – Green Belt

Iceni Projects Limited on behalf of Barratt David Wilson Kent (“BDW”) (Representor ID: 915)

Introduction

1. This Hearing Statement has been prepared on behalf of Barratt David Wilson Kent (“BDW”) in respect of the Matters, Issues and Questions (Document ref. MLP/ED15) published as part of the Examination in Public (“EiP”) into the emerging Medway Local Plan 2041, prepared by Medway Council (“the Council”).
2. BDW is part of Barratt Redrow, the largest housebuilder in the country, delivering over 17,000 homes annually across the UK. BDW is one of the largest and most prolific developers in Kent with a proven track record of delivering significant new residential communities within the area’s most prominent and high profile key strategic locations. BDW, therefore, has unrivalled experience in delivering residential development in the Kent area.
3. BDW controls a key 16ha landholding known as “Land north of Rede Court” (Site ref. SNF1), which forms part of the draft allocation Land west of Strood under Policy SA6. Land west of Strood is one of the Local Plan’s most important and strategic locations upon which the spatial strategy is predicated on. Based on BDW’s desire to submit an application on its landholding shortly, we believe that the Site can come forward as the first phase of development on Land west of Strood.
4. **BDW is supportive in principle of the draft Local Plan.** In this regard, BDW considers Land at Strood to be a key component of what it considers to be the only realistic spatial strategy capable of meeting Medway’s housing needs in full. BDW’s position on key questions posed by the Local Plan Inspectors is outlined in this submission.

Matter 5: Green Belt

Policy S7: Green Belt

Q5.1: Have the proposed Green Belt boundaries under Policy S7 been defined clearly, using physical features that are readily recognisable and likely to be permanent, following on from the Green Belt Review (B8)?

5. Yes. BDW considers that the revised Green Belt boundary in the vicinity of Land West of Strood has been defined clearly, using physical features that are readily recognisable and likely to be permanent, consistent with paragraph 149(f) of the NPPF 2024. The Council’s Green Belt Review (B8) notes at page 9 that strong boundaries can include natural topography, vegetation (including

protected hedgerows and established and dense tree belts), water bodies and man-made features such as road.

6. In relation to Land north of Rede Court (Site ref. Parcel 2), the new boundary follows durable and clearly recognisable features on the ground. To the north is the existing tree line which screens towards the A289 corridor; to the west is a hedgerow/tree belt. These two features also mark the administrative boundary between Gravesham and Medway. To the east is Gravesend Road (A226) with existing residential development to the south. These features are confirmed within the assessment of Parcel 2 within B8. All of these features are considered to be readily recognisable and likely to be permanent.

Q5.2: Noting the key characteristics of openness and permanence and the five purposes of the Green Belt, is the Council satisfied that the Green Belt boundaries under Policy S7 will not need to be altered at the end of the Plan period?

7. BDW considers that the boundaries have been drawn having regard to their intended permanence in the long term, so that they can endure beyond the plan period, as required by paragraph 145 of the NPPF 2024.
8. First, the Council is seeking to meet its needs in full through the plan-led release of grey belt land. Acknowledging that development cannot be accommodated solely in the urban area and having regard to delivering sustainable development, rather than leaving need unmet, the Council is taking a positive approach of plan-led growth through considered and sustainable Green Belt release. This reduces the risk of speculative development and of further Green Belt release being required in the future, thereby supporting the permanence of the new boundary.
9. Second, the boundary in this location is defined by strong, recognisable features (as set out under Question 5.1) and will be capable of enduring beyond 2041. On that basis BDW is satisfied that the boundaries in the vicinity of Land West of Strood should not need to be altered at the end of the plan period.

Q5.3: Is Policy S7 (first paragraph) consistent with national policy on Green Belt where it refers to the coalescence of settlements?

10. No, it is not consistent as currently worded. Green Belt purpose (b) at paragraph 143 of the NPPF 2024 is *“to prevent neighbouring towns merging into one another”* [emphasis added]. The PPG¹ is also clear that purpose (b) relates to town, not villages, a point the Council itself applied in the Green Belt Review (ref: B8, Section 2.7) by treating Strood and Gravesend as towns and excluding villages such as Cliffe Woods, Cuxton and Halling. The evidence base supporting the Plan indicates that the Council has applied purpose (b) correctly, however, the wording needs to be updated to reflect this.

¹Paragraph: 005 Reference ID: 64-005-20250225 <https://www.gov.uk/guidance/green-belt>

11. To ensure consistency with national policy and the Council's own evidence base, a main modification should be prepared with Policy S7 referring to the coalescence of "towns" rather than "settlements".

Q5.4: Is Policy S7 (third paragraph) consistent with national policy where it states there will not be inappropriate development in the Green Belt?

12. No, it is not consistent as currently worded. An absolute statement that "there will not be inappropriate development in the Green Belt" is inconsistent with national policy. Paragraph 153 of the NPPF 2024 provides that inappropriate development is, by definition, harmful to the Green Belt and should not be approved "except in very special circumstances". National policy therefore expressly allows for inappropriate development to come forward where very special circumstances are demonstrated, and also sets out the categories of development that are not inappropriate (paragraphs 154–155 of the NPPF 2024). Policy S7 should not fetter that national policy position. BDW recommends a main modification so that the third paragraph of Policy S7 reflects the Framework's very special circumstances test and the exceptions in paragraphs 154–155, rather than imposing an unqualified prohibition.

Q5.6: Why was the 2018 Green Belt Review used as the starting point for the Council's Green Belt Review (B8), as stated in the Green Belt Note (MLP/ED7) (page 4), as the approach set out in the National Planning Policy Framework 2024 and the Planning Practice Guidance February 2025 were published after this earlier Green Belt review?

13. BDW considers the Council's approach to be justified. The 2018 Green Belt Review provided a sound and logical starting point: it had already established the extent of Medway's (relatively limited) Green Belt and a robust methodology for identifying parcels using well-defined physical features. The Council has appropriately updated and refreshed it in the limited areas where Green Belt release was being considered, focusing the assessment on those areas and updating the methodology in line with the December 2024 NPPF and the February 2025 PPG.
14. In particular, the five parcels identified in 2018 were disaggregated into twenty more granular parcels to reflect the new grey belt criteria², and each parcel was re-assessed against Green Belt purposes (a), (b) and (d), footnote 7 designations, and the impact of release on the five purposes taken together. Using the 2018 review as a starting point and then updating it in line with the new national policy and guidance is a proportionate and evidence-based approach consistent with paragraph 32 of the NPPF 2024. It does not undermine the robustness of the current evidence base, which post-dates and reflects the 2024 NPPF and 2025 PPG.

Q5.10: 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.

² Paragraph: 004 Reference ID: 64-004-20250225 <https://www.gov.uk/guidance/green-belt>

15. Both authorities undertook Green Belt Reviews in 2018. Medway has since updated its Green Belt Review (June 2025, ref: B8) to reflect the December 2024 NPPF and February 2025 PPG, including the identification of grey belt. Gravesham has not yet completed an equivalent update, however, it is not as advanced in its plan preparation. It is entirely to be expected that two neighbouring authorities preparing plans on different timetables will be at different stages and will have produced Green Belt evidence at different points and using methodologies that reflect the guidance current at the time.
16. What matters for the soundness of the Medway Local Plan is that Medway's own evidence (ref: B8) is up to date and applies the relevant NPPF for examination and current PPG. Medway has engaged with Gravesham over a prolonged period, including through Duty to Cooperate meetings and a shared draft methodology when the authorities jointly sought review funding, in relation to Land West of Strood as a strategic cross-boundary release (Green Belt Note, ref: MLP/ED7, and Duty to Cooperate notes at Appendix 3).
17. Notwithstanding, whilst there is a clear spatial relationship between Land West of Strood and the adjoining Chapter Farm site in Gravesham, Medway's allocation and Green Belt release are assessed and justified on their own merits through Medway's evidence base, as developed below under Questions 5.11 and 5.12.

Q5.11: 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?

18. The Inspectors' question turns on whether there is a "clear risk" that exceptional circumstances may not be demonstrated, given that the Green Belt Note (MLP/ED7, page 9) indicates that release of land at Chapter Farm in Gravesham would need to come forward for exceptional circumstances to justify the release of Land West of Strood, and given that Gravesham is less advanced in its plan preparation. To this regard, BDW makes the following points.
19. It is not considered that there is a "clear risk" that Chapter Farm will not come forward. Gravesham will need to progress its Local Plan in line with the Government's plan-making deadlines, and given the extent of Green Belt in the Borough and the level of housing need identified via the standard method, that plan will necessitate Green Belt release³.
20. Applying the sequential approach in paragraph 148 of the NPPF 2024, through the need to promote sustainable patterns of development, Gravesham should release grey belt land ahead of other Green Belt land where it is in a sustainable location. The Chapter Farm land is considered grey belt (as reflected in Gravesham's Regulation 19 allocation of the land under Policy LP6), and it is a sustainable, well-connected location adjoining Strood. It is therefore an inevitable and logical

³ Paragraph 5.23 of the Gravesham Local Plan (Proposed Submission Version) April 2026

location for development, which substantially reduces the risk that the adjoining land identified for release from the Green Belt within Medway (i.e. Policy SA6) will not come forward.

21. Second, the land in this location includes an artificial historic administrative boundary bisecting what is, in planning and physical terms, a single logical development parcel. It is clearly logical to plan and deliver the whole site comprehensively, a conclusion reinforced by the sustainability of the location and by the creation of the new North Kent unitary authority through the Devolution Priority Programme, which will in due course bring both parcels within a single planning authority. This further reduces the risk of the development not coming forward as a comprehensive whole.
22. Third, and most importantly, the existence and status of the promoted land in Gravesham is relevant context, but it is not determinative of the soundness of the Medway Local Plan. The release of Land West of Strood is justified by Medway's own housing need, its spatial strategy and its Green Belt evidence (ref: B8). The Plan should not rely upon the timing, adoption or implementation of another authority's emerging plan, which is outside Medway Council's control.
23. Exceptional circumstances for the release arise independently within Medway. The allocation responds to Medway's own housing need and strategic development requirements, and there is no soundness requirement for adjoining land in a neighbouring authority to come forward before Land West of Strood can be justified. A contrary approach would make the effectiveness of Medway's Plan dependent on decisions outside its control, which would itself be a soundness concern.
24. BDW recognises that the Green Belt Note (MLP/ED7, page 9) can be read as suggesting that exceptional circumstances would not exist without the parallel release in Gravesham, on the basis that the residual Medway Green Belt west of Gravesend Road would be narrow and poorly performing if Gravesham's land were developed in isolation. That analysis is a legitimate observation about the functioning of the wider Green Belt. However, to the extent that MLP/ED7 is read as making the justification for Land West of Strood contingent on Gravesham's release, BDW respectfully submits that this overstates the position and should be clarified. If the Inspectors consider that MLP/ED7 implies such a dependency, that point should be clarified through a main modification, confirming that the exceptional circumstances for the release of Land West of Strood arise independently within Medway and are not contingent on the adoption or implementation of Gravesham's emerging Local Plan.

Q5.12: 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?

25. BDW draws the Inspectors' attention to the following cumulative factors, which together comprise the exceptional circumstances justifying the release of Land West of Strood, consistent with paragraphs 145–148 of the NPPF 2024:

- **Housing need:** Medway has substantial housing needs to meet over the plan period. The Plan seeks to meet those needs in full, and Land West of Strood makes a significant contribution to that objective, including through early delivery.
- **Lack of reasonable alternatives:** Urban regeneration opportunities are important but insufficient on their own to meet needs in full, with other parts of Medway affected by environmental, infrastructure and delivery constraints. The selected strategy represents a balanced response to those constraints, having examined fully all other reasonable options in accordance with the NPPF 2024 and PPG.
- **Sustainable location:** Land West of Strood adjoins the existing urban area of Strood and can be planned comprehensively with infrastructure, green infrastructure and community facilities. The location supports a sustainable pattern of growth and is served by the A289/M2 corridor and public transport links to Strood District Centre and rail stations.
- **Limited and proportionate Green Belt release:** The release is targeted and necessary to support the spatial strategy and follows the sequential approach in the NPPF. Durable boundaries can be defined using recognisable and permanent features (see Question 5.1), and the remaining Green Belt can continue to perform its intended role. The Green Belt Review confirms that the released parcels (1–4) make only a ‘Moderate’ contribution and are grey belt (ref: B8; Green Belt Exceptional Circumstances Topic Paper, ref: B22.4).

26. Taken together, these factors demonstrate that the exceptional circumstances test is comfortably met on Medway’s own evidence.

Q5.17: Is Policy S7 therefore positively prepared, justified, effective and consistent with national policy?

27. Subject to the modifications identified above, BDW considers that Policy S7 is capable of being found positively prepared, justified, effective and consistent with national policy, and therefore sound, in line with paragraph 36 of the NPPF 2024. The policy is underpinned by a robust and up-to-date Green Belt Review that applies the December 2024 NPPF and February 2025 PPG, supported by the Green Belt Exceptional Circumstances Topic Paper (ref: B22.4) and the Green Belt Note (ref: MLP/ED7).

28. BDW’s view is that any residual soundness concerns can readily be resolved through main modifications, in particular:

- (i) amending the first paragraph of Policy S7 to refer to the coalescence of “towns” rather than “settlements” (Question 5.3);
- (ii) amending the third paragraph so that it reflects the very special circumstances test and the exceptions in Framework paragraphs 153–155 (Question 5.4); and

- (iii) clarifying that the exceptional circumstances for the release of Land West of Strood arise independently within Medway and are not contingent on the release of adjoining land in Gravesham (Question 5.11).

29. With these main modifications, Policy S7 can readily be made sound.

SUMMARY

30. BDW is in general support of the Plan and strongly supports the allocation of Land West of Strood (Policy SA6). The revised Green Belt boundaries in this location are defined by readily recognisable and permanent physical features and, with reinforcement of the western edge through the SA6 masterplan, will endure beyond the plan period. The exceptional circumstances for the release of Land West of Strood are made out on Medway's own housing need, spatial strategy and Green Belt evidence, independently of the position in Gravesham. Policy S7 can be made sound through a small number of main modifications, as set out above, to which BDW respectfully commends the Inspectors.