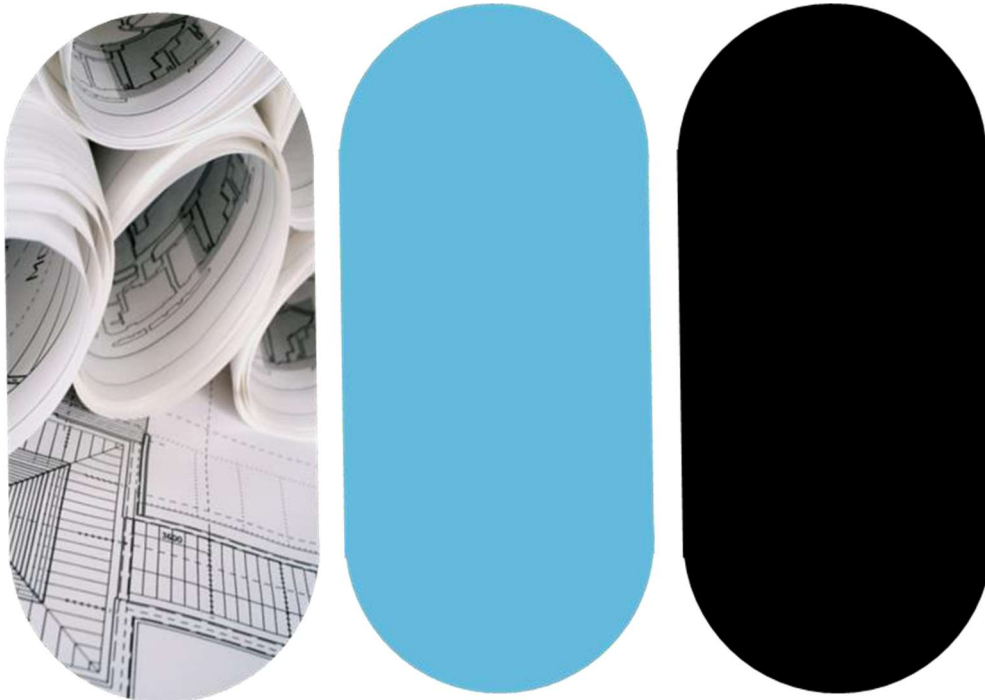




MEDWAY LOCAL PLAN EXAMINATION MATTER 5 HEARING STATEMENT

PREPARED ON BEHALF OF GLEESON LAND

August 2026





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1. INTRODUCTION

- 1.1 This Matter Statement has been prepared on behalf of Gleeson Land in respect of Matter 5 relating to the Green Belt proposals of Medway Council's (MC) Local Plan.
- 1.2 Gleeson Land has interests in the authority area at Land south of Higham Road and east of Buckland Road, Cliffe (LAA Site ID SR6). The site is not identified as an allocation in the Local Plan but is subject to a recent planning application (ref. MC/26/0194) for up to 100 residential dwellings.
- 1.3 Detail relating to the omission site at Cliffe is provided in our Regulation 19 consultation response (August 2025) and not repeated here. However, it should be noted the reasons identified by the Council for not allocating the site have been fully addressed in the current planning application such that the justification for not allocating it has been shown to be not sound. This includes proximity to the SSSI (no objection from relevant consultees), coalescence between settlements (no objection on this basis from the Council's appointed landscape consultant) and proximity to public transport services (no objection from the Council's appointed highways consultant). It should therefore be considered positively should additional sites be required.
- 1.4 This Matter Statement responds to the Inspectors' questions and have been considered in the context of the tests of 'Soundness' as set out at Para 36 of the NPPF (December 2024). These require that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.



2. MATTER 5: GREEN BELT

Q.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?

- 2.1 We consider exceptional circumstances do not exist for land to be released from the Green Belt in this instance.
- 2.2 As indicated by the Inspectors, one such reason is the continued delay with and potential risks associated with reliance on the emerging Gravesham Local Plan. The Gravesham Local Plan has been subject to repeated delays, with the Regulation 18 consultations taking place in April – June 2018 and October – December 2020. It was anticipated the Regulation 19 consultation would take place in a timeframe aligned with the Medway Local Plan Regulation 19 consultation, but this did not happen. The eventual Regulation 19 consultation launched in April 2026 and has concluded as of 18 August 2026 following extensions due to missing evidence base documents.
- 2.3 Whilst it is not for this Examination to consider whether the Gravesham Local Plan will be “sound”, this remains a risk. The Plan includes a heavily reliance on strategic regeneration sites which have experienced viability and delivery issues in recent years. Added to this is the recent Secretary of State dismissal of the redevelopment at Northfleet Harbourside (ref. APP/K2230/V/25/3360355) which the Plan relies on for circa. 3,500 dwellings.
- 2.4 Whilst none of this is in the control of the Council (Medway) it nevertheless relies on the adoption of the Gravesham Local Plan in order to justify release of Green Belt land. We remain concerned that exceptional circumstances cannot be justified at this time.
- 2.5 Further, the NPPF states at para 147 that in order to demonstrate exceptional circumstances the Council must be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. We do not consider this to be the case.
- 2.6 The Green Belt covers circa. 5% of the Medway area. This is a relatively small proportion of the overall Medway area. There remain large areas of search, as reflected in the Sustainability Appraisal, which are unincumbered by this spatial policy designation.
- 2.7 This does not appear to have been reflected in the selection of Spatial Delivery Options (SDO) of the Sustainability Appraisal which has not differentiated between Green Belt and non-Green



Belt land. Nor the Spatial Growth Options (SGO), which have, at Reg 19 stage, including areas of Green Belt (Medway Valley and North of Strood) within the preferred spatial option.

- 2.8 As per our response to Matter 2, we consider there is a lack of clarity around how the 'package' of sites which form the SGO have been chosen. The inclusion of Green Belt sites when there remain other non-Green Belt suitable opportunities which were included in the 'Dispersed Growth' option has not been justified.
- 2.9 The Council has therefore not fully considered all other reasonable options on non-Green Belt land for meeting its identified need for development before considering Green Belt release.
- 2.10 We therefore do not consider there to be exceptional circumstances which warrant the release of Green Belt on this occasion. Other non-Green Belt opportunities, such as Land south of Higham Road and east of Buckland Road, Cliffe, should be revaluated and, ultimately, allocated through modification to the Plan.

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

- 2.11 No, as set out above we do not consider there are exceptional circumstances which have demonstrated Green Belt land should be released in this instance. As such, Policy S7 is not positively prepared, justified or consistent with national policy.
- 2.12 Policy S7 should be removed (noting that national planning policy provides the appropriate policy mechanism for protecting the Green Belt) and the policies map be updated accordingly.