

**HEARING STATEMENT
MATTER 5: GREEN BELT**

HALLAM LAND (ID: E157, E.20)

(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.

- 1.1 The Green Belt boundaries defined by Policy S7 will not endure beyond the plan period.
- 1.2 As set out in our response to Matter 3, there is very limited contingency in the Council's housing supply, all of which will be eroded once the plan period is appropriately defined. This lack of resilience is likely to result in under-supply during the Local Plan period, primarily due to delayed or undeliverable strategic allocations. This creates pressure for the release of further sites within the plan period.
- 1.3 As our representations and other Hearing Statements set out, other well-performing sites fall within the Green Belt. If, on the evidence, those sites are identified as necessary for contingency or additional allocations, the currently defined boundaries will require amendment. Consideration must therefore be given to 'safeguarding' (or other identification) of sites which may require future Green Belt release, to allow those revised, and enduring boundaries (and which are capable of responding to the Plan's delivery challenges), to be set out in the Plan at the point of adoption.

(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?; and

(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?

- 1.4 Questions Q5.10 and Q5.11 are taken together.
- 1.5 The evidence demonstrates that there is no consistency in the methodologies applied between the two authorities. Firstly, the Council has not provided evidence of an agreed position with Gravesham Borough Council (GBC). The two authorities find different levels of harm, with GBC concluding that the release of the majority of land at Chapter Farm (GB parcel TC2) will result in 'high' levels of harm to the Green Belt, while Medway's Green Belt Review (B8) assesses the adjoining land (GB parcels 2 and 3) as only making a 'moderate' contribution to the Green Belt.
- 1.6 We also consider that it is unsound to rely on an exceptional circumstances case that has not yet been established. GBC is materially less advanced in its emerging plan-making process and is yet to establish exceptional circumstances for Land west of Strood. Our

Regulation 22 representations (MLP/ED16A, E.20, Green Belt) also highlight other inconsistencies in the Council's approach, such as stating that Chapter Farm is "*the most sustainable option to meet Gravesham's development needs*" (MLP/ED7) when GBC's Sustainability Appraisal has not yet been published.

- 1.7 We have significant concerns regarding the prematurity of the proposed Strood release well in advance of GBC's Plan. The Submission Local Plan (A1) allocates the site for 1,280 homes. It is neither justified nor effective for the development strategy to rely on an untested release for such a substantial portion of its supply.

(Q5.13) Why do potential traffic congestion issues in itself lead to not releasing Green Belt land in the Medway Valley and why does the Council rely on the Transport Assessment for the Lower Thames Crossing in this regard (as set out in the Green Belt Note (MLP/ED7) (page 7), rather than the transport assessment work for the Local Plan?

- 1.8 Reference to the Lower Thames Crossing in relation to Green Belt matters is irrelevant and should be disregarded in relation to MLP/ED7.
- 1.9 Whilst we anticipate that Matter 9 will allow discussion regarding transport evidence, given the Inspectors' question, we further note that, notwithstanding its irrelevance in this context, the Council's reliance on the LTC Transport Assessment is inappropriate given that it is a misapplication of that work, prepared in one context (to assess the impacts of that proposal) but applied in another (Local Plan preparation). National policy requires evidence to be "relevant and up-to-date" and "focussed on supporting and justifying the policies concerned" – reliance on the LTC modelling over the Council's own work is inappropriate in that context.
- 1.10 In any event, our Regulation 19 representations (E157, DHA Transport Technical Note) demonstrates that the Council's own Transport Assessment Forecast Report (C2.16.1) finds the A228 Peter's Bridge Roundabout (which would provide access to the Holborough Quarry site) has sufficient capacity to accommodate flows in all scenarios, including when the effects of the Lower Thames Crossing are modelled. Tonbridge and Malling Council's ('TMBC') Local Plan transport evidence (prepared by Kent County Council Highways and incorporating the predicted effects of the Lower Thames Crossing) demonstrates that highway impacts do not preclude the proposed allocation of 1,300 homes at Holborough Quarry within the emerging TMBC Local Plan. In the above context, the reference to the Lower Thames Crossing having a constraining impact on the Medway Valley is wrong, as well as being inappropriately referenced under Green Belt matters.

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

- 1.11 On current evidence, Policy S7 is not positively prepared, justified, effective or consistent with national policy: it relies on an exceptional circumstances case that Gravesham is yet to establish. The Council's 'harm' methodology is also inconsistent with the neighbouring authority it relies on for the release of Land west of Strood.

- 1.12 The Council has also not engaged with Tonbridge and Malling Borough Council (TMBC), which is further ahead in its Local Plan process than Gravesham, in the same manner as GBC. This is not only inconsistent, but also means that Medway's Plan has not adapted to a highly relevant change in circumstances – namely the allocation of land immediately adjoining the authority boundary (at Holborough Quarry) and which has been justified in evidence by that adjoining authority, including through detailed Green Belt assessment.
- 1.13 Our Regulation 19 representations and supporting evidence (E157, File G, Medway Green Belt and Landscape Character Assessment Review, DJA) demonstrates that Medway Council's appraisal of the Holborough Quarry site is flawed. Whilst we assume that site-specific considerations will be raised in the Phase 2 Hearings (including in relation to objection sites), the Council's erroneous conclusion in relation to the Holborough Quarry site, coupled with its failure to consistently consider cross-boundary Green Belt issues (as we note above), undermines the credibility of Policy S7 both in terms of its presumptions in relation to Gravesham and its omissions in relation to Tonbridge and Malling.