

Medway Local Plan Examination

Matter 5 Hearing Statement on behalf of Richborough

Issue - 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.

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?

- 1.1 Richborough does not consider the proposed amendment to Green Belt boundaries to be justified, consistent with national policy or positively prepared.
- 1.2 Paragraph 4.12.4 seeks to demonstrate exceptional circumstances for the release of land from the Green Belt to accommodate development west of Strood (Policy SA6) as part of a cross-boundary development with Gravesham Borough Council (GBC).
- 1.3 The NPPF states that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Whilst the Green Belt is not an environmental designation, it is a strategic planning tool which was introduced to manage the growth of urban areas. It is therefore wholly appropriate to revisit Green Belt boundaries when development requirements justify this.
- 1.4 However, Richborough do not consider it necessary for an authority such as Medway, with only 5% of its land as Green Belt, to propose the removal of Green Belt or grey belt parcels for residential development.
- 1.5 Paragraphs 147 and 148 of the NPPF provides the following guidance for authorities wanting to evidence exceptional circumstances for Green Belt changes:

“147. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

148. Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary." [our emphasis added]

- 1.6 National guidance is clear that strategic policies should look to include brownfield and underutilised greenfield sites before turning to grey belt and Green Belt land for future development. There is insufficient evidence to show that this approach to plan making has been undertaken. Richborough considers there to be sufficient land outside the Green Belt in Medway, on brownfield and greenfield land, to meet housing needs. Richborough do not consider that exceptional circumstances exist to justify Green Belt loss when other suitable sites are available.
- 1.7 Whilst the principle of a cross-boundary development with GBC may well be acceptable, there is no wider justification for why this parcel of land is required, given Medway has only a small area of Green Belt, and the uncertainties in respect of the GBC emerging Local Plan.

Gravesham Local Plan

- 1.8 Richborough has been involved with the plan-making process in GBC since the initial Regulation 18 consultation stage in 2018. Richborough has significant concerns with regards to the likely timescales of the GBC emerging Local Plan. The Northfleet Harbourside Broad Location (Policy LP2B) is a mixed-use draft allocation which anticipates the delivery of 3,500 dwellings in the plan period, and an application for an equivalent mix of uses was submitted to GBC in 2022. The application was called-in by the Secretary of State (SoS) and dismissed in July 2026, noting issues in respect of job losses, health risks due to pollution, impacts on existing businesses both on site and nearby, as well as the loss of a safeguarded minerals wharf¹.
- 1.9 It is considered that several of these matters go to the heart of the principle of development and it is difficult to conceive how development of any significant scale can be accommodated on this site, which overcomes the points raised by the SoS. There can be little certainty that the site will deliver as intended within the next plan period and is therefore likely to be removed as a draft allocation. This would leave the housing trajectory for the GBC Local Plan in a precarious position. The claimed supply in the GBC SHLAA over the plan period (2025-2042) (including Northfleet Harbourside Broad Location) is 13,782 dwellings, which, if delivered, would exceed the Local Plan housing requirement (calculated using the Standard Method) by 2,290 dwellings (which equates to a buffer of almost 20%).
- 1.10 The removal of the Northfleet Harbourside Broad Location would turn this into a deficit of 1,210 dwellings, assuming that all other allocations are deemed to be sound, the majority of which are located in the Green Belt. Given that the deadline for the submission of old-style Local Plans is the end of 2026, it is difficult to envisage how GBC can identify new sites and undertake consultation

¹ Appeal Ref: APP/K2230/V/25/3360355

whilst still ensuring that the timeline is met. There is therefore the potential that GBC will abandon the current Local Plan and instead progress a new-style 30-month Local Plan, which would not be adopted until late 2029/early 2030. There is a clear risk that any exceptional circumstances to justify the release of land west of Strood (SA6) will not exist.

- 1.11 As noted in the MIQ, this is acknowledged by Medway on page 9 of MLP/ED7 (Medway Council's Response to the Inspectors' Initial Queries Letter - Green Belt Note), which states 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"*.

Assessment of Parcels

- 1.12 Medway produced the Green Belt Exceptional Circumstances Topic Paper (Examination Doc Ref: B22.4) in December 2025. This notes the findings of the Green Belt Review (GBR) (Examination Doc Ref: B8) which suggests that Parcels 1, 2, 3 and 4 comprise grey belt, using the definition within the Glossary of the 2024 NPPF.
- 1.13 Richborough strongly disagrees with these conclusions, particularly in regard to Parcel 2. It is clear that the parcel is contained by development on only two sides, with the western corner protruding into the Green Belt. The parcel lacks physical features on the northern and western sides that could restrict and contain development, which would result in an incongruous pattern of development, particularly if the GBC Local Plan does not progress. Richborough considers that this parcel contributes strongly to Purpose A of the Green Belt, meaning the Parcel 2 cannot comprise grey belt.
- 1.14 In respect of Parcels 1, 3 and 4, the GBR assesses the Purpose A contribution to be "moderate". However, Parcels 5 and 6 are judged to be "strong". The assessment for Parcel 6 against Purpose A includes the following comments:

"The site is near to the built up area of Strood and is part of a group of parcels (together with parcels 1-5 and Green Belt in Gravesham) that directly contribute to preventing sprawl further into the Green Belt and across to Gravesham."

Parcel 6 is separated from identified parcels south adjacent by a physical man-made feature, i.e. the A289, which provides a strong physical boundary to contain development on one side. There are no strong or physical defensible barriers/boundaries to the north or west that would be able to contain development."

If parcel 6 were to be developed, it would result in an incongruous pattern of development into the Green Belt in Gravesham and would not have any physical features to the west that could constrain development."

- 1.15 Richborough is of the view that this assessment sits at odds with the assessments for Parcels 1-4 and there is a lack of consistency in how the judgments have been applied. As noted above, it is clear that Parcel 2 also has no strong or physical defensible barriers/boundaries to the north or west that would be able to contain development. It is also acknowledged in the assessment of Parcel 6 that all six parcels contribute to preventing sprawl into Gravesham and yet this point does not seem to have been factored into the assessment of Parcels 1-4 in the same way.
- 1.16 Richborough objects to the way that Parcels 1-4 have been assessed and is of the view that they comprise Green Belt rather than grey belt, in the context of Paragraph 148 of the NPPF.

1.17 In any case, Medway have confirmed the following on Page 9 of MLP/ED7:

“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.”

1.18 In light of the uncertainty around the GBC Local Plan; the lack of exceptional circumstances to justify release of Land West of Strood; and the conclusion that elements of the site do not comprise grey belt, the allocation should be removed from the Plan.

1.19 To ensure there is greater flexibility within the emerging Local Plan land supply, Richborough considers it appropriate to identify additional sites as allocations.

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