

Medway Local Plan – Examination in Public

Hearing Statement: Matter 5 – Green Belt

August 2026

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Document History

Issue	Date	Issued by	Comment
1.0	25/08/26	AW	Draft for client review
2.0	26/08/26	AW	Final issue

1. Introduction

- 1.1 This Hearing Statement has been prepared by Savills on behalf of the Church Commissioners for England (the Commissioners) in response to Matter 5 of the Inspectors' Matters, Issues and Questions for the examination of the Medway Local Plan 2041 (the Plan).
- 1.2 Chapter Farm is owned and promoted by the Commissioners. Chapter Farm lies within Gravesham Borough but immediately adjoins Land West of Strood and forms the principal component of the wider cross-boundary growth location identified through Policy SA6 of the Medway Local Plan and Policy LP6 of the Gravesham Proposed Submission Local Plan. Its planning status, availability and deliverability are therefore directly relevant to Medway Council's exceptional circumstances case for releasing Green Belt land west of Strood.
- 1.3 The Commissioners supports the principle of planning Chapter Farm and Land West of Strood as a coordinated cross-boundary growth location. Its consultant team has participated on its behalf throughout the preparation of both Local Plans, including through representations submitted at the relevant formal consultation stages. That work has included collaborative engagement with Medway Council, Gravesham Borough Council, adjoining landowners and promoters, and their respective consultant teams on the strategic masterplanning, infrastructure, movement and delivery considerations affecting the wider location.
- 1.4 Substantial technical and masterplanning work has been undertaken on behalf of the Commissioners to demonstrate the capacity and deliverability of Chapter Farm, and the site is being actively progressed. Most recently, the Commissioners submitted representations supporting the principle of Chapter Farm's allocation through Policy LP6 of the Gravesham Proposed Submission Local Plan, while seeking targeted changes to ensure that the allocation can be delivered effectively.
- 1.5 This statement focuses on matters within the Commissioners' direct knowledge and interest, particularly the current planning status, availability and deliverability of Chapter Farm and the contribution it makes to the exceptional circumstances for releasing Land West of Strood. It addresses MIQs 5.11 and 5.12.

2. Response to the Inspectors' Questions

MIQ 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 In the Commissioners' view, the difference between the respective Local Plan timetables does not give rise to a clear risk that the exceptional circumstances for releasing Land West of Strood will not be demonstrated. There remains some procedural uncertainty because the Gravesham Local Plan is less advanced, but the position should be assessed against the substantive progress made by Gravesham Borough Council (GBC) and the evidence concerning the availability and deliverability of Chapter Farm.
- 2.2 GBC published its Proposed Submission Local Plan 2042 on 17 April 2026 and the Regulation 19 consultation concluded on 18 August 2026. Policy LP6 proposes to allocate approximately 103 hectares at Strood West, Land at Chapter Farm, providing for at least 1,910 homes at Chapter Farm during the plan period. Chapter Farm therefore forms an important component of Gravesham Borough Council's proposed spatial strategy.
- 2.3 The Commissioners strongly supports the principle of Policy LP6. Its Regulation 19 representations seek targeted changes to ensure that the policy is effective and deliverable but do not question the principle of allocating Chapter Farm. The Commissioners' land forms the largest site in single ownership within the allocation. Substantial technical, infrastructure and masterplanning work has been undertaken, and the land is being actively progressed for development. There is therefore no landowner availability impediment affecting the principal part of Chapter Farm.
- 2.4 This provides considerable assurance that the Gravesham component of the cross-boundary growth location is capable of coming forward. The proposed allocation is supported both by GBC through its Proposed Submission Local Plan and by the principal landowner responsible for its delivery.
- 2.5 The Commissioners recognises that Chapter Farm will not be formally released from the Green Belt until the Gravesham Local Plan is adopted and that Policy LP6 remains subject to examination. That procedural position should not, however, be equated with evidence that the allocation is unlikely to proceed. The current position is clearly positive and materially more advanced than it was when the Medway Local Plan was prepared for submission.
- 2.6 It is understood that Medway Council and GBC are continuing to work together in relation to the cross-boundary growth location, including through the preparation of a Statement of Common Ground. Although that document has not yet been made available to the Commissioners, its preparation is a positive indication of the continuing cooperation between the two authorities and their recognition of the strategic relationship between the adjoining allocations.
- 2.7 Taken together, the Regulation 19 allocation, its importance to Gravesham Borough Council's spatial strategy, the Commissioners' support as principal landowner and the substantial work undertaken provide a credible basis for concluding that Chapter Farm will come forward.

MIQ 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?

- 2.8 The Commissioners would draw the Inspectors' attention to two related, site-specific considerations which materially strengthen the exceptional circumstances for releasing Land West of Strood.
- 2.9 First, MLP/ED7 records that the proposed Chapter Farm allocation extends to approximately 103 hectares and accounts for around 84% of the Green Belt land west of Gravesend Road. The land within Medway represents the substantially smaller remaining component. GBC is now proposing to release and allocate Chapter Farm through Policy LP6 of its Proposed Submission Local Plan.
- 2.10 The Medway land should therefore not be considered as a stand-alone incursion into an otherwise unchanged area of Green Belt. It forms the smaller adjoining part of a much larger cross-boundary growth location which both authorities are proposing to allocate. Its release would enable development, infrastructure, connections and the future Green Belt boundary to be planned coherently across the administrative boundary.
- 2.11 Secondly, the combined location offers identifiable sustainability and infrastructure benefits. Paragraph 4.12.4 of the Submission Local Plan expressly recognises that Land West of Strood is strongly justified by the sustainability of the location when coupled with the proposed development in Gravesham. Chapter Farm is capable of delivering at least 1,910 homes during the plan period, together with a local centre, primary education, employment opportunities, strategic green infrastructure and integrated walking, cycling and public transport connections. When planned with the Medway land, it provides the scale necessary to deliver a coherent and well-supported extension to Strood rather than separate or piecemeal developments.
- 2.12 These are not simply generic benefits associated with housing development. They arise from the particular geography, scale and cross-boundary relationship of Land West of Strood and Chapter Farm. The proposed allocation of Chapter Farm, its promotion by the Commissioners as principal landowner and the technical and masterplanning work already undertaken demonstrate that these benefits are credible and capable of being delivered.
- 2.13 These considerations provide a clear, site-specific reason for releasing the smaller Medway component as part of the comprehensive cross-boundary growth location. They materially strengthen the exceptional circumstances when considered alongside the Council's wider evidence on housing needs, reasonable alternatives and Green Belt performance.

3. Conclusion

- 3.1 The Commissioners supports the release of Land West of Strood from the Green Belt and its comprehensive planning as part of the wider cross-boundary growth location with Chapter Farm.
- 3.2 Since the Medway Local Plan was submitted, Gravesham Borough Council has progressed Chapter Farm as a strategic allocation through its Proposed Submission Local Plan. The Commissioners, as principal landowner, supports that allocation. The continuing technical and masterplanning work being undertaken on its behalf provides strong and current evidence that Chapter Farm is available, actively promoted and capable of delivery.
- 3.3 The difference between the respective Local Plan timetables creates some residual procedural uncertainty, but it does not provide a clear reason to doubt that Chapter Farm will come forward. Conversely, the scale and geography of the proposed Chapter Farm allocation, together with the sustainability and infrastructure benefits arising from coordinated cross-boundary development, materially strengthen Medway Council's exceptional circumstances case.
- 3.4 In the Commissioners' view, exceptional circumstances therefore exist to justify the release of Land West of Strood from the Green Belt. Detailed matters concerning the wording, masterplanning and delivery requirements of Policy SA6 should be considered as part of the Phase 2 examination of the site allocation.

Contact

Andrew Watson
Director

01732789785
07850311337
AJWatson@savills.com

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