

EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

HEARING STATEMENT

THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

MATTER

Matter 5 - Green Belt

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.

Representor	The Independent Group (TIG) on Medway Council
Representor ID	E.37
Relevant MIQs	5.10, 5.11, 5.12, 5.16 and 5.17
Hearing session	22 September 2026 - AM session (9.30 am - 1.00 pm)
Statement date	27 August 2026
Word count	2,528 substantive words

Submitted on behalf of The Independent Group (TIG) on Medway Council
Councillor Michael Pearce, Planning Spokesman

1. PURPOSE AND STATUS OF THIS STATEMENT

- 1.1 This Hearing Statement is submitted by The Independent Group (TIG) in relation to Matter 5 - Green Belt. It addresses only the Inspectors' Matters, Issues and Questions (MIQs) identified below and should be read alongside TIG's Regulation 19 representations listed in section 6.
- 1.2 This statement does not introduce a new, free-standing objection to the Green Belt Review or a new site-specific case. It focuses and clarifies TIG's Regulation 19 concerns about the spatial strategy, reasonable alternatives and the priority that should be given to suitable urban brownfield and underused land.
- 1.3 For avoidance of doubt, TIG's Regulation 19 alternative strategy referred to maximising growth in Strood as part of an 'Urban Core Focus' through vacant brownfield sites, underused land and existing public transport corridors. It did not advocate development of Green Belt greenfield land west of Strood. TIG's Matter 5 concern is therefore whether the Council has demonstrated the exceptional circumstances and soundness necessary for that particular Green Belt release as part of the submitted spatial strategy.

2. TIG'S POSITION AT A GLANCE

Overall answer to the Matter / Issue

- 2.1 TIG considers that Policy S7 has not presently been demonstrated to be justified or effective insofar as it removes Green Belt land west of Strood. MLP/ED7 contains an express and important qualification: the Council 'does not believe that there would be exceptional circumstances' to justify the Medway Council side release if adjoining Green Belt land in the Gravesham Borough Council area were not released. The Gravesham Borough Council element is therefore not merely supportive context; on the Council's own evidence it is a necessary premise of the exceptional-circumstances case.

Soundness / legal test engaged

- 2.2 Justified; effective; consistent with national policy.

Main Modification / action sought

- 2.3 Unless the Inspectors are satisfied, on current and sufficiently certain evidence, that the Chapter Farm release in the Gravesham Borough Council area will form part of the cross-boundary development on which Medway Council's exceptional-circumstances case depends, the west-of-Strood land should remain within the Green Belt and the Policies Map, Policy S7 and Policy SA6 should be amended consequentially. If the resulting redistribution cannot be achieved without materially recasting the submitted spatial strategy, the Plan should be withdrawn and re-prepared.

3. RESPONSES TO THE INSPECTORS' MIQs

- 3.0 The changes identified below are without prejudice to TIG's position at paragraphs 4.2-4.3. TIG does not ask the Inspectors to determine technical Green Belt methodology matters beyond the evidence necessary to answer the soundness questions raised by the Council's own cross-boundary case.

3.1 MIQ 5.10 - What are the differences between the methodologies engaged by Medway Council and Gravesham Borough Council, given that the proposed releases at Land West of Strood and Chapter Farm are adjacent?

TIG's answer: The reviews and supporting evidence have progressed separately. That is material because Medway Council's exceptional-circumstances case is expressly dependent upon what happens to the adjoining Gravesham Borough Council area Green Belt.

Reasoning...

- 3.1.1 MLP/ED7 states that the two Green Belt Reviews were not coordinated through a shared commission. Medway Council and Gravesham Borough Council discussed a shared methodology, but this was not carried forward because of different programmes, the availability of consultants and Medway Council's need to meet its Regulation 19 timetable. Medway Council therefore progressed its review in-house while maintaining engagement with Gravesham Borough Council.
- 3.1.2 The Gravesham Borough Council letter reproduced at Appendix 2 to MLP/ED7, dated 6 May 2026, states that a further Gravesham Borough Council area Green Belt Study was still being prepared and would set out the exceptional circumstances for changes to Gravesham Borough Council's Green Belt boundary. MLP/ED7 subsequently records that Gravesham Borough Council's Regulation 19 draft included Chapter Farm and that a draft 2026 Green Belt Review was underway.
- 3.1.3 TIG does not suggest that different authorities must use identical methodologies. Its narrower point is that where the justification for altering Medway Council's boundary depends upon release of adjoining land, the examination needs a sufficiently coherent and up-to-date evidential basis for the cross-boundary proposition as a whole.

Regulation 19 basis: TIG Main Representation, Chapter 5; E.37 / SDLP 111 and 112.

Change necessary: Require current cross-boundary evidence sufficient to demonstrate the premise on which Medway Council's exceptional-circumstances case depends. If that premise is not sufficiently certain, retain the Medway Council area land in the Green Belt.

3.2 MIQ 5.11 - Is there a clear risk that exceptional circumstances may not be demonstrated, especially as Gravesham is not as advanced in its Local Plan preparation?

TIG's answer: Yes. The risk is clear, material and identified expressly by the Council's own evidence.

Reasoning...

- 3.2.1 MLP/ED7 states in terms that the Council does not believe exceptional circumstances would exist to justify release of land west of Strood if the adjoining Gravesham Borough Council area Green Belt release did not happen. It explains that, in that event, the Medway Council area land would continue to perform its function as part of the larger Green Belt and that this would be the overriding consideration against release.

- 3.2.2 That statement is decisive to the structure of the Council's case. The Chapter Farm release is not simply one benefit among several. If it does not occur, the Council says its own exceptional-circumstances conclusion changes. Policy S7 nevertheless states without qualification that exceptional circumstances have been established and the Policies Map removes the Medway Council area land from the Green Belt.
- 3.2.3 The fact that Gravesham Borough Council's Regulation 19 draft includes Chapter Farm reduces uncertainty but does not eliminate it. MLP/ED7 itself records continuing work on Gravesham Borough Council's Green Belt evidence. The adjoining allocation and boundary change remain part of another authority's emerging plan-making process and are subject to that process reaching a sound outcome.
- 3.2.4 This creates a sequencing problem. If Medway Council's Plan alters its Green Belt boundary before the dependent Gravesham Borough Council area release is sufficiently certain, Medway Council could adopt a boundary change in circumstances which, on the Council's own stated case, would not amount to exceptional circumstances. A Green Belt boundary shown on an adopted Policies Map cannot sensibly depend upon a future event which may or may not occur.

Regulation 19 basis: TIG Main Representation, Chapter 5, particularly sections 5.1-5.3 and 5.9; E.37 / SDLP 111 and 112.

Change necessary: Do not remove the west-of-Strood land from the Green Belt unless the dependent Chapter Farm release is demonstrated with sufficient certainty by the conclusion of the examination. Otherwise retain the existing Green Belt boundary and amend Policy S7, Policy SA6 and the Policies Map accordingly.

3.3 MIQ 5.12 - Are there any other matters relevant to the exceptional circumstances for release of Green Belt land west of Strood?

TIG's answer: The Council identifies relevant factors, but they do not remove the cross-boundary dependency acknowledged in MLP/ED7.

Reasoning...

- 3.3.1 B22.4 relies on the consideration of brownfield and underutilised land, optimisation of density, the claimed sustainability of the Strood West location, alignment with the spatial strategy and the opportunity to deliver a comprehensive cross-boundary community. These are matters capable of informing the exceptional-circumstances judgment.
- 3.3.2 However, MLP/ED7 demonstrates that the Council does not regard those factors as sufficient in isolation. Having considered those matters, the Council still concludes that exceptional circumstances would not exist if the Gravesham Borough Council area release did not happen. The exceptional-circumstances case must therefore be assessed as the conditional, cross-boundary case which the Council itself has advanced.
- 3.3.3 TIG's Regulation 19 case is also relevant to the first stage of that reasoning. Chapter 5 of TIG's Main Representation proposed a vacant-brownfield-first approach, with Strood identified as an urban core location for intensification on vacant brownfield and underused land. A3.2 confirms that an Urban Regeneration Focus was assessed, but also records that engagement with Gravesham Borough Council led to reconsideration of three Green Belt sites west of Strood late in the development of the final site package.

- 3.3.4 TIG does not repeat its Matter 2 case here. The Matter 5 point is narrower: before permanent Green Belt boundaries are altered, the evidence should demonstrate both that other reasonable options have been fully examined and that the particular cross-boundary factual circumstances relied upon actually provide a sufficiently firm basis for release.

Regulation 19 basis: TIG Main Representation, Chapter 5 and Chapter 7; E.37 / SDLP 111 and 112.

Change necessary: Reconcile the exceptional-circumstances reasoning with the Council's express dependency on Chapter Farm and demonstrate that the necessary cross-boundary circumstances exist with sufficient certainty. If not, retain the land in the Green Belt.

3.4 MIQ 5.16 - Is Policy S7 based on robust and up-to-date evidence?

TIG's answer: Not fully demonstrated in relation to the west-of-Strood release.

Reasoning...

- 3.4.1 The evidence base has developed materially. B8 was published in June 2025 and B22.4 in December 2025. MLP/ED7, dated May 2026, then provides important clarification which is not merely descriptive: it states that exceptional circumstances do not exist without the adjoining Gravesham Borough Council area release; confirms that the two Green Belt Reviews were not coordinated through a shared commission; and identifies amendments required to Table 1 of B22.4 for consistency.
- 3.4.2 MLP/ED10 subsequently supplied the external critique of the draft Green Belt Review and confirmed continuing collaboration with Gravesham Borough Council on the cross-border allocation. The Council's response to the supporting-evidence consultation in MLP/ED16C states that its Green Belt position remains unchanged and refers back to MLP/ED7.
- 3.4.3 The difficulty is therefore not that there is no evidence. It is that the submitted policy wording and map present the exceptional-circumstances conclusion as settled and unconditional, while the Council's latest examination explanation makes the decisive justification conditional upon another authority's release. That qualification should be resolved, not left implicit.
- 3.4.4 Policy S7 should be assessed against the evidence as it now stands at examination. If the Chapter Farm element has become sufficiently certain, the Council should demonstrate that with current evidence. If it has not, the evidential basis for permanently altering Medway Council's Green Belt boundary is incomplete on the Council's own reasoning.

Regulation 19 basis: TIG Main Representation, Chapters 5 and 7; E.37 / SDLP 111 and 112.

Change necessary: Require a consolidated and up-to-date evidential position on the cross-boundary release before finding Policy S7 sound. In the absence of sufficient certainty, delete the west-of-Strood Green Belt release.

3.5 MIQ 5.17 - Is Policy S7 positively prepared, justified, effective and consistent with national policy?

TIG's answer: Not presently, insofar as it provides for the Green Belt release west of Strood.

Reasoning...

- 3.5.1 Justified: the submitted boundary change has not yet been shown to be an appropriate outcome if a necessary factual premise - release of Chapter Farm - remains uncertain. The Council's own evidence says the exceptional-circumstances conclusion would be different without it.
- 3.5.2 Effective: Policy SA6 is expressly framed as a comprehensive cross-border location 'together with Chapter Farm'. If Chapter Farm does not proceed, the policy's stated spatial concept, infrastructure rationale and relationship with the remaining Green Belt would materially change. The Plan should not rely on an allocation whose justification depends upon an external component that is not sufficiently certain.
- 3.5.3 Consistent with national policy: permanent alteration of Green Belt boundaries through plan-making requires exceptional circumstances to be fully evidenced and justified. On the Council's own case, those circumstances are conditional upon the adjoining release. If that condition is not established, the Medway release should not occur.
- 3.5.4 TIG recognises that coordinated cross-boundary planning can be positively prepared. Its objection is not to cooperation between Medway Council and Gravesham Borough Council, nor to suitable urban brownfield development in Strood. It is to treating the Green Belt release as an unconditional component of the submitted Plan when the Council's examination evidence makes its justification conditional.

Regulation 19 basis: TIG Main Representation, Chapter 5; E.37 / SDLP 111 and 112.

Change necessary: Amend Policy S7 and the Policies Map as set out below. Make consequential changes to Policy SA6 and the housing/spatial strategy. If the necessary redistribution fundamentally recasts the submitted strategy, the Plan should be withdrawn and re-prepared.

4. OVERALL CONCLUSION ON THIS MATTER

- 4.1 TIG's Matter 5 case is deliberately narrow. It does not seek to substitute a new technical Green Belt Review for the Council's evidence. The central point arises from MLP/ED7 itself: Medway Council says exceptional circumstances for release west of Strood would not exist if the adjoining Gravesham Borough Council area Green Belt release did not happen.
- 4.2 TIG therefore considers that the Plan cannot presently be found justified or effective in relation to that release unless the Inspectors are satisfied that the dependent Chapter Farm element is sufficiently certain and that the cross-boundary exceptional-circumstances case is supported by current, coherent evidence. If that can be demonstrated through limited examination work and Main Modifications, TIG accepts that route may be available.
- 4.3 If it cannot be demonstrated, the Medway Council area land west of Strood should remain in the Green Belt, with consequential deletion or amendment of Policy SA6 and redistribution of any affected housing requirement. If those consequences cannot be

accommodated without materially recasting the submitted spatial strategy, the Plan should not be adopted and should be withdrawn and re-prepared.

5. MAIN MODIFICATIONS / CHANGES SOUGHT

- 5.1 These changes are without prejudice to TIG's position at paragraphs 4.2-4.3 and apply only if the defects can be remedied without materially recasting the submitted Plan. For the purposes of this table, "EX" denotes an examination action sought rather than proposed Main Modification wording.

Ref	Plan policy / text	Defect identified	Modification / change sought	Why necessary
MM-TIG-M5-01	Policy S7 and Policies Map	The submitted Plan removes Green Belt land west of Strood unconditionally, while MLP/ED7 states that exceptional circumstances would not exist if the adjoining Gravesham Borough Council area Green Belt release did not happen.	Unless the Inspectors are satisfied that the Chapter Farm release is sufficiently certain and the cross-boundary exceptional-circumstances case is robust, retain the existing Green Belt boundary and delete the corresponding west-of-Strood release from Policy S7 and the Policies Map. If retained, amend the supporting text so the evidential basis and dependency are stated accurately.	Necessary for the release to be justified, effective and consistent with national policy.
MM-TIG-M5-02	Policy SA6; paragraphs 14.7.1-14.7.6; housing trajectory	Policy SA6 is expressly conceived as a comprehensive cross-border location together with Chapter Farm. Its justification and delivery assumptions would materially change if the Gravesham Borough Council area element did not proceed.	If MM-TIG-M5-01 results in retention of the Green Belt, delete the affected Medway Green Belt component of Policy SA6 and its dwelling contribution, with consequential redistribution through the spatial strategy. If the allocation is retained, ensure the policy, phasing and trajectory reflect the cross-boundary dependency and require coordinated implementation.	Necessary for the allocation and housing strategy to be justified and effective.
EX-TIG-M5-03	B8, B22.4 and cross-boundary Green Belt evidence	The examination evidence materially qualifies the submitted exceptional-circumstances case, identifies amendments to B22.4 and confirms that the two authorities' Green	Require a consolidated, up-to-date evidential position confirming the current Gravesham Borough Council position, the status of Chapter Farm, and why the cross-boundary	Necessary to determine soundness on a robust and current evidence base.

		Belt work progressed separately.	exceptional-circumstances conclusion is sufficiently certain. If this cannot be demonstrated, apply MM-TIG-M5-01 and 02.	
--	--	----------------------------------	--	--

6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

Reference	Document	Where relevant
TIG Reg 19 E.37 / SDLP 111-112	TIG Main Representation	Chapter 5 (urban/brownfield-first alternative strategy) and Chapter 7 (reasonable alternatives / SA).
A1	Submission Medway Council Local Plan 2041	Paras 4.12.3-4.12.10; Policy S7; paras 14.7.1-14.7.6; Policy SA6.
A3.2	Sustainability Appraisal - Volume 2 of 3 - Regulation 19 Report	Section 5.5; Tables 5.5-5.6; Council comment on final site selection, pp.31-33.
B8	Green Belt Review	Sections 2.3, 2.7-2.8; assessments of parcels 2-4.
B22.4	Green Belt Exceptional Circumstances Topic Paper	Sections 3.1-3.4 and 5.1.
MLP/ED7	Medway response to Inspectors' Green Belt initial questions	Cross-boundary coordination and exceptional circumstances, particularly pp.8-10; Appendix 2.
MLP/ED10	Council's response to the Inspectors' next steps	Green Belt update; Appendices A1-A2 external critique.
MLP/ED15	Phase 1 Matters, Issues and Questions	Matter 5, questions 5.10-5.17.
MLP/ED16C	Council consideration of Supporting Evidence consultation representations	B22.4 / MLP/ED7 responses, pp.24-27.

7. APPENDIX

7.1 No appendix is proposed.

**SUBMITTED ON BEHALF OF THE INDEPENDENT GROUP (TIG)
ON MEDWAY COUNCIL**

Councillor Michael Pearce

Councillor Michael Pearce
Planning Spokesman
27 August 2026

**For the avoidance of any doubt, Councillor Michael Pearce is an Independent Councillor representing Hoo & High Halstow Ward on Medway Council, which is also the Local Planning Authority (LPA). He serves as the Leader and Planning Spokesman for The Independent Group (TIG) on Medway Council - an unwhipped group of Independent councillors representing the Hoo Peninsula (Strood Rural Ward, Hoo & High Halstow Ward, All Saints Ward), formed for administrative purposes and committee entitlement. While Councillor Pearce is a Medway Councillor and member of the LPA's Planning Committee, he does not speak or act on behalf of Medway Council or the LPA, either generally or at formal planning inquiries.*