

Hearing Statement

Matter 5 – Green Belt

Issues

- 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.

Questions

Policy S7: Green Belt

- 5.1 Have the proposed Green Belt boundaries under Policy S7 been defined clearly, using physical features that are readily recognisable and likely to be permanent, following on from the Green Belt Review (B8)?
- 5.5.1 Yes, the Green Belt boundaries as set out on the Policies map and managed through Policy S7 have been defined using identifiable and permanent physical features, consistent with national policy and informed directly by the Green Belt Review (B8). In the first instance, the Review's methodology states that assessment parcels were delineated using “*well defined physical features*” and “*distinct and permanent edges*”, with a preference for strong boundaries such as roads, railway lines, ridgelines, woodland belts, water bodies and established settlement edges. The assessment also notes that stronger boundaries are necessary to ensure the long-term permanence of the Green Belt (pages 9-11).
- 5.5.2 The Council subsequently carried forward the Green Belt Review recommendations into Policy S7, confirming the release of grey belt parcels 1, 2, 3, 4, 9 and 12 and correcting boundary anomalies where existing boundaries did not coincide with strong physical features. The Green Belt Exceptional Circumstances Topic Paper (B22.4) confirms that amendments were made to align boundaries with features such as Dillywood Lane, the B2000, the M2 corridor, roads, railway infrastructure and nature reserve boundaries, specifically to create stronger and more readily recognisable Green Belt edges (Section 4.2, pages 7-8; section 5, paragraphs 5.1.8, page 9).
- 5.2 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?

5.2.1 Yes. The Council is satisfied that the Green Belt boundaries under Policy S7 are capable of enduring beyond the Plan period and should not require further review. The Council holds this view because the Green Belt Review (B8) was undertaken with particular regard to the Green Belt's essential characteristics of openness and *permanence* and sought to define boundaries using strong, readily recognisable and permanent physical features, including roads, railway lines, ridgelines, woodland belts and established settlement edges (pages 9-11).

5.2.2 All Green Belt parcels were assessed against the five Green Belt purposes, with only a limited number identified for release or amendment (B8, pages. 17-77). The Council subsequently carried forward those recommendations and corrected boundary anomalies where existing boundaries did not align with strong physical features, ensuring compliance with national policy and creating robust, defensible Green Belt boundaries (Green Belt Exceptional Circumstances Topic Paper (B22.4), pages 7-9). Therefore, the evidence indicates that the boundaries proposed through Policy S7 are intended to remain permanent well beyond 2041.

5.3 Is Policy S7 (first paragraph) consistent with national policy on Green Belt where it refers to the coalescence of settlements?

5.3.1 No, the first paragraph of Policy S7 states that the Green Belt performs an important role in managing against "*urban sprawl and coalescence of settlements*". However, the Framework, at paragraph 143(b), identifies one of the five purposes of the Green Belt as being "*to prevent neighbouring towns merging into one another*" rather than preventing the coalescence of all settlements. Therefore, the Council accepts that a modification to the policy may be required, and respectfully suggests the following:

"The Council recognises the important function of Green Belt at a local and strategic scale, in managing against urban sprawl, preventing neighbouring towns from merging into one another, ~~and coalescence of settlements~~ and maintaining the openness and permanence of the countryside within the designation..."

5.4 Is Policy S7 (third paragraph) consistent with national policy where it states there will not be inappropriate development in the Green Belt?

5.4.1 No. The Framework, at paragraph 153 states that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." Similarly, the Framework identifies a range of forms of development that are not inappropriate in the Green Belt, provided they meet the relevant criteria. Therefore, the Council accepts that a modification to the policy may be required, and respectfully suggests the following:

“There will not be inappropriate development in the Green Belt except where very special circumstances are demonstrated in accordance with national policy.”

5.5 Why does the Green Belt Note (MLP/ED7) (page 7) indicate that Green Belt land releases concern only parcels of land associated with the land west of Strood allocation, when the Appendix 1 to that note indicates a number of other Green Belt releases?

5.5.1 The statement in MLP/ED7 (page 7) that Green Belt releases concern only land associated with the west of Strood allocation should be read alongside the decision-making process set out in Appendix 1. The purpose of Appendix 1 is to provide a transparent record of all Grey Belt parcels identified through the Green Belt Review (B8) and to distinguish between parcels identified as Grey Belt and those ultimately carried forward for release as part of the Local Plan strategy.

5.5.2 The Green Belt Review identified eight parcels as Grey Belt. However, the Council's subsequent decision-making considered the priorities in NPPF paragraph 148, housing needs, sustainable patterns of growth, the cross-boundary implications of the Gravesham allocation at Chapter Farm, and the Local Plan site selection and Sustainability Appraisal processes. Following that assessment, only parcels 1, 2, 3 and 4 were identified for release, all forming part of the cross-boundary west of Strood allocation (Policy SA6). Parcels 9, 12, 13 and 17 were identified as Grey Belt but were not considered necessary or preferable to release in support of the Local Plan strategy and therefore remain within the Green Belt.

5.5.3 Appendix 1 therefore does not indicate additional Green Belt releases. Rather, it distinguishes between parcels identified as Grey Belt and those carried forward for release. Table 1 confirms that only parcels 1, 2, 3 and 4 are proposed for release, whereas parcels 9, 12, 13 and 17 are explicitly shown as "No" in the "Carried forward for release from Green Belt boundary" column and "No change to Green Belt Boundary" in the "Policy map changes" column.

5.5.4 To avoid any ambiguity, the Council has updated Appendix 1 of MLP/ED7 which can be seen at Appendix 1 of this document. The Appendix has been amended to better reflect the decision-making process. In particular:

- Appendix 1 is retitled as: *"Green Belt Review Findings and Decision-Making"*
- Table 1 is retitled as: *"Identification of Grey Belt for Release"*
- The heading *"Reasons"* is amended to *"Decision-making"*.
- The column *"Carried forward for release from Green Belt boundary"* is moved so that it immediately precedes the *"Policy map changes"* column.

- 5.5.5 These amendments make clearer that Appendix 1 records both the identification of Grey Belt parcels and the subsequent decision-making process, and that only parcels 1, 2, 3 and 4 are released from the Green Belt to implement the Local Plan strategy.
- 5.6 Why was the 2018 Green Belt Review used as the starting point for the Council's Green Belt Review (B8), as stated in the Green Belt Note (MLP/ED7) (page 4), as the approach set out in the National Planning Policy Framework 2024 and the Planning Practice Guidance February 2025 were published after this earlier Green Belt review?
- 5.6.1 The 2018 Green Belt Review was used as the starting point for the Council's Green Belt Review (B8) because it provided the most recent comprehensive assessment of the Green Belt and its contribution to the purposes of Green Belt designation across Medway. The earlier study remained a valuable evidence source, having been underpinned by a robust and detailed landscape-based assessment of Green Belt parcels. Furthermore, there had been no material changes to the extent, character or function of the Green Belt in Medway in the intervening years that would undermine the relevance of its findings.
- 5.6.2 Following the publication of the revised National Planning Policy Framework in December 2024, and before the subsequent Planning Practice Guidance was issued in February 2025, officers reviewed the 2018 methodology to understand how it aligned with the new national requirements and to inform discussions with prospective consultants. That review identified that, while the underlying evidence and parcel assessments remained sound, the methodology required updating to ensure consistency with the revised national policy and emerging guidance. This conclusion was subsequently reinforced by the step-by-step methodology set out in the Planning Practice Guidance, which confirmed the need for a refreshed assessment framework.
- 5.6.3 Accordingly, the Council and its consultants built upon the robust evidence base established by the 2018 review, while updating the methodology to ensure full alignment with current national policy and guidance.
- 5.7 Why is the Green Belt Review (B8) structured differently from the draft version as is set out in the external critique? (MLP/ED10, Appendix A1 and A2)?
- 5.7.1 Advice from the external critique included breaking down parcels further. This had implications for the draft version parcels 2 and 5 and the order these would be presented, i.e. parcel 2 was broken down into 5 parcels and parcel 5 was broken down into 12 parcels.
- 5.7.2 The reordering of parcels 1 and 2 of the draft version, made it easier to illustrate the impact of the urbanising influence of Strood.

- 5.7.3 The assessment template used for each parcel was reviewed to include Purposes C and E, which was included within the draft version at section 3.7.1. but not incorporated into the assessment template at the point of sharing the draft for the external critique.
- 5.8 Were any of the changes that the external critique (MLP/ED10, Appendix A1 and A2) recommended not taken up in the Green Belt Review (B8) and if so, why?
- 5.8.1 No. All advice points and text suggestions were taken on board in the production of the Green Belt Review (B8).
- 5.9 Is how the Green Belt Review (B8) deals with villages under Green Belt Purpose B consistent with national policy, as this was a matter raised in the external critique (MLP/ED10, Appendix A1 and A2)?
- 5.9.1 Yes. Particular articulation in the assessment of parcel 5, where the village of Cuxton was referenced, was influenced by the comments of the external critique. The advice was pointing to the broader context of the expansion of Strood and this contribution toward sprawl.
- 5.10 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.
- 5.10.1 There are differences between the Medway Green Belt Review (2025) and Gravesham's earlier 2018 Green Belt Study, the comparison is more nuanced when Gravesham's subsequent Stage 2 Green Belt Study (2020) is taken into account. Gravesham moved beyond the strategic 26-parcel assessment undertaken in 2018 and commissioned a finer-grained assessment comprising 122 parcels and sub-parcels, which considered the contribution of land to Green Belt purposes, the impact of release on adjoining Green Belt land and overall levels of Green Belt harm.
- 5.10.2 However, Medway's review remains distinct because it has been prepared in the context of the December 2024 NPPF and February 2025 Planning Practice Guidance on Grey Belt, including specific consideration of Grey Belt identification, Footnote 7 constraints and whether release would fundamentally undermine the remaining Green Belt across the plan area. These tests did not form part of Gravesham's 2020 methodology.
- 5.10.3 Consequently, although Land West of Strood and Chapter Farm are adjoining sites within the same strategic Gravesend-Strood gap, the two authorities' conclusions derive from different policy frameworks and assessment methodologies. Gravesham's approach focused on the degree of harm arising from release, whereas Medway's review additionally assesses Grey Belt status

and the wider effects on the remaining Green Belt under the current national policy framework. Notwithstanding these methodological differences, the overlap between the two authorities' assessments provides a clear example of corroborative analysis. The fact that two independently prepared reviews, applying different methodologies and policy tests, reached materially similar conclusions regarding the strategic importance and function of this part of the Green Belt lends confidence to the robustness of the evidence base. It also demonstrates that the professional judgement exercised by the respective assessors was sound, with consistent conclusions emerging from different analytical approaches and policy contexts.

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?

5.11.1 No. The Council has confidence that exceptional circumstances will be demonstrated and that the release of land west of Strood remains justified. Whilst the Council acknowledged in the Green Belt Note (MLP/ED7) that the justification for releasing Medway's land is intrinsically linked to the release of adjoining land at Chapter Farm, the evidence indicates that Gravesham Borough Council remains committed to a strategy which necessarily includes Green Belt release. The Council has been clear that Gravesham has thoroughly explored opportunities within its urban area and concluded that these are insufficient to meet its development needs, leading to the ongoing review and proposed release of Green Belt land. Gravesham has also formally confirmed its support for the cross-boundary allocation and the role of Chapter Farm in meeting its housing requirements.

5.11.2 Furthermore, the release of land west of Strood represents the most sustainable and logical location for growth when considered across the two authorities. The evidence demonstrates that the Green Belt parcels forming the cross-boundary allocation are the most suitable and preferable areas identified through the assessment process, performing better than alternative grey belt options and enabling the delivery of a comprehensively planned sustainable community with supporting infrastructure and sustainable transport opportunities.

5.11.3 Noting that:

- The Council considers land west of Strood, together with Chapter Farm, to be the most appropriate and sustainable Green Belt release option, having been

identified as the preferred location through the Green Belt Review (B8), Sustainability Appraisal and consideration of reasonable alternatives.

- Alternative grey belt parcels were not taken forward due to landscape, environmental, infrastructure, delivery or sustainability constraints.
- The cross-boundary allocation can deliver a comprehensively planned sustainable urban extension, benefiting from access to the A226, A2 and M2, enhanced public transport, and supporting infrastructure.
- Importantly, both Medway and Gravesham independently identified the same broad location for growth. This convergence provides strong corroborative evidence that it is the optimum and most robust location for release.

5.11.4 The fact that both authorities, through separate Green Belt assessment processes, have identified the same broad location for growth provides strong corroborative evidence of its appropriateness. Different methodologies have led to the same strategic outcome, reinforcing confidence that the allocation is sound, justified and capable of meeting the exceptional circumstances test. Gravesham's recent Regulation 19 consultation further supports the Council's confidence that the cross-boundary strategy will continue to be taken forward.

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?

5.12.1 There are no other matters that the Council would wish to draw your attention to as regards the exceptional circumstances for the release of Green Belt land to the west of Strood.

5.13 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?

5.13.1 First, it is important to note that the Framework at paragraph 148, states:

"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..."

5.13.2 And specifically directs authorities to have regard to paragraphs 110 and 115 on sustainable transport and accessibility.

5.13.3 Paragraph 148 goes on to require authorities to consider the sustainability consequences of directing development towards urban areas within the Green Belt, towards inset settlements, or beyond the outer Green Belt boundary.

5.13.4 This is reinforced elsewhere in the Framework:

- Plan-making should promote a "sustainable pattern of development" that aligns growth and infrastructure and meets development needs.
- Significant development should be focused on locations that are or can be made sustainable, limiting the need to travel and offering a genuine choice of transport modes.

5.13.5 Green Belt boundaries should be consistent with the development plan's strategy for meeting sustainable development requirements.

5.13.6 Accordingly, the Council position is that transport accessibility, infrastructure capacity and the ability of locations to support sustainable travel are material considerations in deciding which Green Belt sites should be released.

5.13.7 Second, and turning to the question of the Lower Thames Crossing (LTC) and its potential effects on the highways network, the Council's approach is justified because the LTC is a nationally significant infrastructure project which will fundamentally alter travel patterns across North Kent and the wider strategic road network. The LTC Transport Assessment represents the most comprehensive and up-to-date assessment of the future operation of that network and specifically examines the cumulative effects of the Crossing on corridors within the Medway Valley. The Council therefore felt it is appropriate, and robust, to have regard to that evidence when considering the suitability and scale of future development in this location.

5.13.8 The Council did not simply conclude that congestion alone prevented Green Belt release. Rather, it exercised a strategic planning judgement that the combination of projected congestion, air quality and noise impacts identified through the LTC assessment indicated that growth within the Medway Valley should be carefully managed and limited to the most sustainable locations. The Green Belt Note (MLP/ED7) explains that that these impacts were "one reason" why growth in the Medway Valley needed to be limited, rather than the sole determining factor.

5.13.9 The Council's use of LTC evidence is further justified because the effects of the Crossing extend beyond administrative boundaries and involve strategic movements on the trunk road network that fall outside the scope of a local plan transport assessment. Whilst Medway's Strategic Transport Assessment (B18) includes sensitivity testing of LTC scenarios (see sections 4.3, 5.4 and 6.6), the LTC Transport Assessment is the primary source of evidence regarding the operation and performance of the strategic network following implementation of that nationally significant project. It is therefore reasonable for the Council to place weight on that evidence when considering the scale and distribution of future growth.

5.14 Is the proposed Green Belt boundary for Parcel 1: Rochester Football Club correct, as it appears to cut across the sports facility as shown in Appendix 1 to the Green Belt Note (MLP/ED7)?

5.14.1 Yes. The Green Belt boundary is shown correctly. The Council's administrative boundary passes through the Rochester Football Club site and associated sports facilities. It is therefore the proposed Green Belt boundary does not follow the physical extent of the sports use. The strategic intention of both authorities (Medway and Gravesham) is that the land on either side of the administrative boundary forms part of a single, comprehensively planned development allocation. In these circumstances, it is appropriate that Medway releases land from the Green Belt up to its administrative boundary. To do otherwise would leave a narrow and anomalous remnant of Green Belt land between the allocation and the authority boundary, serving no meaningful Green Belt purpose and failing to reflect the cross-boundary nature of the proposed development. The proposed boundary therefore provides a logical, defensible and permanent Green Belt edge that aligns with both authorities' emerging Local Plan strategies and supports the delivery of the planned urban extension.

5.14.2 The purpose of the boundary is to reflect the extent of land that is proposed to be removed from the Green Belt as part of the SA6 cross-boundary allocation, rather than the operational extent of Rochester Football Club. Parcel 1 was identified as grey belt land through the Green Belt Review and was carried forward, together with parcels 2, 3 and 4, as the Council's preferred and most sustainable option for release.

5.14.3 The resultant boundary is consistent with the Local Plan strategy and is also reflected in the corresponding cross-boundary allocation promoted through Gravesham Borough Council's evidence base and plan-making process. Gravesham Borough Council's evidence base identifies the adjoining Chapter Farm / Three Crutches Green Belt release through its Stage 2 Green Belt Study, where the site is assessed as parcels TC1, TC2 and TC3. Gravesham's evidence confirms that the Chapter Farm allocation and the Medway parcels were considered through a joint master-planning exercise, and as is set out in MLP/ED7 parcels 1-4 were selected specifically because they form part of a coherent cross-boundary sustainable urban extension.

5.15 Are there any other matters that the Council would wish to draw our attention to as regards the methodology for the Green Belt Review (B8)?

5.15.1 There are no other matters that the Council would wish to draw your attention to as regards the methodology for the Green Belt Review (B8).

5.16 Also having regard to the Council's response to the Inspector's initial questions (MLP/ED6) and the subsequent Green Belt Note (MLP/ED7) and Response to the

Inspector's Next Steps (MLP/ED10), is Policy S7 based on robust and up to date evidence?

5.16.1 Yes. Policy S7 is based on robust and up-to-date evidence. Following changes to national Green Belt and grey belt policy in the December 2024 Framework and February 2025 Planning Practice Guidance, the Council undertook a new Green Belt Review (B8) using a methodology specifically designed to reflect those changes. The evidence has been supplemented through MLP/ED6, MLP/ED7 and MLP/ED10, which provide additional justification regarding parcel assessment, exceptional circumstances, cross-boundary Green Belt issues and the rationale for the selected releases. The policy is further supported by the Sustainability Appraisal, strategic transport work and ongoing collaboration with Gravesham Borough Council. Taken together, the evidence demonstrates a proportionate, comprehensive and policy-led approach to defining Green Belt boundaries and identifying the limited areas proposed for release.

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

5.17.1 Yes. The Council is of the firm view that Policy S7 is informed by a robust evidence base prepared in response to the revised 2024 NPPF and 2025 PPG, and primarily the Green Belt Review (B8). This is set out in the Council's response to the Inspector's Initial Questions (MLP/ED6), the Green Belt Note (MLP/ED7) and the Response to the Inspector's Next Steps (MLP/ED10). Collectively, these documents demonstrate that the Council has revisited its Green Belt evidence and applied the current national policy framework rather than relying upon historic assessments alone.