

Green Belt Exceptional Circumstances Topic Paper

Submission Document

Medway Council

Regulation 22
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1 Introduction

1.1 Definition and purpose

- 1.1.1 Topic papers set out written material produced by the local planning authority to be submitted with a local plan for examination.
- 1.1.2 The purpose of this Topic Paper is to set out Medway Council's position on the identification of grey belt land and the exceptional circumstances for Green Belt release.

1.2 Background

- 1.2.1 Medway Council officers followed a rigorous site selection process to feed into the development strategy. This process was also informed by Duty to Cooperate meetings with neighbouring authorities, which together supports the process of consideration and the justification for exceptional circumstances.
- 1.2.2 Medway Council continues to have positive engagement with Gravesham Borough Council and Tonbridge & Malling Borough Council on strategic matters.
- 1.2.3 The Green Belt Review assessed all parcels of land within the Green Belt. The assessment was published in June 2025, along with other evidence base work.
- 1.2.4 The Green Belt Review sets out the methodology for including the assessment of grey belt land based on national and planning practice guidance.
- 1.2.5 The assessment provides a conclusion for each parcel and recommendations on boundary changes, which is brought together in a table in section 4 of the Green Belt Review, June 2025.
- 1.2.6 The review also identified some boundary anomalies that required Green Belt boundary amendments.
- 1.2.7 There has been a number of comments through the Regulation 19 consultation that objected to the change of Green Belt to grey belt regarding the Strood West site allocation. There was concern over the loss of farmland, loss of biodiversity and lack of justification for exceptional circumstances.
- 1.2.8 This topic paper will set out which Green Belt Review recommendations were carried forward with explanation. It will also provide clarity on the approach and justification for exceptional circumstances for Green Belt release regarding the Strood West site allocation.

2 Green Belt exceptional circumstances

2.1 National guidance

- 2.1.1 In December 2024, the National Planning Policy Framework (NPPF) was updated and introduced the term ‘grey belt’ with accompanying strategic guidance including on demonstrating exceptional circumstances. National guidance sets out that exceptional circumstances could include¹, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other. In such circumstances, the review of Green Belt boundaries is required to meet its needs in full.
- 2.1.2 Before concluding exceptional circumstances², it is required that Local authorities demonstrate having fully examined all other reasonable options for delivering its identified need for development, including:
- making as much use as possible of suitable brownfield sites and underutilised land.
 - optimising the density of development
 - has been informed by discussions with neighbouring authorities about accommodating unmet needs, as demonstrated through the statement of common ground
- 2.1.3 The NPPF then elaborates on a sequential approach³ in assessing suitability of land for selection giving priority to previously developed land and working back to Green Belt locations.
- 2.1.4 In defining Green Belt boundaries, the NPPF also places particular emphasis on achieving sustainable development⁴ and ensuring that there is consistency with the development plan’s strategy⁵ for meeting identified requirements for sustainable development.
- 2.1.5 Further detailed guidance and criterion in the planning practice guidance (PPG) followed in February 2025 to assist in the identification of grey belt land.
- 2.1.6 Both updates (NPPF and PPG) introduced new requirements and criterion including requirements for delivery of affordable housing, improvements to infrastructure and provision of green space as stipulated within the ‘Golden Rules’, a process and methodology for assessing parcels of land that could be identified as grey belt land.

¹ Paragraph 146

² Paragraph 147

³ Paragraph 148

⁴ Paragraph 148

⁵ Paragraph 149

3 Exceptional Circumstances

3.1 Duty to Cooperate

- 3.1.1 Medway Council continues to engage in duty to cooperate discussions with neighbouring authorities on strategic matters. These are documented in the Composite Duty to Cooperate report, Dec 2025 and Composite Statement of Common Ground, Dec 2025.
- 3.1.2 Discussions reflected the different stages that each authority was at in preparing their draft Local Plan. Medway Council had received a housing need request from Gravesham Borough Council, which had been considered in the Sustainability Appraisal. Discussions with other authorities reflected the higher housing need that needed to be met.
- 3.1.3 During the process of preparing the Medway Council Regulation 19 draft Local Plan, duty to cooperate discussions with Gravesham Borough Council promoted the need to assess and consider a cross border site allocation (Strood West and Chapter Farm).
- 3.1.4 This site was fed into the iterative process of assessing site allocations for Medway's development strategy (see Site Selection Topic Paper and Sustainability Appraisal: Volume 3, Appendix J).
- 3.1.5 A cross border site in the Green Belt in the Medway Valley was also discussed between Medway Council and Tonbridge & Malling Borough Council. During Medway's Regulation 19 preparation and before signing off on key evidence base documents informing the Local Plan, in discussions with Tonbridge & Malling Borough Council, Medway Council confirmed non-inclusion of the Halling site in its proposed development strategy. The two Local Plans were at different stages. Tonbridge & Malling Borough Council was at the early stages of preparing a Regulation 18 Local Plan consultation draft, and not able to confirm the outcome of assessment work and evidence gathering.
- 3.1.6 Tonbridge & Malling Borough Council is now out to consultation on its Regulation 18 draft Local Plan and has included part of the promoted site in the Medway Valley at a significantly reduced scale than promoted through the Call for Sites. Inclusion of the Medway part of this promoted cross border site could lead to coalescence.

3.2 Best use of suitable brownfield and underutilised land

- 3.2.1 The Site Selection topic paper and the Sustainability Appraisal set out how sites were assessed. Sites were rigorously considered and only suitable brownfield and underutilised land were identified for inclusion within the development strategy. Although Medway Council has a strong regeneration agenda and has been successful in delivering urban redevelopment, this alone was not sufficient to meet the development needs over the plan period and the plan's vision. Consideration of greenfield and grey belt was required, i.e. by following the sequential approach set out in national guidance.

- 3.2.2 The Strood West site allocation performed well in achieving sustainable growth being serviced by the A289, M2 J1 corridor and being on the urban edge of Strood District Centre. Services and facilities would be in proximity and would be highly accessible and benefit from public transport links. The site area has the potential to deliver a sustainable community with required infrastructure.

3.3 Optimising density

- 3.3.1 Densities were optimised using best practice guidance and realistic market expectations. Information from developers, historic planning applications and pre-applications were also fed in to ensure estimations were realistic, and would not conflict with heritage, landscape and urban design policy and guidance.

3.4 Consistency with the Local Plan strategy

- 3.4.1 The Medway Local Plan has four overarching strategic objectives, which provide a golden thread of sustainability. Inclusion of the Strood West site is consistent with the development plan's strategy and for meeting the identified requirements for sustainable development. It provides for homes, services, employment, green infrastructure and sustainable travel.

4 Identification of grey belt

4.1 Methodology

- 4.1.1 The Green Belt Review followed a robust methodology to update the 2018 study using the December 2024 NPPF and 2025 planning practice guidance.
- 4.1.2 The first stage required a review of the parcel identification, which resulted in twenty parcels and informed by a detailed methodology and considerations.
- 4.1.3 Each parcel was then assessed using a template incorporating NPPF and planning practice guidance criterion.
- 4.1.4 An explanation of how each criterion would be used to assess the parcels is then set out with due regard to footnote 7, which details sensitive landscapes that require careful consideration. Parcels located in or within the setting of the footnote 7 designations could be a strong reason for refusing or restricting development. This is also given consideration against the purposes of the Green Belt.

4.2 Findings

- 4.2.1 The Green Belt Review identified sites in and around the Strood West site allocation and a few other sites to be grey belt. The table below sets out the parcels identified and the recommendations carried forward from the Green Belt Review.

Table 1: Grey Belt considerations

	Parcels	Inclusion/exclusion as grey belt
1	<i>Parcel 1 – Rochester Football club</i>	Identified as grey belt and removed on proposals map.
2	<i>Parcel 2 – North of Rede Court Road</i>	Identified as grey belt and removed on proposals map.
3	<i>Parcel 3 – Brompton Farm Road</i>	Identified as grey belt and removed on proposals map.
4	<i>Parcel 4 – Brompton Farm Road/Stone Horse lane</i>	Identified as grey belt and removed on proposals map.
5	<i>Parcel 9 – Railway line edge</i>	Could align better with nature reserve boundary. <i>(amendment required to proposals map).</i>
6	<i>Parcel 12 – North Halling</i>	Identified as grey belt. <i>(amendment required to proposals map).</i>

7	<i>Parcel 13 – St Andrews Lakes</i>	Uses permitted are in-keeping with the Green Belt and protects further sprawl into the Green Belt. <i>(amendment required in Green Belt Review)</i>
8	<i>Parcel 17- former reservoir</i>	Should be washed over as Green Belt – in-keeping with residential area of Upper Halling. <i>(amendment required in Green Belt Review)</i>

Table 2: Boundary anomalies

	Parcels	Amendment
1	<i>Parcel 1: Land to the west of Cliffe Woods</i>	Option 1 chosen and carried forward on proposals map.
2	<i>Parcel 2: Land to the north east of Stone House Farm</i>	Amended on proposals map to align with clear physical boundary of the road.
3	<i>Parcel 3: Land to the west of the M2</i>	Amended on proposals map to avoid overlap with the M2 and some of the slip road.

- 4.2.2 Boundary changes to parcels 1, 2, 3, 4, 9 and 12 are set out in Appendix A and a few minor boundary changes set out in the Appendix B.

5 Conclusions

- 5.1.1 Following the Regulation 19 consultation, and a Planning Inspectorate 'advisory visit' in September 2025, the Council has prepared this Topic Paper to set out the considerations arising from the Green Belt Review and the justification for exceptional circumstances.
- 5.1.2 Medway's site selection process was iterative and rigorous and included the consideration of discussions with neighbouring authorities on potential cross border sites. It considered the impact of proposed and planned development in neighbouring boroughs on land in Medway, including the functioning of the Green Belt if adjacent land in Gravesham was developed.
- 5.1.3 Medway Council has included the Strood West site allocation as a cross border site with Gravesham Borough Council.
- 5.1.4 The promoted potential cross border site with Tonbridge & Malling Borough Council has not been included within Medway's development strategy.
- 5.1.5 The Green Belt Review provides a useful tool for decision making on Green Belt boundary changes and grey belt land release.
- 5.1.6 This topic paper confirms the release of parcels 1, 2, 3, 4, 9 and 12. Parcels 2, 3 and 4 make up Strood West – part of the cross border site allocation with Gravesham Borough Council.
- 5.1.7 The topic paper confirms the exceptional circumstances for grey belt release.
- 5.1.8 Three boundary anomalies have also been carried forward as boundary changes where they appeared as anomalies that did not coincide with strong boundaries as required by national guidance.

Appendix A

Boundary changes – grey belt

A.1.1 Parcel 1: Rochester Football club

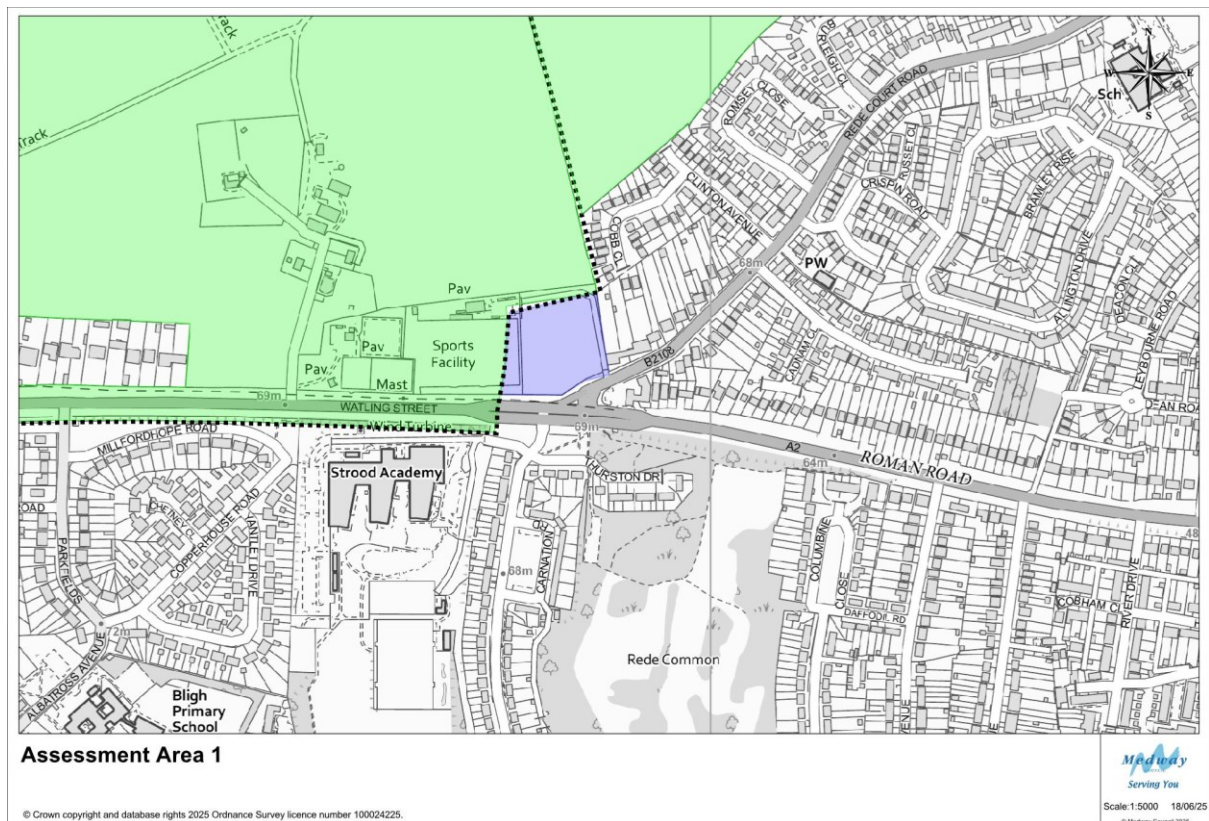


Figure 1: Rochester Football Club

Moderate: This contribution is considered not significant and is therefore grey belt.

Recommendation: Amend Green Belt boundary/release

A.1.2 Parcel 2: Land north of Rede Court Road

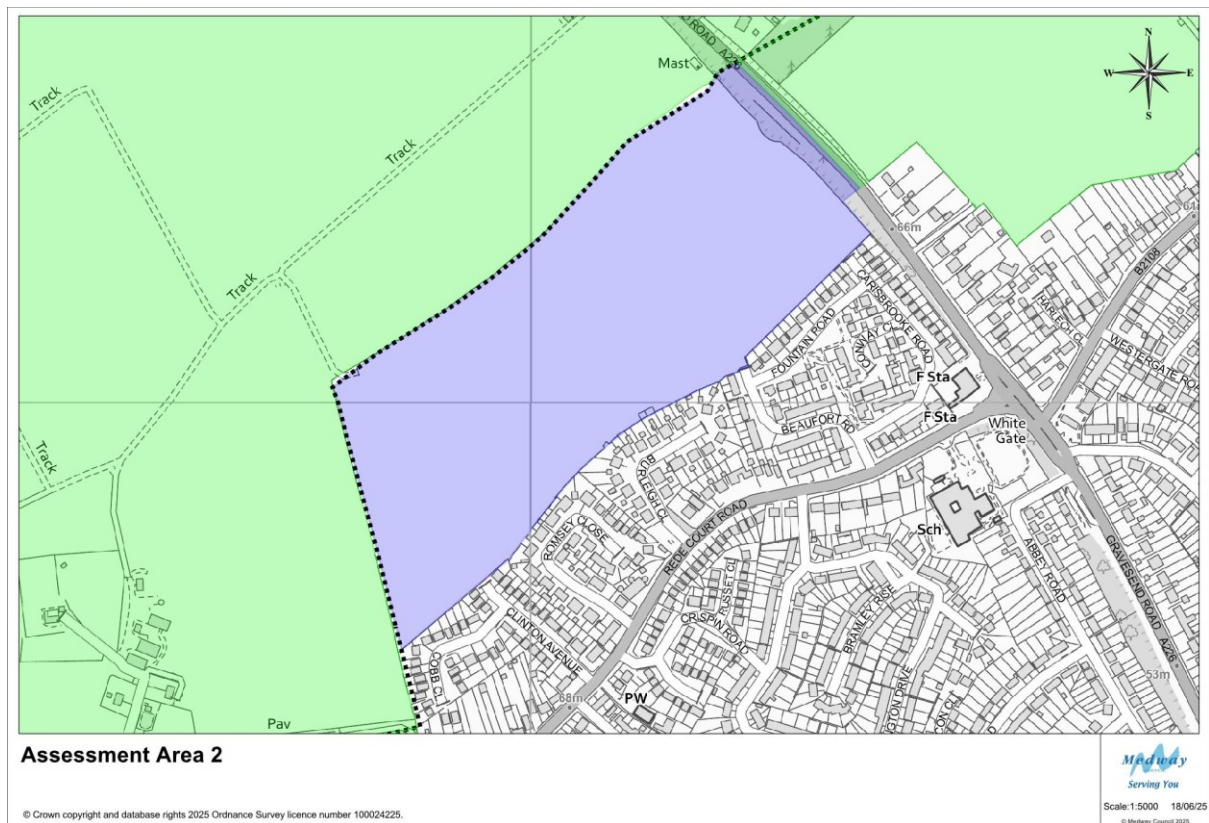


Figure 2: Land to north of Rede Court Road

Moderate: This contribution is considered not significant and is therefore grey belt.

Recommendation: Amend Green Belt boundary/release

A.1.3 Parcel 3: Brompton Farm Road

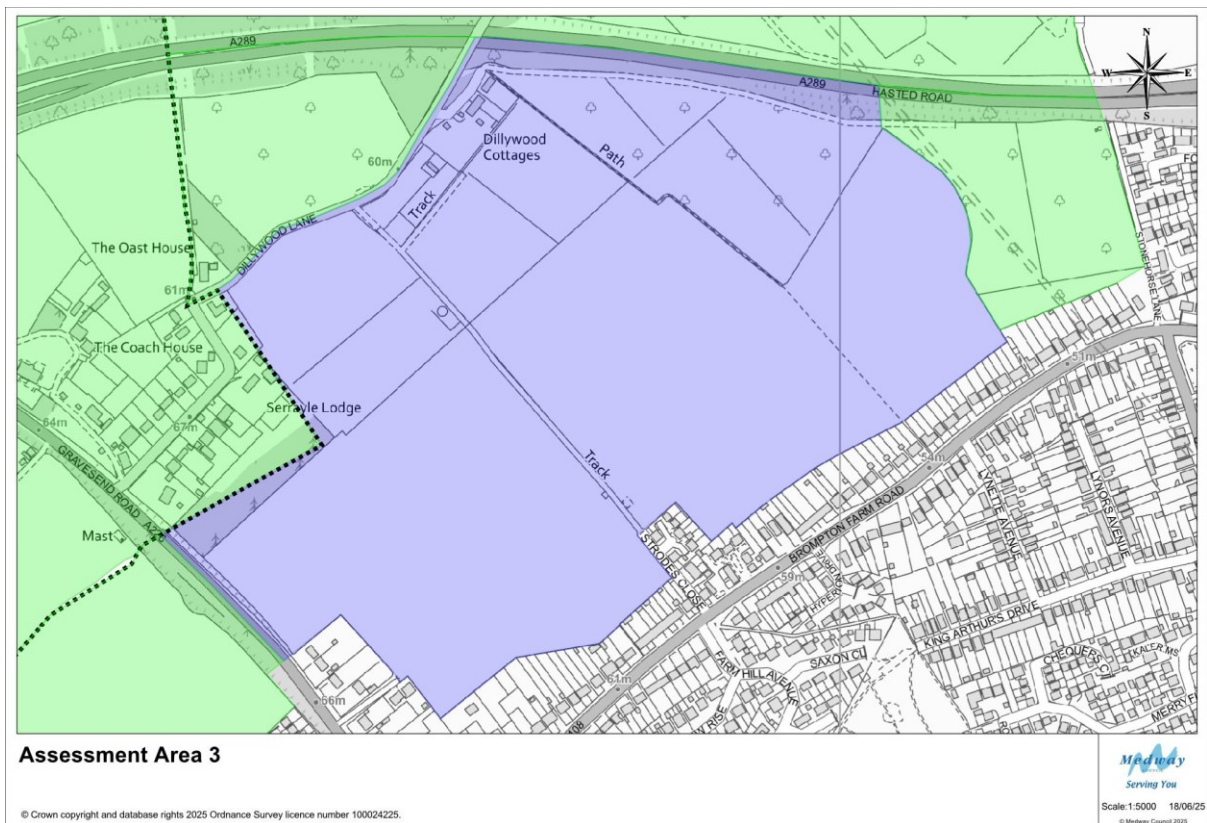


Figure 3: Brompton Farm Road

Moderate: This contribution is considered not significant and is therefore grey belt.

Recommendation: Amend Green Belt boundary/release

A.1.4 Parcel 4: Brompton Farm Road/Stone Horse Lane

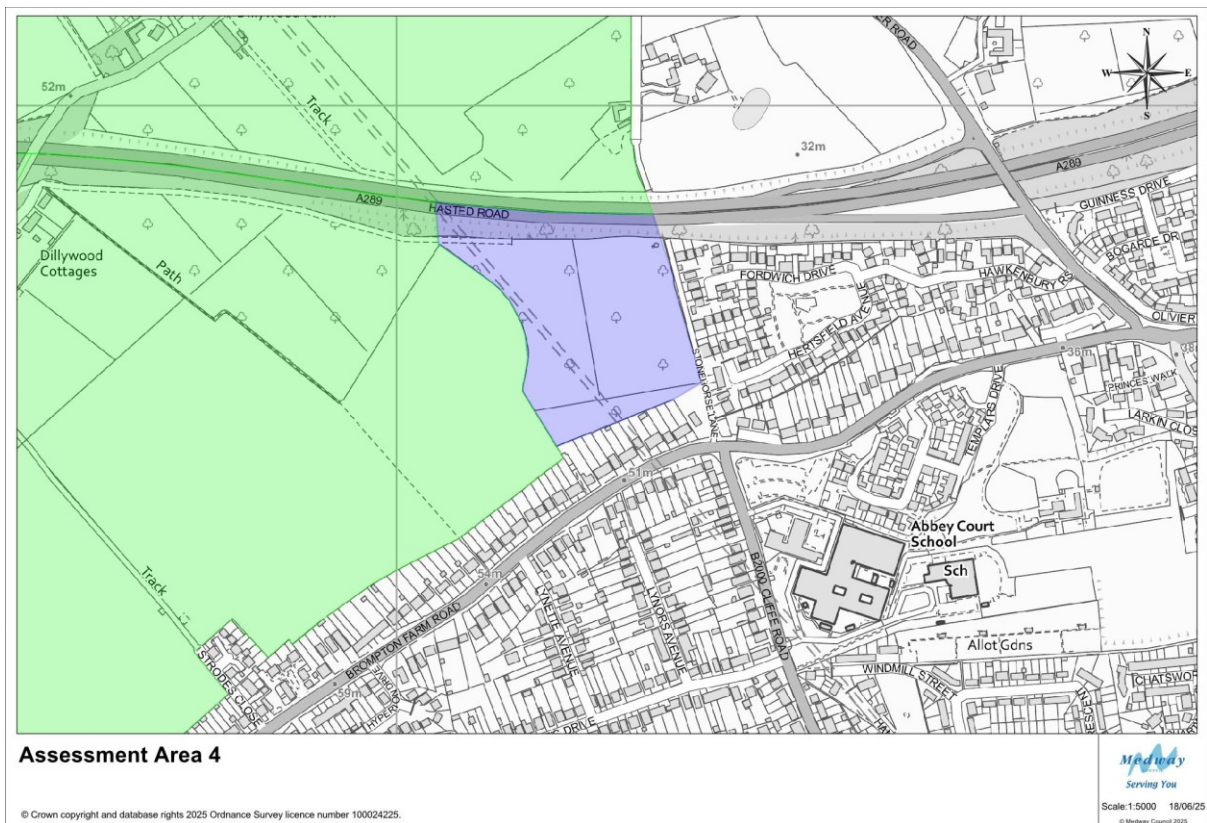


Figure 4: Brompton Farm Road/Stone Horse Lane

Moderate: This contribution is considered not significant and is therefore grey belt.

Recommendation: Amend Green Belt boundary/release

A1.5 Parcel 9: Railway line edge

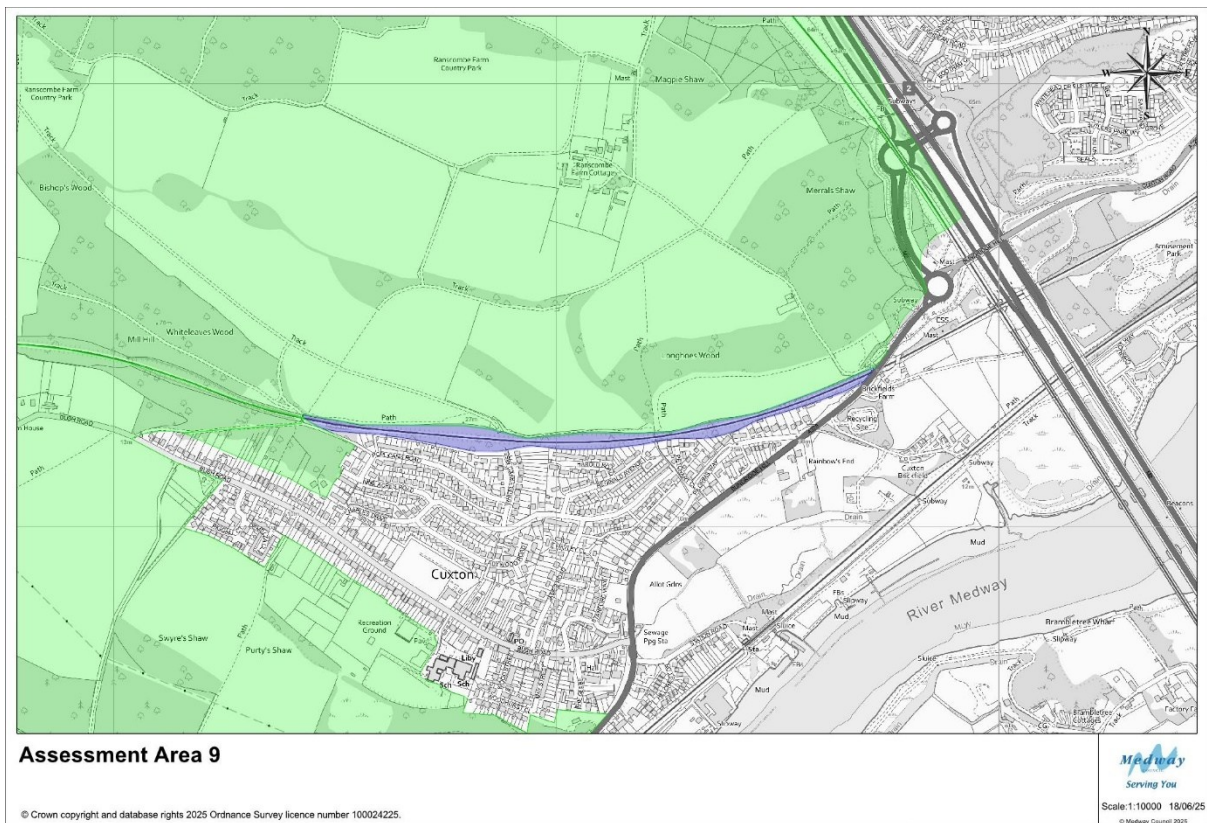


Figure 5: Railway line edge

Moderate: The contribution is not significant and is therefore grey belt.

Recommendation: Remove from Green Belt

A.1.6 Parcel 12: North Halling

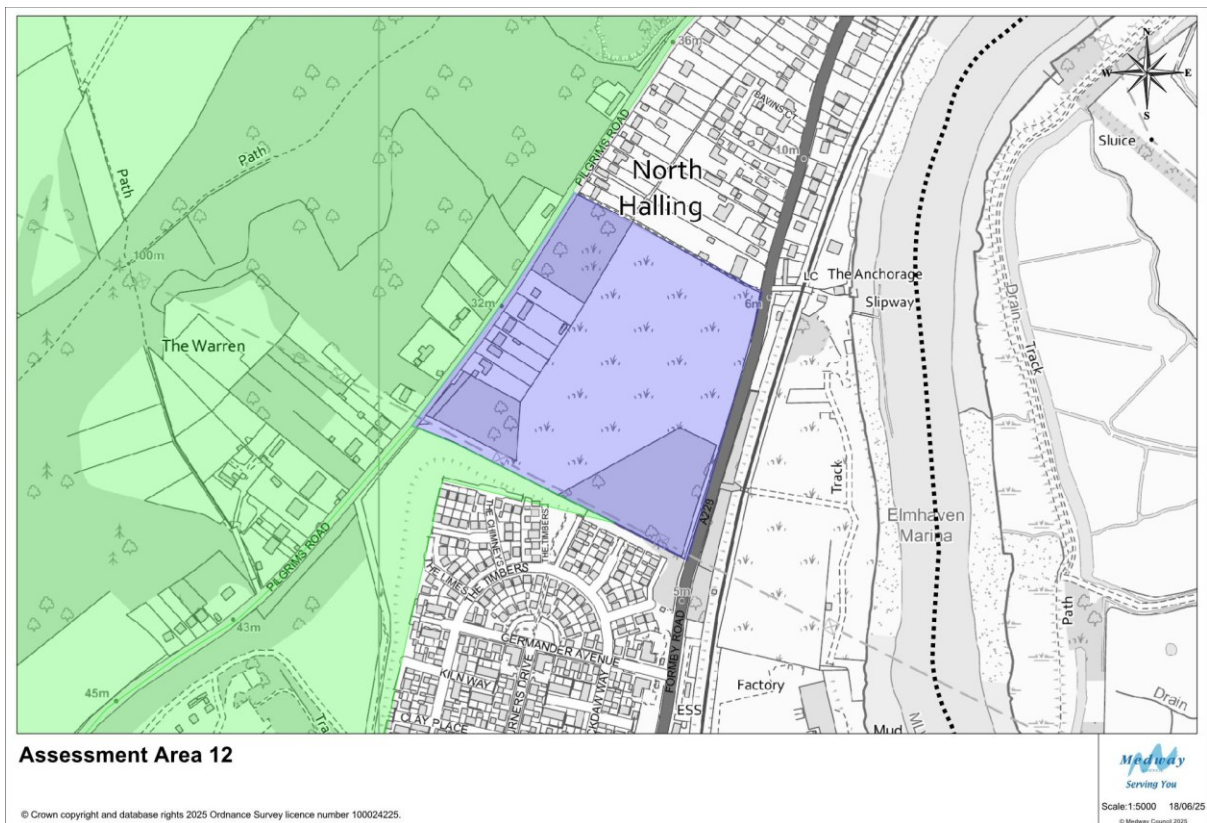


Figure 6: North Halling

Moderate: this contribution is considered not significant and is therefore grey belt.

Recommendation: Remove from Green Belt/identified as grey belt.

Appendix B

Boundary Changes

B.1 Boundary anomalies

B.1.1 Parcel 1: Land to the west of Cliffe Woods

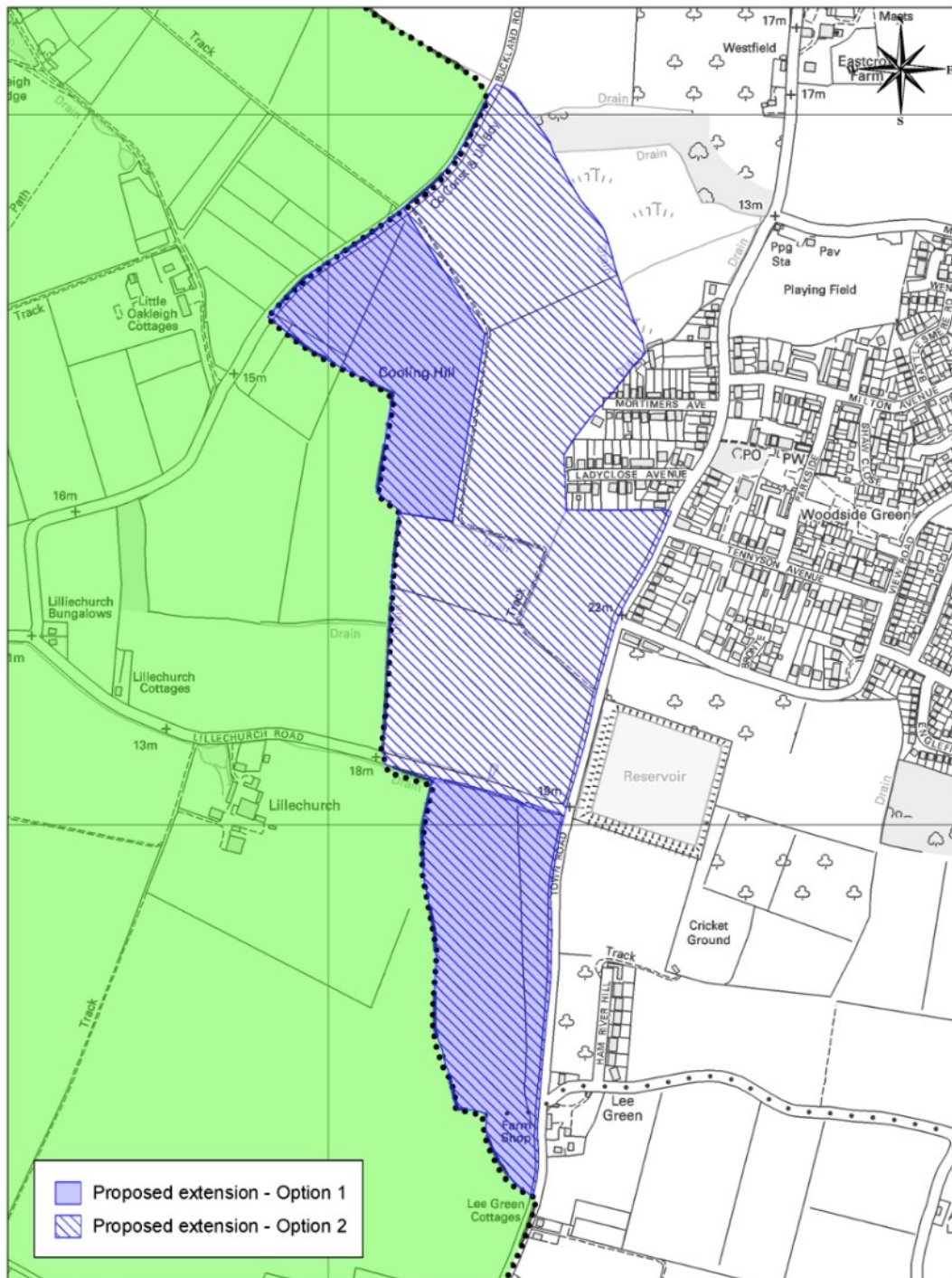


Figure 1: Land to west of Cliffe Woods.

The district boundary offers poor physical definition at Cooling Hill and land to south of Lillechurch Road and west of Town Road.

Recommendation: Fig 11 describes two options. Option 1 involves minor adjustments to provide stronger physical edges. Option 2 includes Option 1 but proposes a more significant

adjustment, extending the green belt to follow a very strong existing field boundary and then heading south, following the developed edge of Cliffe Woods and strong physical edge of Town Road. Option 1 is preferred and reflected in the proposals map covering the north west.

B.1.2 Parcel 2: Land to the north east of Stone House Farm

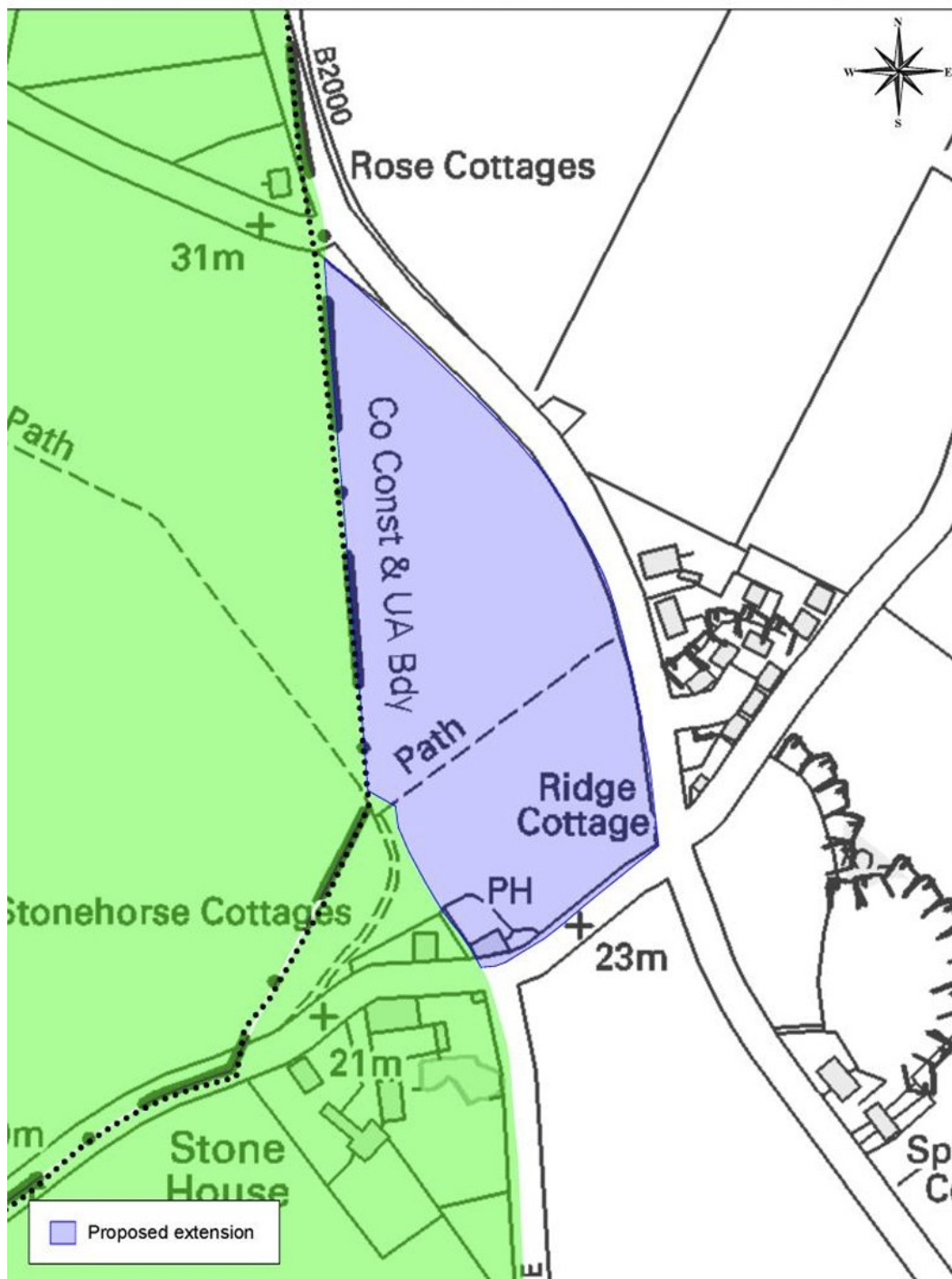


Figure 2: Land to north east of Stone House Farm.

Recommendation: Extend Green Belt to follow Dillywood Lane and B2000

Figure 3: Land to west of M2.

There are inconsistencies in the Green belt boundary mapping along the eastern edge of this parcel. The Green Belt overlaps the M2 and some of the slip road.

Recommendation: Adjust Green Belt boundary to clearer physical boundaries as indicated on fig 13 proposals of Green Belt Review 2025.