

Tonbridge & Malling Borough Council

Tonbridge & Malling Borough Council Green Belt Assessment- Stages 1 and 2

Methodology (Final)

01 | September 2025



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Contents

1.	Introduction	5
1.1	Study purpose	5
1.2	Role of Green Belt Assessment	5
1.3	Document structure	6
2.	Tonbridge and Malling Green Belt Context	7
2.1	The evolution of the Metropolitan Green Belt	7
2.2	Tonbridge and Malling Green Belt today	7
2.3	Tonbridge and Malling policy context	9
2.4	Previous Green Belt Assessment work	9
3.	National policy, guidance, appeals and experience elsewhere	10
3.1	Overview	10
3.2	National Planning Policy Framework (2024)	10
3.3	Updated Planning Practice Guidance (2025)	11
3.4	Appeal decisions	16
3.5	Experience elsewhere	17
3.6	Implications for this study	20
4.	Assessment Methodology	23
4.1	Overview	23
4.2	Assessment against NPPF Purposes	23
4.3	Stage 1 Green Belt assessment methodology	42
4.4	Stage 2 Green Belt Assessment methodology	46

Tables

Table 1	Criterion Scores	26
Table 2	Built-up area (BUA) size classification	27
Table 3	Large Built-Up Areas relevant for purpose (a) assessment	27
Table 4	Purpose (a) assessment criteria	30
Table 5	Towns relevant for purpose (b) assessment	31
Table 6	Purpose (b) Assessment Criterion	32
Table 7	Purpose (c) assessment criterion	35
Table 8	Neighbouring Local Authorities	36
Table 9	Purpose (d) Assessment Criterion	37
Table 10	Percentage of new dwellings on Green Belt land, 2014-2022	40
Table 11	New residential dwellings on Green Belt Land	41
Table 12	Settlements and other locations in the Borough considered for the purpose of identifying sub-areas for the Stage 2 assessment	49
Table 13	Boundary Features for Identifying Sub-areas	50
Table 14	NPPF Footnote 7 Constraints	55
Table 15	Sub-area Categorisation/Recommendations	57

Figures

Figure 1 Tonbridge and Malling Green Belt	8
Figure 2 When can land be identified as grey belt?	15
Figure 3 Stage 2 GBA methodology diagram	25
Figure 4 Stage 1 GBA methodology diagram	25
Figure 5 Illustration of connected, contiguous and enclosed	28
Figure 6 Large Built-Up Areas considered in purpose (a) assessment	29
Figure 7 Towns considered in purpose (b) assessment	33
Figure 8 Historic towns considered in purpose (d) assessment	38
Figure 9 Stage 1 Green Belt parcels for assessment	45
Figure 10 Sites promoted to the Council for development	48
Figure 11 Major Policy Constraints	52
Figure 12 Stage 2 Sub-areas	54

Drawings

No table of figures entries found.

Pictures

No table of figures entries found.

Photographs

No table of figures entries found.

Attachments

No table of figures entries found.

Appendices

A.1	Review of planning appeals	59
A.2	Review of Green Belt Assessment elsewhere	66
A.3	Glossary of Terms and Acronyms	67
A.4	Duty to Co-operate Consultation	69
A.5	Sub-area maps by settlement	73

1. Introduction

1.1 Study purpose

Ove Arup & Partners Ltd (Arup) has been appointed by Tonbridge and Malling Borough Council to undertake a Green Belt Assessment (GBA). It is intended to form part of the evidence base for the new Local Plan for the Borough. The Green Belt Assessment comprises a two-stage assessment of the Tonbridge and Malling Green Belt against the purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF) and provisionally identifies grey belt (a subset of Green Belt land first introduced by the 2024 update to the NPPF and detailed further in the 2025 update to the PPG).

Tonbridge and Malling Borough is tightly constrained by the Metropolitan Green Belt, parts of two National Landscapes¹ and has limited capacity within existing settlements. The Council must plan positively for growth up until 2042 with a recently increased annual local housing need- and also needs to take account of potential development needs beyond the plan period. As part of this process, the Council needs to consider the role Green Belt land will play in any future spatial strategy. The GBA will help provide the evidence to enable the Council to make robust decisions.

1.2 Role of Green Belt Assessment

The purpose of a GBA is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the NPPF (2024), and to provisionally identify grey belt, as set out in the national Planning Practice Guidance (PPG) (2025). The local planning authority then takes the findings of the assessment into account alongside other evidence in making decisions about the Local Plan strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries.

A GBA forms an important part of the Local Plan evidence base. It helps a council determine the manner and degree to which change in the Green Belt should be considered without undermining the purposes for including land in the Green Belt and the degree to which harm to the Green Belt would result if development were to take place.

Typically, a GBA is undertaken in two stages. The first stage examines the performance of a borough's Green Belt in its entirety while the second stage is more granular and examines the performance of discrete, smaller Green Belt parcels, primarily adjacent to existing sustainable settlements or in locations with good access to public transport, as part of emerging growth options.

A GBA is not a policy or decision-making document that proposes any release of Green Belt land. This falls to a council as part of the wider plan-making process. Green Belt is also not the only consideration when assessing the suitability and deliverability of sites. A council is not precluded from allocating Green Belt sites for development if other factors in favour of the site outweigh this consideration. Such factors might include:

¹ The Kent Downs and the High Weald National Landscapes

- Housing or employment need and a lack of supply of alternative sites (i.e. those that the NPPF directs plan-makers towards before considering Green Belt);
- Adverse implications for the Borough's sustainable development strategy;
- Inherent sustainability of directing growth in a particular direction;
- Tightly drawn Green Belt boundaries and constraints on alternative sites;
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents; and/or
- Boosting housing delivery in areas with past issues of deliverability to increase the supply of affordable housing.

A GBA does not set out 'exceptional circumstances' arguments, which will be needed if a council proposes release of land from the Green Belt. However, the outcomes from a GBA will form part of any exceptional circumstances case presented to support Green Belt alterations.

1.3 Document structure

This document sets out the methodology for carrying out a GBA in two stages- known as Stages 1 and 2. This GBA will replace an existing Stage 1 GBA carried out by the Council in 2016 and will provide the Council with a new Stage 2 GBA.

The methodology employed draws on the implications identified from a contextual review of Green Belt planning appeals and assessments elsewhere (Appendices A.1 and A.2 respectively). Appendix A.3 sets out a glossary of Green Belt terms and acronyms.

At the time of writing no Local Plan had yet gone through Examination under the revised NPPF and guidance. Therefore, consideration has been given to the interpretation of the new NPPF and Green Belt PPG derived from appeal case law and legal seminars. As part of the development of the methodology, the Council consulted with its Duty to Co-operate (DtC) partners. A summary of the duty to cooperate comments and subsequent revisions to the methodology can be found in Appendix A.4.

The methodology report is structured as follows:

- Section 2 provides the local Green Belt context for Tonbridge and Malling;
- Section 3 sets out the implications for this assessment following a review of planning policy, guidance, legal precedents and experience elsewhere for Green Belt assessments; and
- Section 4 presents the NPPF Green Belt purposes and the criteria used in the assessment of the Green Belt for both Stage 1 and Stage 2 and then details the specific methodology followed in the Stage 1 GBA and Stage 2 GBA, including grey belt identification.

2. Tonbridge and Malling Green Belt Context

2.1 The evolution of the Metropolitan Green Belt

The concept of Green Belt dates back to the origins of the modern British planning system and is frequently credited as one of the most notable achievements of the planning system, halting the outward ‘sprawl’ of London into the countryside. The rapid expansion of the railways in the 19th and early 20th centuries had suddenly brought once remote settlements within commuting distance of central London. Sevenoaks witnessed a change in its character during this period. This brought increased residential development to Tonbridge and other towns in the borough, although the majority of the borough retained its predominantly rural character.

After the war, concerns grew about rapid change of rural areas around London and the impact of urban sprawl. The Metropolitan Green Belt, first suggested by Raymond Unwin in 1933 as a green girdle and defined by Patrick Abercrombie in the Greater London Plan of 1944 (later established in the Town and Country Planning Act of 1947), curtailed the further unchecked growth of London’s urban area.

Circular 42/55, released by the government in 1955, encouraged local authorities to establish their own Green Belts. The 1955 Circular set out three main functions of the Green Belt:

- To check the growth of large built-up areas;
- To prevent neighbouring settlements from merging into one another; and
- To preserve the special character of a town.

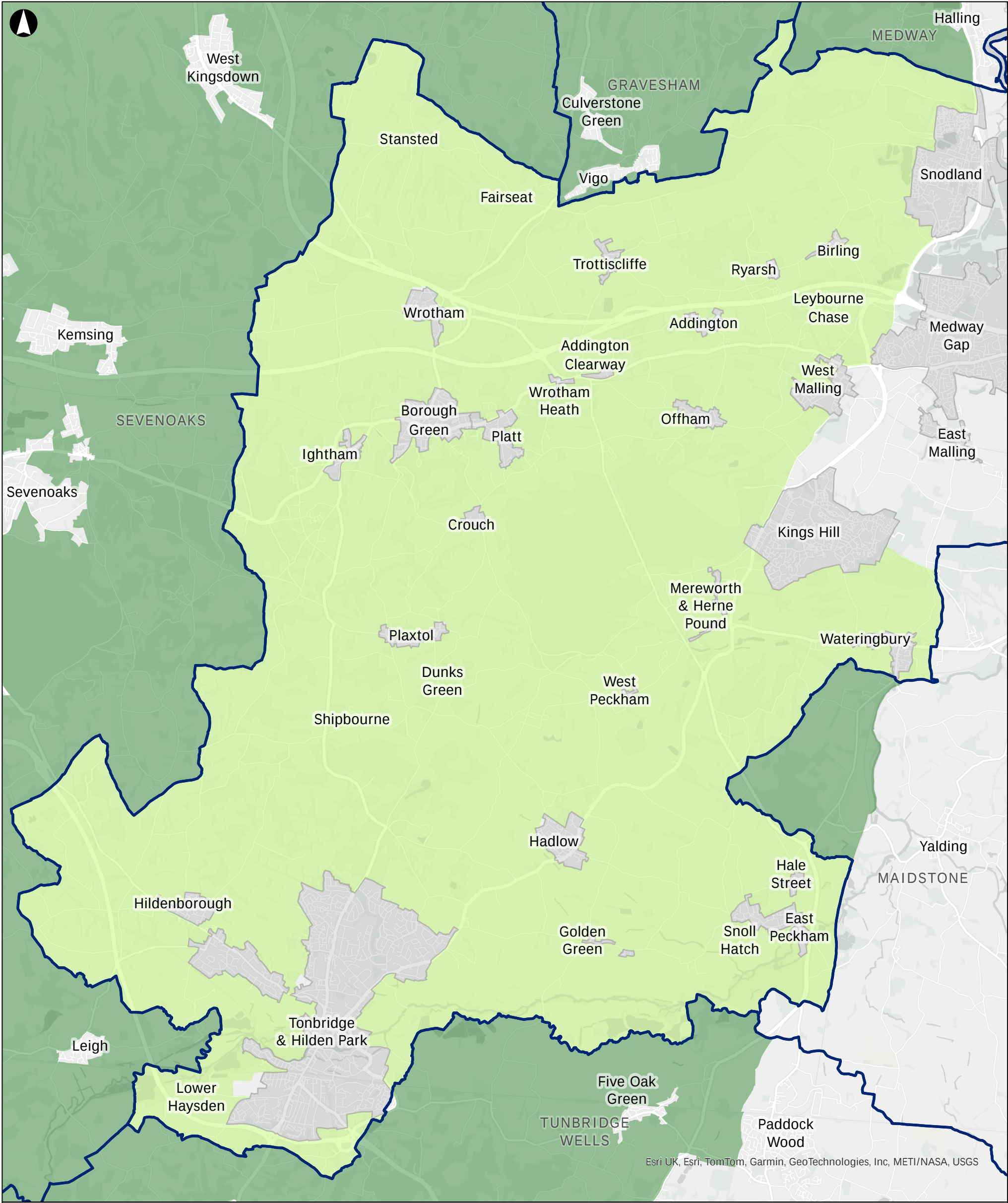
Circular 50/57, published in 1957, distinguished the inner and outer boundaries of Green Belts and established the importance of defined and detailed permanent boundaries. Later, in 1962 the Minister of Housing and Local Government published the advice booklet titled ‘The Green Belts’. The booklet recorded that the last of the Home Counties development plans had been approved in 1959, enabling the completion of the first Metropolitan Green Belt. However, it was not until 1971 that this saw significant expansion.

The 1958 Kent Development Plan and County Map provided the first designation of Green Belt in Tonbridge and Malling Borough.

2.2 Tonbridge and Malling Green Belt today

Tonbridge and Malling is tightly constrained by the Metropolitan Green Belt (Figure 1) as 71% of the Borough (approximately 17,049 hectares) is designated as such.

Within the Green Belt, many hamlets and small clusters of development are washed over by the Green Belt designation, while larger settlements are inset from it.



- Local Authority Boundaries
- Tonbridge & Malling Green Belt
- Neighbouring Green Belt
- Settlements

Metres					
0	500	1,000	2,000		
--	Aug 2025	WJ	JH	KK	--
Rev	Date	By	Chkd	Appd	Authd

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Client
Tonbridge & Malling Borough Council

Project Name
Tonbridge & Malling Green Belt Assessment

Coordinate System: British National Grid

Drawing Title
Figure 1 Tonbridge and Malling Green Belt

Scale at A3
1:65,000

Role
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Suitability
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Project Number
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Drawing Name
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Rev
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2.3 Tonbridge and Malling policy context

Tonbridge and Malling Development Plan is currently made up of the Core Strategy DPD (2007), the Development Land Allocations DPD (2008) and the accompanying policies map, the Tonbridge Central Area Action Plan (AAP, 2008), the Managing Development and the Environment DPD (2010) as well as Kent Minerals and Waste plans.

Tonbridge and Malling Borough Council (TMBC) is now preparing a new Local Plan to 2042, and the Local Development Scheme agreed in March 2025 anticipates that the Local Plan will be submitted for Examination by December 2026. This new two- stage GBA will be part of the suite of evidence base documents which will underpin the Local Plan.

2.4 Previous Green Belt Assessment work

A Stage 1 GBA was previously published in 2016; and a Stage 2 GBA was started in 2022 by Arup. Following the publication of the new national Green Belt policy and guidance in 2024/25, a review of these previous studies was undertaken. It was concluded that amendments were necessary to ensure full alignment with the new policy and guidance.

3. National policy, guidance, appeals and experience elsewhere

3.1 Overview

The section provides summaries of the points below, before considering the implications of each for this methodology paper:

- Relevant national Green Belt policy (NPPF) and guidance (PPG).
- An analysis of how Inspectors have been interpreting the new policy and guidance in recent planning appeal decisions.
- Experience in other authorities and insights from Independent Examinations on the topic.

3.2 National Planning Policy Framework (2024)

Although there have been some key changes in relation to Green Belt policy since the NPPF was first published in 2012, the majority of the policies in relation to Green Belt and plan-making have been retained and remain unchanged in the 2024 NPPF. These include:

- The fundamental aim of Green Belt policy to “prevent urban sprawl by keeping land permanently open” (NPPF 2024, para 142).
- The five main purposes of Green Belt (NPPF 2024, para 143):
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighboring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- The intended permanence of the Green Belt (NPPF 2024, paras 144, 145).
- Alterations to Green Belt only to be undertaken in exceptional circumstances (NPPF 2024, para 145)
- The need to take into account sustainable patterns of development (NPPF 2024, para 148)
- Boundary definition requirements (NPPF 2024, para 149)
- Considerations as to whether villages should be included or excluded from the Green Belt (NPPF 2024, para 150).
- Need for positive planning in the use of Green Belt land (NPPF 2024, para 151).

However, the 2024 version of the NPPF included a number of significant changes for plan-making relating to exceptional circumstances, grey belt and sequential release of Green Belt land.

3.2.1 Exceptional circumstances

The 2024 NPPF requires authorities that cannot meet their identified need for homes, commercial or other development through other means to review their Green Belt boundaries: *“If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alternations to meet these needs in full.”* The review of Green Belt boundaries for this reason now constitutes grounds for Exceptional Circumstances to release Green Belt land (NPPF 2024, paragraph 146).

The new requirement to consider Green Belt land to meet housing and other requirements is mitigated at a high-level by an additional test introduced in paragraph 146, and which the Council will have to demonstrate in any Exceptional Circumstances case. The test stipulates that Green Belt boundaries should not be altered where that would *“fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan”* (NPPF 2024, paragraph 146),

3.2.2 Grey belt

The NPPF 2024 introduced a sub-category of Green Belt land called grey belt. Grey belt is defined as:

“land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development” (NPPF 2024, glossary).

Footnote 7 identifies a number of constraints which may preclude land from being considered as grey belt. The PPG provides further guidance on how Footnote 7 should be applied when identifying land as grey belt, including that authorities should consider where areas of grey belt would be covered by or affect other designations in Footnote 7.

3.2.3 Sequential release of Green Belt land

NPPF 2024 paragraph 148 introduces a sequential approach to the release of Green Belt land: *“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.”* As in the previous versions of the NPPF, when applying this approach and the release of Green Belt is proposed, consideration still needs to be given to promoting sustainable patterns of development. The NPPF further states that it is necessary to consider whether *“the site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework”* (NPPF 2024, paragraph 148). *Paragraphs 110 and 115 focus on sustainable development locations and sustainable transport solutions.”*

3.3 Updated Planning Practice Guidance (2025)

In February 2025, the government updated the Green Belt PPG to take into account the changes made to the NPPF in December 2024. The PPG now provides guidance for plan-making on:

- how to assess Green Belt to identify grey belt within it, in particular how to assess land against the NPPF Green Belt purposes (a), (b) and (d);
- how to consider the impact of development, or of release of land on the remaining Green Belt in the plan area; and
- how to identify sustainable locations when considering the release of Green Belt land.

The PPG also provides guidance on how to consider proposals on potential grey belt land for the purpose of decision making, including when a proposal on grey belt land may not constitute inappropriate development in the Green Belt. This summary focuses on the plan-making guidance.

3.3.1 Grey belt

The guidance makes it clear that the identification of grey belt land does not necessarily mean that the land should be allocated for development or released from the Green Belt. The contribution of the land to the Green Belt purposes needs to be considered alongside wider NPPF policies in making any decisions about Green Belt land.

GBAs, and the identification of grey belt, should be part of the plan-making process, with the expectation that the identification of grey belt land will allow for the prioritisation of land detailed in paragraphs 147 and 148 of the NPPF².

3.3.2 Assessing Green Belt to identify grey belt land

Local authorities should produce a GBA in order to identify grey belt land. When updating or preparing plans, authorities will need to consider whether any existing Green Belt assessment remains up to date.³

3.3.3 Key steps in a GBA to identify grey belt land⁴

The key steps of a GBA used to identify grey belt are as follows:

- Identify the location and appropriate scale of area to be assessed;
- Evaluate contribution to purposes (a), (b) and (d);
- Consider if any of the Footnote 7 restrictions apply;
- Identify provisional grey belt; and
- Identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.

² Paragraph: 001 Reference ID: 64-001-20250225

³ Paragraph: 002 Reference ID: 64-002-20250225

⁴ Paragraph: 003 Reference ID: 64-003-20250225

3.3.4 GBA spatial scope⁵

The PPG stipulates that the Green Belt should be divided into assessment areas for the purpose of identifying grey belt. The number and size of assessment areas should respond to local circumstances. The whole Green Belt should be considered in the first instance with sufficient granularity (i.e. by dividing it into smaller assessment areas) to enable conclusions to be drawn on the variable contribution of different parts of the Green Belt to the purposes.

It further states that a small number of large assessment areas will not be appropriate in most circumstances and authorities should consider whether there are opportunities to better identify grey belt by further subdividing assessment areas. Finer grained assessment may be appropriate in specific locations, such as around existing settlements or public transport hubs or corridors.

3.3.5 Purpose assessment

The PPG provides explicit guidance on how to conduct a GBA to identify grey belt in relation to purposes (a), (b) and (d)⁶. It is silent on purposes c and e as they are not included within the grey belt definition.

Large built-up areas, towns and villages

The definition of towns, and large built-up areas for the purpose of assessing purposes (a), (b) and (d) has been clarified. Villages should not be included for the purpose of assessing these purposes.

To check the unrestricted sprawl of large built-up areas (purpose a)

Appendix A The PPG sets out illustrative factors that should be considered when assessing performance against purpose (a):

- Adjacency to large built-up area(s);
- Extent of existing development in assessment area and impact of other urbanising influences;
- Presence, or otherwise, of physical feature(s) in reasonable proximity that could restrict and contain development; and
- Shape of development if released, with degree of enclosure and incongruous patterns of development considered.

To prevent neighboring towns merging into one another (purpose b)

The PPG sets out illustrative factors that should be considered when assessing performance against purpose (b):

- Location of assessment area in relation to defined towns.
- Extent of existing development in assessment area.

⁵ Paragraph: 004 Reference ID: 64-004-20250225

⁶ Paragraph: 005 Reference ID: 64-005-20250225

- Scale to which the assessment area forms part of the gap between towns.
- Degree to which the development of the assessment area would result in loss of visual separation of towns, including whether there are any physical or natural features that might preserve visual separation.

To preserve the setting and special character of historic towns (purpose d)

The PPG notes that if there are no historic towns, a detailed assessment may not be necessary. It sets out illustrative factors that should be considered when assessing performance against purpose (d):

- Extent of existing development in assessment area;
- Role that the assessment area plays in the setting of the historic town.
- Contribution that the assessment area makes to the special character of the historic town. This should consider physical, visual and experiential links between the assessment area and the historic aspects of the town.
- Degree of separation of assessment area from the historic aspects of the town by existing development or topography.

3.3.6 Application of footnote 7

The grey belt definition excludes land where the constraints identified in NPPF footnote 7 would provide a strong reason for refusing or restricting development. Designations listed as effective constraints in footnote 7 include: habitat sites, Sites of Special Scientific Interest (SSSI); Local Green Space, National Landscapes, National Parks or Heritage Coasts; irreplaceable habitats; designated heritage assets; and areas that are at risk of flooding or coastal change.

The PPG makes it clear that authorities need to consider not only areas where grey belt would be covered by these designations but also whether it would affect these definitions. Where these constraints are present within a local authority area, it is likely to only be possible to provisionally identify such land as grey belt in advance of more detailed specified proposals and impact assessment.⁷

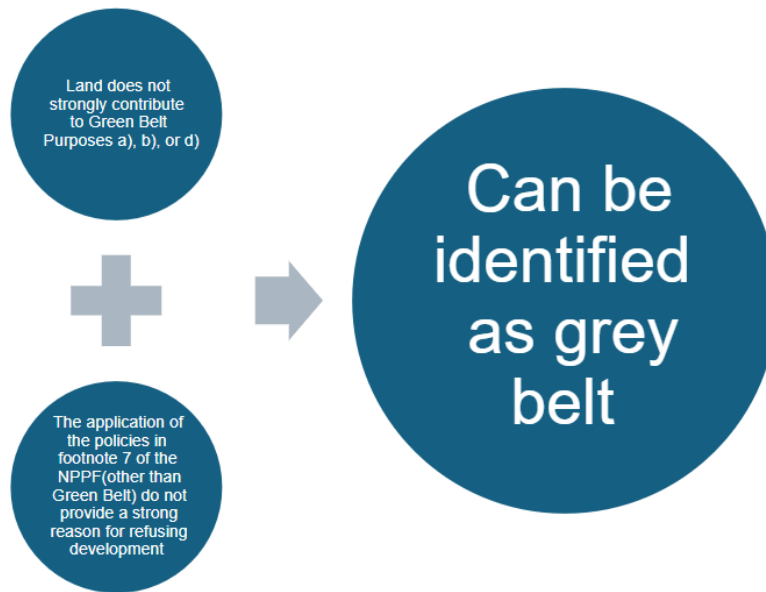
3.3.7 Assessing whether land is grey belt

Green Belt land judged not to strongly contribute to any one of the purposes (a), (b) and (d) and subject to the Footnote 7 exclusions, can be provisionally identified as grey belt.⁸

⁷ Paragraph: 006 Reference ID: 64-006-20250225

⁸ Paragraph: 007 Reference ID: 64-0010-20250225

Figure 2 When can land be identified as grey belt?



Source: UK Government Planning Practice Guidance, Green Belt, 2025

3.3.8 Assessing the impact of Green Belt release on the remaining Green Belt in the plan area

The PPG provides guidance of the application of the new NPPF paragraph 146 test of: *“whether the release of Green Belt land would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.”*

The PPG explains that *“in reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.”*⁹

3.3.9 Identifying sustainable locations

The PPG highlights that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a location is appropriate for development. Where grey belt land is not in a location that is or can be made sustainable, then development of that land is inappropriate. The PPG elaborates that the definition of sustainable locations should be determined for the local context, taking into account opportunities to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115.¹⁰

⁹ Paragraph: 008 Reference ID: 64-008-20250225

¹⁰ Paragraph: 011 Reference ID: 64-011-20250225

3.4 Appeal decisions

As the NPPF (2024) and Green Belt PPG (2025) have only relatively recently been published, they have yet to be tested at any Local Plan examinations. Therefore, it is helpful to look at recent planning appeals to see how they are being interpreted with respect to decision making to identify any relevant lessons learnt that can be applied to plan-making.

Before looking at recent appeals, it is helpful to reflect on more historic appeals, which have established some key points in relation to openness that are still considered relevant for GBA.

- Openness is generally considered to be ‘land free from built development,’ which should be assessed on an individual area basis as well as in terms of the cumulative impact on adjacent areas.¹¹
- Openness should be considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’ (for example, visual linkages between settlements in relation to purpose b, or functional character and linkages to the wider Green Belt in relation to purpose (c)).¹²
- While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, is not a mandatory determinative factor of openness.¹³

Following a review of around 50 recent planning appeals that have been determined since the publication of the NPPF / PPG and which featured Green Belt as a main issue, a number of key lessons have been identified:

- A site may be grey belt but if it is not in a sustainable location, its development would be inappropriate in the Green Belt.
- ‘Sustainable location’ can be defined in relation to distance from facilities and services, and access to public transport options rather than reliance on private vehicles.
- The definition of ‘large built-up areas’ and ‘towns’ within purposes assessments is significant and should align with how these places are defined within the development plan. There can be no ambiguity as to whether places are villages or towns. The definition of settlements in a settlement hierarchy has significant weight when determining what constitutes a town for Green Belt purposes.
- The footnote 7 designation does not automatically mean that a site fails the grey belt test; there needs to be a strong reason for refusal.
- Looking at strategic assessment areas or parcels within a GBA is helpful at a strategic level for plan-making. However, when considering the identification of grey belt in decision making, it is more relevant to assess at a site-specific level to

¹¹ The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

¹² See: Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin).

¹³ Further information available here: <https://www.supremecourt.uk/cases/uksc-2018-0077.html>

ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site.

- Purpose (a) is concerned with the sprawl in relation to large built-up areas only. The fact that a development would create ribbon development is not relevant to the assessment of purpose (a).
- The proportional loss of Green Belt should be considered in relation to the totality of the Green Belt within a local authority. If the proportional loss is small, it would be less likely to fundamentally undermine the Green Belt purposes, taken together.

Appendix A.1 sets out in greater detail the most significant and salient decisions from the reviewed appeals.

3.5 Experience elsewhere

Green Belt assessment should take account of good practice advice and comparator studies.¹⁴ Although no GBAs have yet been tested at Local Plan examination under the new national policy and guidance, it is still useful to understand how other local authorities have conducted GBAs to date, as key principles still apply.

Existing GBAs in other authorities, including neighbouring authorities, have therefore been reviewed, alongside gathering insights from Local Plan examinations nationally.

3.5.1 Existing Green Belt assessments

Prior to the publication of the Green Belt PPG in 2025, there had been no defined Government methodology for carrying out a GBA and local authorities took a variety of approaches. Even with the publication of the Green Belt PPG which is primarily focused on how to assess Green Belt to identify grey belt, there is only limited advice on how to conduct a full Green Belt assessment. Therefore, it is useful to understand how other authorities have approached these studies. Appendix A.2 sets out the studies reviewed.

It should be noted that the timescales for undertaking the reviewed studies predate the latest NPPF, whilst others have not been subject to Independent Examination. In identifying good practice from the approaches adopted by other authorities, these factors have been taken into account to ensure the methodology adopted is sound and reflects the latest requirements of the 2024 NPPF.

The following points were noted from the review:

- Green Belt evidence base usually comprises multiple studies. The main GBA typically takes the form of a strategic / district level assessment and a spatially focused/local level assessment. These tiered studies are typically known as Stage 1 and Stage 2 GBA. Other additional Green Belt evidence base studies can include washed over village assessments, boundary reviews and exceptional circumstances cases.

¹⁴ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

- Despite the variety of approaches, there is a good deal of commonality across GBAs, in particular assessment against the NPPF Green Belt purposes and the need to consider the essential characteristics of Green Belt, i.e. openness and permanence.
- Authorities have only used those purposes deemed relevant to context, with occasionally purpose (d) and usually purpose (e) scoped out of the assessment.
- Qualitative approaches are primarily used in assessments, although some authorities have used more quantitative methods.
- The approach to scoring in assessments varies from simplistic traffic light systems to more complex approaches. Point-scoring scales can be used, assigning scores to parcels accordingly. Typically, score ranges from three to seven are used.
- Stage 1 GBAs focus on the entirety of the Green Belt within an authority, dividing the Green Belt into strategic parcels for assessment areas. Some authorities assess the local as well as the strategic roles of the Green Belt in a Stage 1 GBA.
- Assessment areas may vary in size across GBAs, with studies often applying a minimum threshold for the size of an assessment, below which assessment areas are aggregated to avoid inadvertent assessments at a site or plot level. The minimum threshold can be a matter of judgement based on local circumstances rather than a specific figure applied rigidly.
- A Stage 1 assessment typically:
 - Considers the whole of the Green Belt within the plan area;
 - Sub-divides the Green Belt area into parcels / assessment areas based on a variety of boundary types, including durable and significant physical features, areas of similar character or land uses, or the variation in performance against the NPPF purposes;
 - Assesses the individual performance of the assessment areas against purposes (a) to (d) and applies a blanket score for purpose (e);
 - Applies qualitative measures of the performance of individual assessment areas against NPPF purposes; and
 - Does not include recommendations for further consideration by the Council.
- Stage 2 GBAs focus on particular areas of the Green Belt within an authority, dividing the land into assessment areas primarily using readily recognisable boundary features which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the assessment areas and others have used sites as submitted through the Call for Sites.
- A Stage 2 assessment typically:
 - Removes land subject to major policy constraints from consideration.
 - Assesses sub-areas/parcels/sites around existing settlements or potential new settlements (rather than the whole district).

- Considers whether there are Green Belt boundaries that are likely to be permanent and readily recognisable.
- Assess whether the removal of the assessment area would cause wider impact or harm.
- Presents overall recommendations suggesting whether or not the assessment area should be considered further.

3.5.2 Independent Examinations

Inspector's letters and reports from a range of Local Plan examinations across the country have been reviewed insofar as they relate to Green Belt methodologies.

Although they pre-date the publication of the latest policy and guidance, they nevertheless provide some useful pointers for carrying out GBA.

Key points of note are:

- A staged approach to GBA is appropriate and has been commended at examination;¹⁵
- Any methodology should clearly set out how the purposes have been interpreted, should respect the local context in relation to the definition of key terms¹⁶ and only use those purposes deemed relevant to the local context;
- Openness and permanence are key considerations in terms of Green Belt and are therefore integral to the assessment of Green Belt across all purposes;¹⁷
- A thorough approach must be taken to the identification of assessment areas for Stage 2 GBA, particularly where there is a risk that local housing need would not be met without amending Green Belt boundaries;¹⁸
- Detailed GBA (i.e. Stage 2) does not need to be carried out for land covered by major policy constraints, for example flood zone 3 or sites of international or national nature conservation importance, which would preclude development in any case;¹⁹ and
- Any specifically 'local' Green Belt purposes used in any assessment do not carry the same degree of weight as the NPPF Green Belt purposes (paragraph 143).²⁰

¹⁵ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

¹⁶ David Smith, Inspector, (24 January 2018), Report to the Council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030

¹⁷ NPPF (2021)) paragraph 137; and Mel Middleton, Inspector (December 2017) Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan.

¹⁸ See: Mel Middleton, Inspector (December 2017) Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan

¹⁹ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan.

²⁰ Mel Middleton, Inspector (December 2017) Welwyn Hatfield Local Plan Examination Green Belt Review

3.6 Implications for this study

National policy consistency:

- Green Belt policy has remained consistent in relation to fundamental aim, purposes, permanence, requirement to demonstrate exceptional circumstances before making changes, sustainable patterns of development, washed over village definition and positive planning within the Green Belt. Therefore, previous approaches to GBA are likely to be broadly still applicable. However, the development of the methodology should be cognisant of the detailed points of difference in national policy in relation to grey belt, exceptional circumstances and sequential release of Green Belt land, insofar as they are relevant to the scope of a GBA.

Stages and geographic scope:

- As well as a review of the performance of the whole of the Green Belt within Tonbridge and Malling, the PPG states that there needs to be subsequent assessment at a ‘sufficiently granular’ scale to enable the assessment of variable contribution to the Green Belt purposes, to inform the identification of grey belt.
- Authorities have typically undertaken a staged approach to Green Belt assessment, which is also supported by the PPG and has historically been supported at Local Plan examination. As such, the Stage 1 GBA focuses on the entirety of the Green Belt within an authority, dividing the Green Belt into strategic parcels for assessment. A Stage 2 GBA is then more spatially focussed. Thus, a two-stage process that firstly considers the performance of the entire Green Belt and then more granular areas of Green Belt land should be undertaken.
- Grey belt is a sub-set of Green Belt which can only be identified at that smaller scale, and hence provisional grey belt identification is most appropriately undertaken as part of the Stage 2 assessment.

Assessment process:

- Green Belt should be assessed against the purposes set out in the NPPF. The methodology must clearly set out how the purposes have been interpreted and should respect the local context, for example in relation to the definition of key terms, whilst reflecting the PPG.
- In terms of interpreting the national Green Belt purposes, definition of terms is of key importance to a successful and transparent assessment. Guidance on the interpretation of the purposes and the criteria to be used for assessment of purposes (a), (b) and (d) is provided by the Green Belt PPG. The GBA needs to establish appropriate criteria for purposes (a), (b) and (d), reflecting the illustrative factors identified in the PPG.
- The definitions of large built-up areas, neighbouring towns and historic towns used for the assessment of purposes (a), (b) and (d) respectively, are not villages. There should be no ambiguity in the definition, and the adopted definitions should align with the settlement hierarchy for the district as appropriate.
- The essential characteristics of openness and permeance should be considered within the performance assessment. Various planning appeals and the PPG have highlighted important

considerations around the interpretation and importance of ‘openness of the Green Belt,’ and these should be applied in a GBA.

- Historically some authorities have scoped out purposes (d) and (e) due to the local context, which was considered appropriate at the time. However, given the need to identify whether Green Belt release will fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan as part of the development of the exceptional circumstances case, it is necessary for the assessment of performance to cover all the purposes (a-e).
- When authorities are assessing whether an area can be removed from the Green Belt, consideration should be given to the presence or otherwise of readily recognisable and likely to be permanent boundary features. This should be considered within the Stage 2 GBA to enable authorities to refer back to the evidence later in the plan-making process, and consider potential requirements for mitigation.

Grey belt identification:

- Grey belt needs to be provisionally identified (normally within the Stage 2 GBA) as part of plan-making following the process set out in the PPG. However, not all grey belt will necessarily be allocated for development or released from the Green Belt. It will be for the Council to decide the extent to which this takes place in considering the balance of planning factors as part of the wider plan-making process.
- There is no requirement in the NPPF or the PPG for all Green Belt land to be assessed to determine whether or not it is grey belt. The implication is that grey belt identification is one component of a GBA that local authorities with Green Belt land are expected to deploy, based on local circumstances which help to determine a specific ‘area of search’ within the Green Belt.
- When identifying grey belt, the area of search should be focused on sustainable locations in line with NPPF para 155c. Within sustainable locations, the identification of grey belt will be based on the performance scores for NPPF purposes (a), (b) and (d).
- A GBA can only provisionally identify grey belt due to the need for further assessment at a later stage of the plan-making process to identify any effects on footnote 7 designations. This will confirm grey belt status or otherwise.

Amendments to Green Belt boundaries:

- Changes to Green Belt boundaries are not generally supported by the NPPF, as the general extent has already been established and give Green Belt its intended permanence. Any proposed changes will therefore need to be supported by a robust exceptional circumstances case, which is fully justified and evidenced.
- The GBA will only provide the starting point for any exceptional circumstances case, and it will be necessary for the Council to develop the exceptional circumstances case further, both at strategic and site level, as part of the wider Local Plan process.
- The new ‘fundamentally undermine’ test that has been introduced will need to be set out as part of any exceptional circumstances case. Although the development of such a case lies outside the scope of this methodology, high-level conclusions of what constitute

‘fundamentally important’ parcels for Green Belt purposes should be drawn at Stage 1, to inform this case later in the plan-making process, once the combination of sites for release are known.

- When considering the ‘fundamentally undermine’ test, considering the proportional loss of total Green Belt within the district is likely to be helpful.

4. Assessment Methodology

4.1 Overview

The following section details the two-stage GBA methodology, as illustrated in Figures 3 and 4. While some aspects of the methodology differ at each stage to account for the different scales of assessment, the assessment of the five NPPF purposes and definition of key terms applies to both. Therefore:

- Section 4.2 provides an overview of the purposes assessment; followed by
- Sections 4.3 and 4.4 which outline the specific methodological steps which apply to the Stage 1 and Stage 2 studies (including grey belt identification).

Local authorities hold a clear duty to cooperate on strategic issues, such as Green Belt. The potential release of any Green Belt land within Tonbridge and Malling may also impact on the role of the Green Belt in adjoining authority areas as part of the wider London Green Belt. As a result, it is important to engage with neighbouring authorities on the proposed methodology and Green Belt parcels for assessment.

Duty to Cooperate engagement on the proposed methodology for the Stage 1 and Stage 2 GBA, including grey belt identification, was undertaken by the Council. The comments received and the associated responses are summarised in Appendix A.4.

4.2 Assessment against NPPF Purposes

The intention of the assessment is to establish any differentiation in terms of how the assessment areas in the existing Green Belt function and fulfil the NPPF Green Belt purposes.

Each of the assessment areas was assessed against the purposes of Green Belt, as set out in the NPPF. The Green Belt PPG (2025) provides guidance on how to assess purposes (a), (b) and (d) and the guidance was used to inform assessment criteria for those purposes. No national guidance exists for purposes (c) and (e) and the assessment criteria for these purposes were based on previous experiences, best practice and recent examples. In both cases and where possible, consideration was given to the need to respect local circumstances and the unique characteristics that affect the way the NPPF Green Belt purposes are appraised.

Openness and permanence are essential characteristics of Green Belt; and were therefore integral to the assessment of Green Belt across all purposes. Openness was considered not only in terms of a 'volumetric approach' (i.e. physical coverage of built form) but also in terms of 'visual elements'.

For each purpose, one or more criteria were developed using both qualitative and quantitative measures. A score was attributed for each criterion (Table 1). If, following detailed analysis, an assessment area was considered to have no contribution to a specific purpose, a statement was added to the pro-forma to this effect.

Different numerical scales were used across purposes to account for the varying degrees of difference in characteristics assessed within them. Previous experience indicates the difference in numerical scales can be helpful in terms of informing spatial strategy as appropriate. It avoids a 'one size fits all' approach but still seeks to accord with the 'strong / moderate / weak or none' hierarchy set out in the PPG.

It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes was undertaken.

Figure 4 Stage 1 GBA methodology diagram

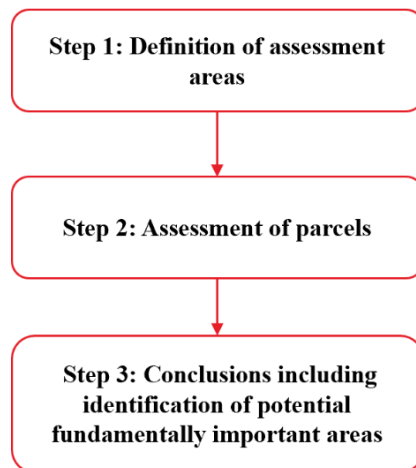


Figure 3 Stage 2 GBA methodology diagram

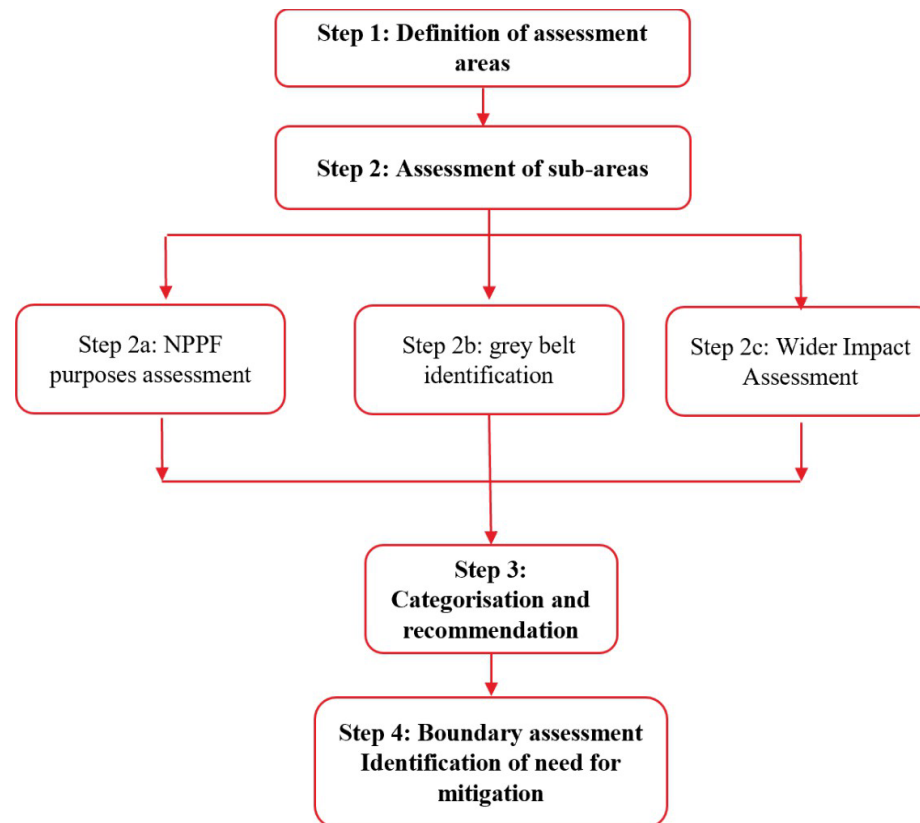


Table 1 Criterion Scores

Overall strength of Green Belt assessment area against criterion	Score	Equivalent Wording
	5	Meets criterion strongly
	4	Meets criterion relatively strongly
	3	Meets criterion moderately
	2	Meets criterion relatively weakly
	1	Meets criterion weakly
	0	Does not meet criterion

The following sections examine the definition of each of the five purposes of the Green Belt in relation to local context; and set out the criteria and scoring applied.

4.2.1 Purpose (a)

Purpose (a): To check the unrestricted sprawl of large built-up areas

The original strategic purpose of the Metropolitan Green Belt was to check the sprawl of London. However, it is recognised that the wider Green Belt also plays a role in preventing the unrestricted growth of other large built-up areas, where they are of sufficient scale. This assessment will therefore consider the role of Green Belt assessment areas in preventing the sprawl of large built-up areas of relevance in the Tonbridge and Malling context.

National policy provides some guidance over what might constitute ‘large built-up areas’ by stating that ‘*Villages should not be considered large built-up areas*’ (Green Belt PPG, paragraph 005). The PPG, updated in 2025, provides guidance for the interpretation of Green Belt policy, which has used the term ‘large built-up area’ for many years but had never previously provided any specificity on what could or could not be considered a large built-up area. On this basis, it is difficult to justify what might or might not be a large built-up area subsequent to the PPG update on the basis of pre-2025 precedents and/or definitions in case law and appeals.

While one potential solution could be to assume everywhere defined as a ‘town’ for purpose (b) is also a ‘large built-up area’ for purpose (a), this would, however, overlook the fact that the Government specifically chose to retain here the term ‘large-built up area’ (rather than ‘town’). On this basis, this study has assumed that not all settlements identified as towns will necessarily be equivalent to large built-up areas.

To ensure a robust and comparable definition of large built-up areas, Office for National Statistics (ONS) data provides a helpful starting point to identify built-up areas based on population ranges as shown in Table 2. Settlements within Tonbridge and Malling Borough and neighbouring local planning authorities which fell within the ‘large’ and ‘major’ classes were considered as the starting point for identifying large built-up areas for the purpose of this study.

Table 2 Built-up area (BUA) size classification

Population range (usual resident population)	BUA size classification	Approximate settlement type
0 – 4,999	minor	hamlet or village
5,000 - 19,999	small	larger village / small town
20,000 – 74,999	medium	medium towns
75,000 – 199,999	large	large towns / smaller cities
200,000+	major	cities

Source: Office for National Statistics

However, while size thresholds were taken as useful proxy to identify large built-up areas, local context was also taken into account. The identification of large built-up areas were confirmed through consideration of individual district settlement hierarchies and through discussion with officers from TMBC and neighbouring authorities. The final list of large built-up areas is shown in Table 3 and illustrated in Figure 6. Some places within neighbouring local planning authorities which fall within the ‘large’ and ‘major’ classes were also considered large built-up areas for the purpose of this study.

Table 3 Large Built-Up Areas relevant for purpose (a) assessment

Tonbridge and Malling	Neighbouring Local Authorities
None	Gravesend and Northfleet urban area (Gravesham) Gillingham, Chatham, Rochester and Strood urban area ²¹ (Medway) Maidstone (Maidstone)

No settlement in Tonbridge and Malling is considered a large built-up area for the purpose of this study because the population of the largest built-up area, Tonbridge, is recorded by ONS as 36,125 and thus well below the threshold of 75,000 used by the ONS to define large built-up areas.

Purpose (a) means that Green Belt should function to protect open land at the edge of large built-up areas from unrestricted sprawl. The extent to which an assessment area prevents unrestricted sprawl is dependent on:

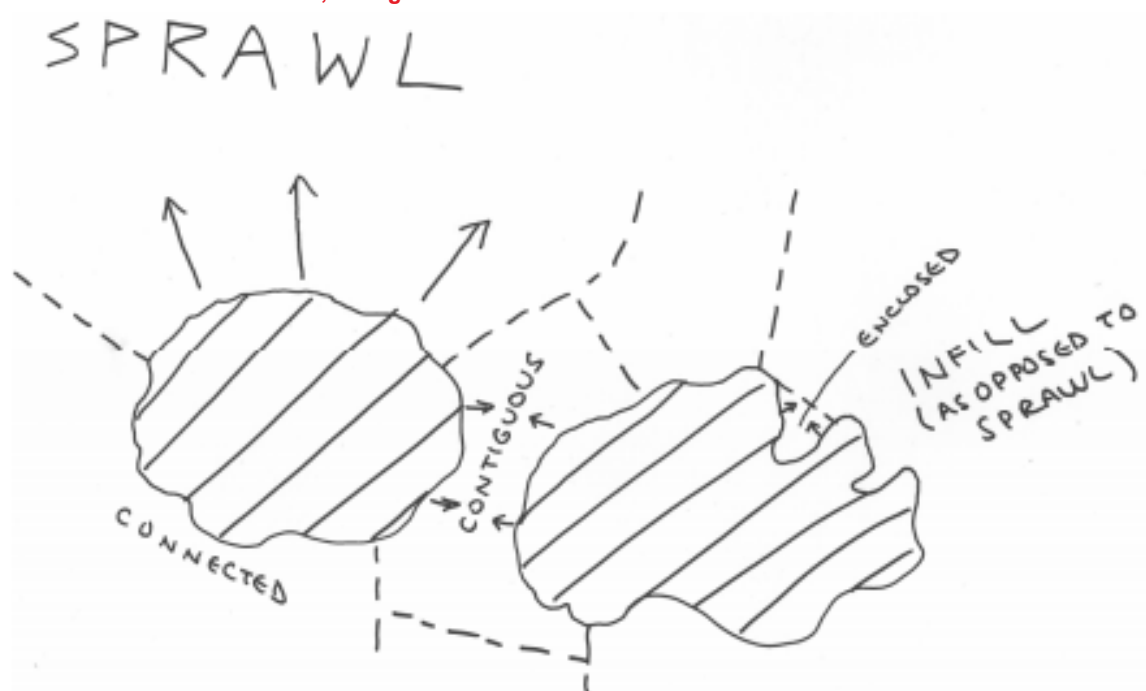
- Whether it is adjacent or near to the built-up area- consideration should be given to whether it is physically, visually or functionally linked to a large built-up area.
- If it were to be developed, the extent to which it would result in an incongruous pattern of development (such as an extended ‘finger’ of development into the Green Belt).
- Presence of physical feature(s) in reasonable proximity that could restrict and contain development. Consideration should be given to whether there are prominent man-made or natural physical features (i.e. motorway, A-road, railway line, major river or significant

²¹ Commonly referred to as ‘the Medway Towns’ but not to be confused with the separate built-up area (in Tonbridge and Malling) commonly referred to as ‘the Medway Gap’ towns (Aylesford, Ditton, East Malling, Larkfield and Leybourne).

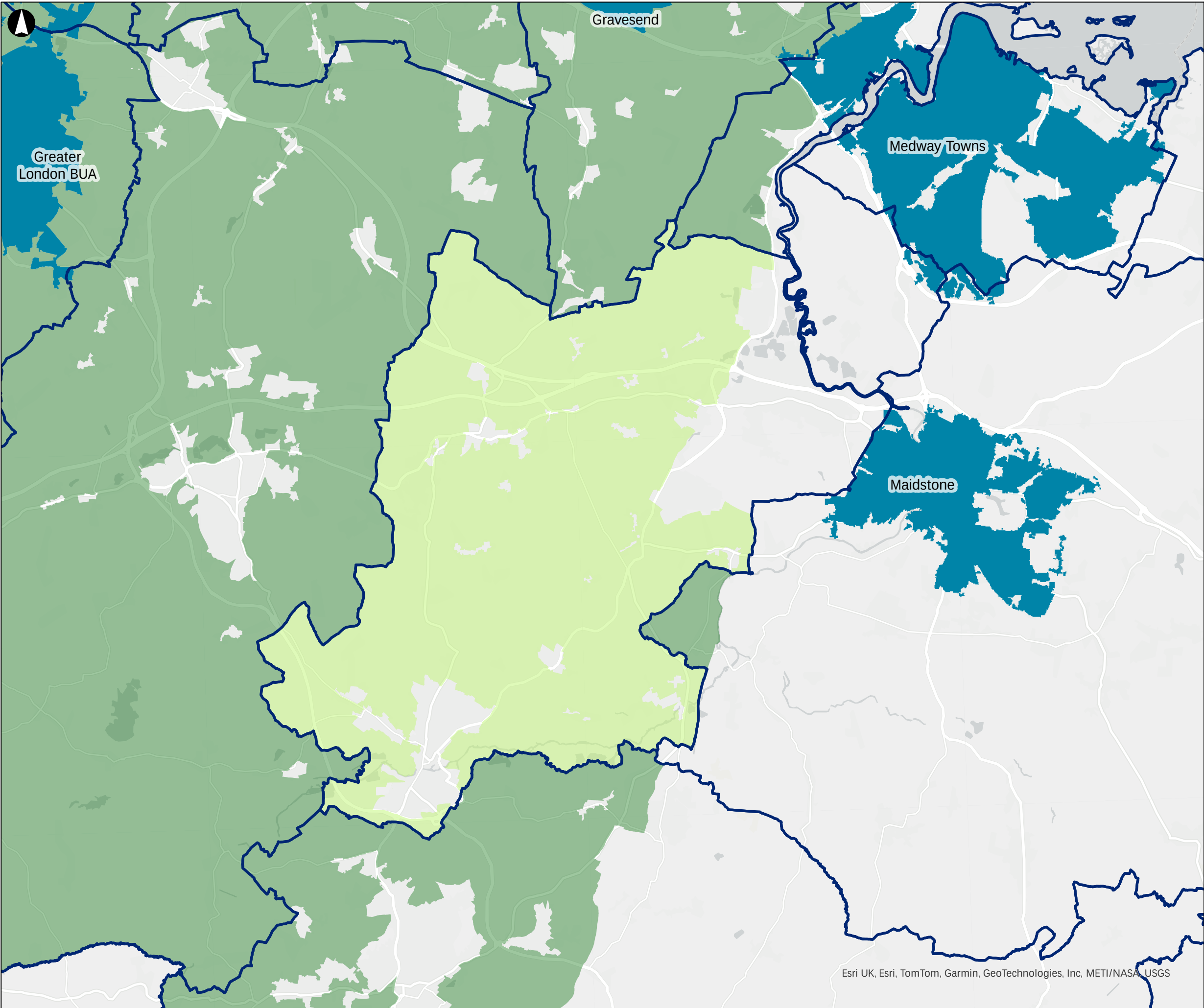
topographical feature) that might restrict the scale of outward growth of the settlement and regularise potential development form.

- Its relationship with the respective built-up area(s), in particular the degree / nature of containment by built form. Assessment areas that are almost entirely surrounded by built development as part of a single built-up area (enclosed) do not prevent sprawl; rather potential development could be classified as infill (Figure 5). However, assessment areas between two built-up areas (contiguous) or on the edge of one built-up area (connected) have a role in preventing sprawl.

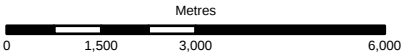
Figure 5 Illustration of connected, contiguous and enclosed



- Degree of openness, i.e., the extent to which an assessment area already contains built development. If the assessment area is fully developed, it does not meet the basic aim of Green Belt (NPPF paragraph 142).
- Whether the assessment area is subject to other urbanising influences.



- Large Built-up Areas considered for purpose (a) assessment
- Local Authority Boundaries
- Neighbouring Green Belt
- Tonbridge & Malling Green Belt



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Project Name
Tonbridge & Malling Green Belt Assessment

Drawing Title
Figure 6: Large Built-up Areas considered for Purpose (a) assessment

Scale at A3
1:120,000

Role

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Suitability

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Project Number

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Rev

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Drawing Number

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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

Table 4 Purpose (a) assessment criteria

Criterion	Score	Description ²²
Land parcel is located at the edge of a large built-up area ²³	YES	The sub-area is located at the edge of a large built-up area with physical or perceptual connections to it.
	NO	The sub-area is not located at the edge of a large built-up area in physical or perceptual terms.
Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another defensible boundary	5	Assessment area is contiguous with two or more large built-up areas. The assessment area is likely to be free of existing development and / or other urbanising influences. OR Assessment area is connected to a large built-up area. The assessment area is likely to be free of existing development and / or other urbanising influences. There are no prominent physical features along the edge of the existing settlement and in reasonable proximity to the outer edge of the assessment area to prevent disproportionate / incongruous pattern of development.
	4	Assessment area is connected to a large built-up area. The assessment area is likely to be free of existing development and / or other urbanising influences. There are no prominent physical features in reasonable proximity to the outer edge of the assessment area to prevent disproportionate / incongruous pattern of development, however the inner edge of the existing settlement comprises a prominent physical feature.
	3	Assessment area is partially enclosed or connected to a large built-up area. The assessment area is likely to contain some existing development and / or other urbanising influences. There are prominent physical features in reasonable proximity to the outer edge of the assessment area to prevent disproportion / incongruous pattern of development. However, the inner edge of the existing settlement does not comprise a prominent physical feature.
	2	Assessment area is partially enclosed or connected to a large built-up area. The assessment area is likely to contain some existing development and / or other urbanising influences. There are prominent physical features in reasonable proximity to the outer edge of the assessment area and along the edge of the existing settlement to prevent disproportion / incongruous pattern of development.
	1	Assessment area is enclosed by a large built-up area. The assessment area may contain some existing development and/or other urbanising influences.
	0	Assessment area is not at the edge of a large built-up area, in physical or perceptual terms, and does not meet purpose (a). OR Assessment area contains significant existing development.

²² In cases where a sub-area falls within a location that could be defined as both connected or contiguous **and** enclosed, its score would be determined on a case-by-case basis depending on the context. In some cases, it may be more appropriate for an area in such a context to be defined as infill and in others as contiguous- depending on the relationship of the sub-area with the edge of the large built-up area.

²³ This yes/no criterion applies only to the Stage 2 assessment, and is not applied in the Stage 1 assessment.

4.2.2 Purpose (b)

Purpose (b): To prevent neighbouring towns merging into one another

Purpose (b) considers the role that the Green Belt plays in preventing neighbouring towns from merging into one another. The assessment considered gaps between towns in the Borough, and towns in surrounding local authorities.

National policy provides guidance over what might constitute ‘towns’ by stating that ‘*This purpose relates to the merging of towns, not villages*’ (Green Belt PPG, paragraph 005).²⁴

As such, a definition of towns for the purposes of this assessment needed to be developed. The definition took into account a number of relevant factors, including the Council’s emerging settlement hierarchy, neighbouring local authorities’ adopted or emerging development plans, including their settlement hierarchies where available, and the professional judgement and local knowledge of TMBC and neighbouring authority officers. In all cases, settlements classified as villages within the settlement hierarchies and/or development plans reviewed have not been included as towns for purpose b).

All large built-up areas identified for purpose (a) assessment purposes have been additionally identified as towns. Large built-up areas have not been subdivided into constituent towns for purpose (b) assessment purposes, as it is considered that the official boundaries between contiguous settlements are not generally identifiable on the ground.

Only neighbouring towns within close proximity of Sevenoaks boundary and which could form a gap with a Sevenoaks town were included in the assessment, as listed in Table 5 and illustrated in Figure 7.

Table 5 Towns relevant for purpose (b) assessment

Tonbridge and Malling	Neighbouring Local Authorities
Borough Green	Gravesham
Kings Hill	Gravesend and Northfleet Urban Area
Medway Gap urban area (Aylesford, Ditton, East Malling, Larkfield, Leybourne and Lunsford Park)	Maidstone
Snodland	Maidstone
Tonbridge and Hilden Park ²⁵	Medway
Walderslade ²⁶	Chatham
West Malling	Gillingham
	Rochester
	Strood
	Sevenoaks²⁷
	Sevenoaks
	Kemsing
	West Kingsdown

²⁴ It should therefore be noted that Purpose (b) applies only to Green Belt land separating two towns, not a town from a village or any other settlement (however defined).

²⁵ Hilden Park is a detached suburb of Tonbridge, so for settlement hierarchy purposes, the two are considered a single town.

²⁶ Part of the Medway Towns and/or Chatham which lies within Tonbridge and Malling.

²⁷ As advised by Sevenoaks District Council, this reflects the emerging Sevenoaks Local Plan settlement hierarchy rather than the adopted hierarchy. The Sevenoaks urban area is defined as Sevenoaks Town including Bessels Green, Chipstead, Dunton Green and Riverhead, as defined by the settlement boundary. This list aligns with that used within Sevenoaks’ own emerging Green Belt evidence.

Tunbridge Wells

Royal Tunbridge Wells

Paddock Wood

Southborough

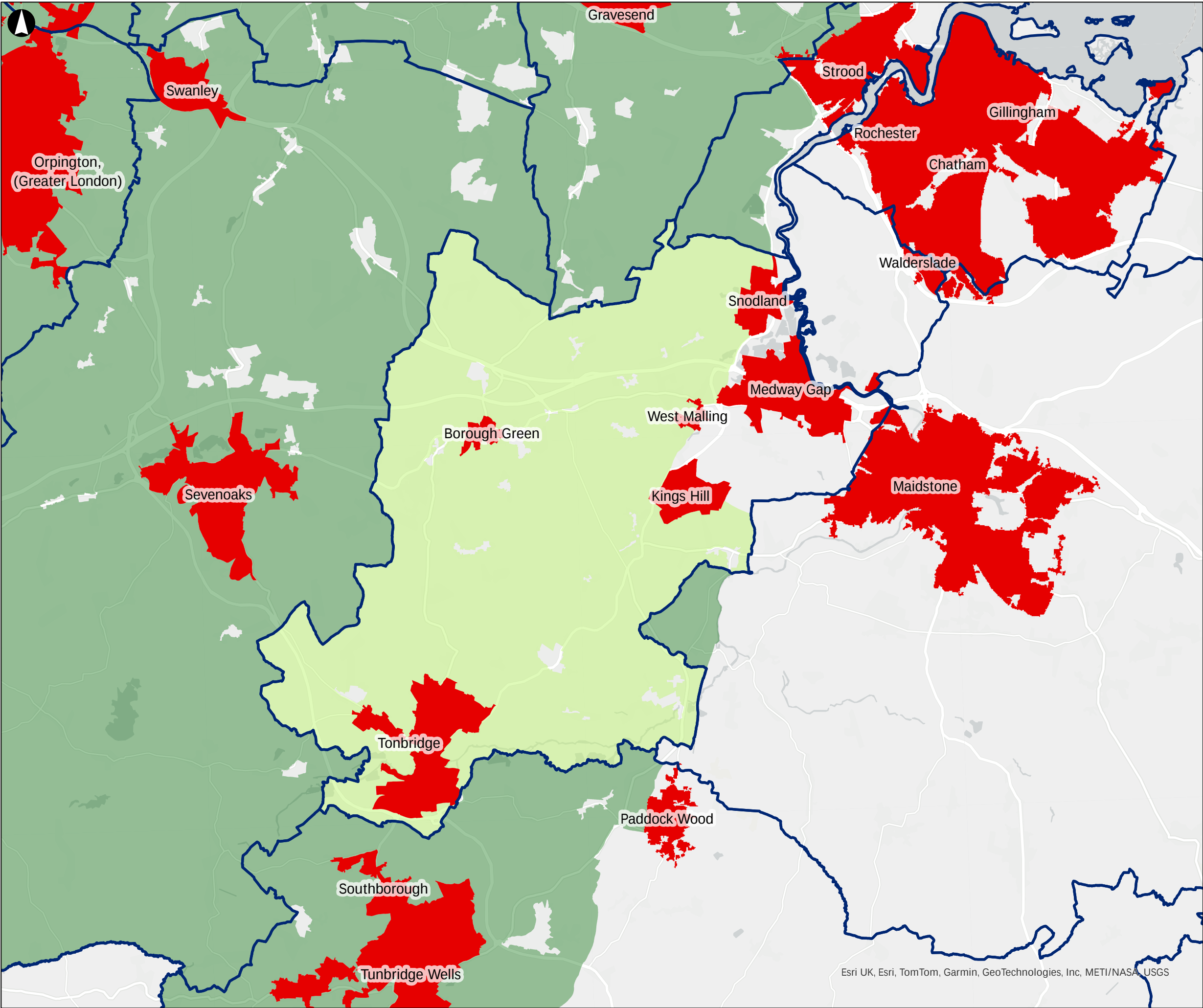
Source: Tonbridge and Malling Borough Council, Gravesham Borough Council, Maidstone Borough Council, Medway Council, Sevenoaks District Council, Tunbridge Wells Borough Council

The purpose (b) criterion considers the extent to which assessment areas protect a gap and prevent towns from merging through sprawl or ribbon development. The extent to which an assessment area prevents towns merging is dependent on:

- Its relationship with towns and whether it lies within a gap between neighbouring towns;
- Degree to which development of an assessment area would reduce the perceived or physical distance between towns;
- Presence of physical feature(s) in reasonable proximity that would visually or physically prevent the coalescence of neighbouring towns. Consideration should be given to whether there are prominent man-made or natural physical features (i.e. motorway, A-road, railway line, major river or significant other topographical feature) that will influence the degree to which visual separation will be maintained;
- Degree of openness, i.e., the extent to which an assessment area already contains built development or is subject to other urbanising influences. If the assessment area is fully developed, it does not meet the basic aim of Green Belt in any case (NPPF paragraph 142).

Table 6 Purpose (b) Assessment Criterion

Criterion	Score	Description
Restricts development that would result in merging of or significant erosion of the gap between neighbouring towns.	5	Assessment area forms a substantial part of a gap, where development would significantly visually or physically reduce the perceived or physical distance between towns.
	3	Assessment area forms a small part of a gap, where there is scope for some development without visually or physically reducing the perceived or physical distance between towns.
	1	Assessment area forms a very small part of a gap, where development would not visually or physically reduce the perceived or physical distance between towns.
	0	Assessment area does not form part of a gap between towns.



- Towns considered for purpose (b) assessment
- Local Authority Boundaries
- Neighbouring Green Belt
- Tonbridge & Malling Green Belt



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Client
Tonbridge & Malling Borough Council

Project Name
Tonbridge & Malling Green Belt Assessment

Drawing Title
Figure 7: Towns considered for Purpose (b) assessment

Scale at A3
1:120,000

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Suitability	--
Project Number	Rev
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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

4.2.3 Purpose (c)

The approach to purpose (c) considered the extent to which Green Belt has maintained the openness and character of the countryside, and avoided extensive and/or irregular sprawl²⁸ and urbanising influences (thus broadly reflecting the NPPF term ‘encroachment’). It should be noted that assessment of purpose (c) does not form part of the grey belt assessment.

The interpretation of purpose (c) for this study has therefore considered openness (in terms of extent of existing built development which may encroach on the sense of spatial and visual openness due to urbanising influences), sprawl (which, by definition, encroaches on previously undeveloped countryside, all the more so when extensive and/or irregular), and the degree to which the Green Belt can be characterised as countryside, given that some development, such as motorways, allotments, residential gardens, playing fields and golf courses do not necessarily impact on openness but are nevertheless urbanising influences.

The score attributed to each assessment area is based on a qualitative assessment of character from site visits, including the sense of openness within the assessment area and within neighbouring land, both inside and outside the Green Belt.

To aid in this assessment, the percentage of built form within the assessment area was calculated using GIS tools based on the land area of manmade (constructed) features as classified by Ordnance Survey MasterMap data. This data includes buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures, but excludes roads, railway lines and other urbanising influences that keep land open.

The term ‘countryside’ typically refers to land beyond a defined settlement boundary and which does not comprise built development (other than for rural uses such as buildings for agriculture and forestry). For purpose (c), the assessment considered the degree to which an assessment area can be characterised as having a rural (as opposed to urban) character. When drawing conclusions on the character of assessment areas, the following were considered:

- Development (other than for agriculture and forestry) reducing the openness of land, as set out in the OS MasterMap-defined built form;
- Whether there were any urban influences or managed uses in addition to those identified in the OS MasterMap-defined built form, such as other areas of paving, urban or suburban- style gardens, allotments, motorways, playing fields and golf courses. Such development is not considered inappropriate in the Green Belt by national policy, because it does not reduce openness. However, it nevertheless constitutes an urbanising influence relative to more rural land uses such as agriculture and forestry.
- Morphology – the shape, scale, distribution and regularity of any built form and the pattern of development within the assessment area. Typically, a more dispersed built form contributes to a more rural character while a denser built form contributes to a more urban character.
- Sense of openness and containment based on urbanising influences on neighbouring land, whether inside or outside the Green Belt; and
- Topography of the assessment area and its influence on visual perception.

The following categorisation of assessment area character were used²⁹:

²⁸ For more details on the definition of sprawl for the purposes of this study, refer to text under purpose (a).

²⁹ It should be noted that because the categorisation of assessment area character focusses to a significant extent on the character of the assessment area itself, it is possible for an assessment area to be judged as strongly unspoilt rural or strongly rural even if it is subject to urbanising influences outside the site itself.

- ‘Strongly unspoilt rural character’ - land characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields;
- ‘Strongly rural character’ - land characterised by rural land uses and landscapes, but with a proportion of dispersed development and man-made structures;
- ‘Largely rural character’ - land largely characterised by rural land uses and landscapes but with more regular dispersed development and man-made structures;
- ‘Semi-urban character’ - land that contains a mixture of urban and rural land uses. These uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, and/or low density development more generally associated with urban areas (e.g. residential or commercial); and
- ‘Urban character’ - land that is dominated by higher density urban land uses, including physical developments such as residential or commercial uses, or urban managed parks.

Table 7 Purpose (c) assessment criterion

Criterion	Score	Description ³⁰
Protects the openness of the countryside and is least covered by development.	5	Assessment area contains less than 3% built form and/or possesses a strongly unspoilt rural character
	4	Assessment area contains less than 5% built form and/or possesses a strongly rural character.
	3	Assessment area contains less than 10% built form and/or possesses a largely rural character
	2	Assessment area contains less than 15% built form and/or possesses a semi-urban character.
	1	Assessment area contains more than 15% built form and/or possesses an urban character.
	0	Assessment area contains more than 20% built form and/or possesses an urban character

4.2.4 Purpose (d)

Purpose (d): To preserve the setting and special character of historic towns

Purpose (d) considers the extent to which an assessment area protects land in the immediate

³⁰ Note that the Stage 1 assessment does not consider percentage coverage by built form, given the more strategic scale of assessment area, whereas Stage 2 assessment considers both elements of the criterion.

and wider context of a historic town.

National policy provides guidance over what might constitute ‘historic towns’ by stating that *‘this purpose relates to historic towns, not villages’* (Green Belt PPG, paragraph 005).

Historic towns have therefore been defined as settlements considered towns under purpose (b), and which have a historic significance. Within Kent and Medway, as agreed with TMBC officers, historic towns were identified through the 2006 Archaeology in Historic Towns³¹. Although the study is dated, it is still considered a reasonable source given that historic assets typically tend to be enduring. Where it was clarified that parallel Green Belt evidence was being developed that took a slightly different approach, for example in Medway and Sevenoaks, that approach was taken into account.

Historic towns have been defined, both within Tonbridge and Malling Borough and neighbouring authorities as follows (Table 8, Figure 8).

Table 8 Neighbouring Local Authorities

Tonbridge and Malling	Neighbouring Local Authorities
Tonbridge	Gravesend and Northfleet (Gravesham)
West Malling	Maidstone (Maidstone)
	Rochester, Chatham, Strood ³² (Medway)
	Sevenoaks, New Ash Green ³³ (Sevenoaks)
	Royal Tunbridge Wells (Tunbridge Wells)

The following aspects are of particular importance with regard to assessment of Green Belt against purpose (d):

- The role of the assessment area in providing a setting for the historic town, in particular the presence of historic features within or adjacent to the assessment area itself;
- The extent of other existing development within the assessment area;
- The contribution of the assessment area to the special character of a historic town, as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town;
- Consideration of the visual, physical and experiential relationship to historic aspects of the town, including views or vistas between the historic town and the surrounding countryside; and
- Whether there is any separation from historic elements of the town through intervening development or topography.

³¹ Kent and Medway Supplementary Planning Guidance ‘Archaeology in Historic Towns’ July 2006

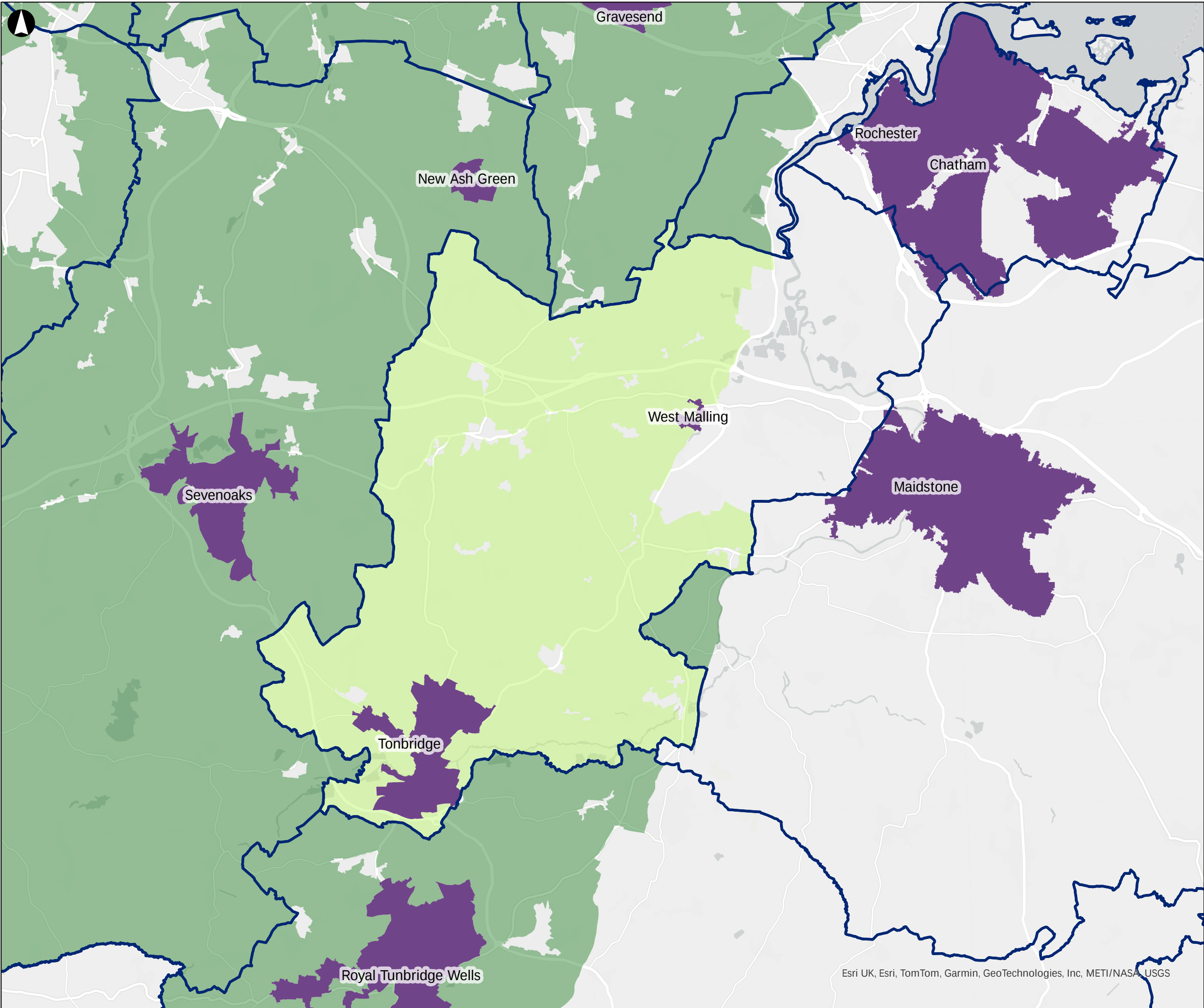
³² Although Strood is not included as a historic settlement in the Kent and Medway Supplementary Planning Guidance ‘Archaeology in Historic Towns’ July 2006, Medway Borough Council advise its inclusion as such with regard to its relationship with the River Medway, which provides an experiential aspect of the setting for Rochester as a historic town.

³³ Although New Ash Green is not included as a historic settlement in the Kent and Medway Supplementary Planning Guidance ‘Archaeology in Historic Towns’ July 2006, Sevenoaks District Council advise its inclusion as such on the basis of its unique historical identity (largely intact) as a prototype for a new way of living from the 1960s onward.

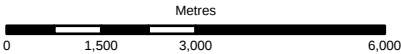
Table 9 Purpose (d) Assessment Criterion

Criterion	Score	Description
Protects land which provides immediate and wider context for a historic town, including views and vistas between the town and surrounding countryside.	5	Assessment area plays an important role in maintaining the setting of a historic town and/or makes a considerable contribution to the special character of a historic town.
	3	Assessment area plays a role in maintaining the setting of a historic town and/or makes a contribution to the special character of a historic town.
	1	Assessment area has a limited role in maintaining the setting of a historic town and/or makes little contribution to the special character of a historic town.
	0	Assessment area does not form part of the setting of a historic town and makes no contribution to the special character of a historic town. ³⁴

³⁴ It should be noted that a score of zero remains possible even at the edge of a settlement defined as a historic town, depending on the factors set out in the bullet points above Table 9.



- Historic Towns considered for purpose (d) assessment
- Local Authority Boundaries
- Neighbouring Green Belt
- Tonbridge & Malling Green Belt



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Rev	Date	By	Chkd	Appd	Authd
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Client
**Tonbridge & Malling Borough
Council**

Project Name
**Tonbridge & Malling Green Belt
Assessment**

Drawing Title
**Figure 8: Historic Towns considered
for Purpose (d) assessment**

Scale at A3
1:120,000

Role

Suitability

Project Number

Rev

Drawing Number

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Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

4.2.5 Purpose (e)

Purpose (e) focuses on assisting urban regeneration through the recycling of derelict and other urban land.

Assessment of areas against purpose (e) is unlikely to lead to a differentiation between areas as it is difficult to attribute urban regeneration to a particular area of Green Belt. Rather, it is the designation of all areas collectively as Green Belt which encourages, or should encourage, the recycling of derelict and other urban land. As such, it is not possible to differentiate the assessment of purpose (e) by individual assessment areas. Nevertheless, it is important to retain purpose (e) as an overarching assessment to inform the later ‘fundamentally undermine’ test required by NPPF paragraph 146. The performance of the Green Belt against this purpose has therefore been assessed for the Green Belt in Tonbridge and Malling as a whole and does not form part of the Stage 1 or Stage 2 area assessments. Nevertheless, it is important to consider purpose (e) in respect of the Green Belt to inform the later ‘fundamentally undermine’ test required by NPPF paragraph 146.

The question therefore becomes how to assess the performance of the Green Belt against purpose (e) for Tonbridge and Malling, if not by parcel/ sub-area. In considering this question, numerous local and national datasets considered relevant to purpose (e) were reviewed, noting that there is no single dataset demonstrating ‘the recycling of derelict and other urban land.’ It is also noted that, while purpose (e) is relevant to all development, in practice, the only accurate datasets allowing direct or indirect measurement of purpose (e) performance cover dwellings completions only, which therefore has to be used as a proxy for all development.

The list of datasets considered potentially relevant and subsequently reviewed is as follows:

- Brownfield land register since 2018 (i.e. since they became mandatory)³⁵
- Annual housing targets and/or assessed need over the same period³⁶;
- Percentage of total new dwellings on Green Belt land over the same period³⁷; and
- Percentage of total new dwellings on previously developed land over the same period.³⁸

Some information in these datasets overlaps, but this is not problematic given that this was a qualitative rather than quantitative exercise and datasets were not considered mutually exclusive.

Detailed review of the datasets indicated that while all may be indirectly relevant to purpose (e) assessment, in practice, only the percentage of new dwellings on Green Belt land can be used as a direct proxy for purpose (e) performance³⁹. While this may at first appear counterintuitive, given the purpose (e) wording of ‘derelict and other urban land’, i.e. the exact opposite of development on Green Belt land, it works because the purpose of the exercise is to understand the extent to which Green Belt land is being developed because it indicates the extent to which non-Green Belt land (i.e. derelict and other urban land) is being developed.

³⁵ Available on the Council’s website

³⁶ Available in the Authority Monitoring Report on the Council’s website

³⁷ Available at <https://www.gov.uk/government/statistics/land-use-change-statistics-2021-to-2022>, Table P311

³⁸ Ibid.

³⁹ The data measures dwelling completions on Green Belt land, rather than commitments; the former is considered more robust because the latter may or may not have resulted in development taking place.

The other datasets do not provide sufficient clarity on this criterion. For example, while the percentage of dwellings on PDL could in theory act an indicator of activity levels in terms of ‘the recycling of derelict and other urban land’, the data does not indicate what proportion of this PDL is on Green Belt versus urban land. Likewise, the brownfield land registers show peaks and troughs in brownfield capacity over time, suggestive of the ‘recycling of derelict and other urban land’ but does not directly indicate the extent to which the Green Belt is playing a role in this process. This is because, as for the PDL data, some brownfield sites may themselves lie in the Green Belt. Similarly, while annual housing targets and/or assessed need is important in its own right, it has no direct relationship with the function of the Green Belt, albeit that indirectly, higher housing targets are more likely to require development within the Green Belt.

By contrast, as explained previously, reviewing the percentage of new dwellings on Green Belt land in Tonbridge and Malling is directly relevant to how the Green Belt is performing on Purpose (e)- even allowing for the fact that other factors (discussed below) also play a role in the extent of Green Belt development. This dataset collated by MHCLG for all Green Belt authorities in England, which at the time of writing this report was only available for the years between 2014 and 2022⁴⁰, takes three-year averages to minimise outlier figures. It is set out in It is clear from this data that Tonbridge and Malling, and the wider Green Belt authorities in Kent have consistently higher levels of development on Green Belt land compared to the average across all Green Belt authorities in England. A multitude of reasons could underpin this trend in addition to national Green Belt policy, including:

- Age of Local Plans, whereby speculative development can take advantage of the so called ‘tilted balance’ when an LPA cannot demonstrate a five-year housing land supply;
- Amount of Green Belt land within the LPA area compared to amount of brownfield or greenfield land outside the Green Belt available for (re-) development; and/or
- Level of demand for residential and other development within an LPA area.

Table 10 Percentage of new dwellings on Green Belt land, 2014-2022

Year	% of total new dwellings on Green Belt land		
	Tonbridge and Malling	Kent and Medway Green Belt Authorities Average	England Green Belt Authorities Average
2014	18.2	7.9	3.2
2015	18.2	7.9	2.9
2016	18.2	7.9	2.3
2017	16.1	7.4	2.6
2018	16.1	7.4	2.8
2019	16.1	7.4	2.5
2020	11.5	6.2	2.8

⁴⁰ Consistent data for years outside this range does not appear to be available. While it could be collated for more recent years AMRs, there could be inconsistencies and, most importantly, the England Green Belt authorities’ average figure would not be available as a benchmark.

2021	11.5	6.2	2.3
2022	11.5	6.2	2.5

It is clear from this data that Tonbridge and Malling, and the wider Green Belt authorities in Kent have consistently higher levels of development on Green Belt land compared to the average across all Green Belt authorities in England. A multitude of reasons could underpin this trend in addition to national Green Belt policy, including:

- Age of Local Plans, whereby speculative development can take advantage of the so called ‘tilted balance’ when an LPA cannot demonstrate a five-year housing land supply;
- Amount of Green Belt land within the LPA area compared to amount of brownfield or greenfield land outside the Green Belt available for (re-)development; and/or
- Level of demand for residential and other development within an LPA area.

Table 11 New residential dwellings on Green Belt Land

Year	% of total new dwellings on Green Belt land		
	Tonbridge and Malling	Kent and Medway Green Belt Authorities Average	England Green Belt Authorities Average
2014	18.2	7.9	3.2
2015	18.2	7.9	2.9
2016	18.2	7.9	2.3
2017	16.1	7.4	2.6
2018	16.1	7.4	2.8
2019	16.1	7.4	2.5
2020	11.5	6.2	2.8
2021	11.5	6.2	2.3
2022	11.5	6.2	2.5

Source: Table P311: Proportion of new residential addresses created within land designated as Green Belt by local authority, England, 2013-14 to 2021-22, at <https://www.gov.uk/government/statistics/land-use-change-statistics>

The Tonbridge and Malling average percentage of new dwellings on Green Belt land at 12-18% is significantly greater than the 6-8% average for Kent and Medway and the 2-3% for the England Green Belt authority average. For this reason, the entire Tonbridge and Malling Green Belt (and all its constituent assessment areas) has been assigned a score of 1 (weak performance) against Purpose (e). This score applies both at Stage 1 (all parcels) and Stage 2 (all sub-areas).

The assessment areas score weakly because the evidence indicates that, relative to Green Belt authorities elsewhere in England, the Tonbridge and Malling Green Belt is likely playing a much more limited role in encouraging the recycling of derelict and other urban land; in other words,

for a range of reasons, more Green Belt land is being developed than the England Green Belt authority average.

While this assessment has been made on the basis of past performance rather than future projections, as the former is considered more robust, it is important to note that it is a snapshot in time and might change in future based on the factors discussed or indeed others. It seems most likely that Green Belt performance on purpose (e) in Tonbridge and Malling could improve in the future if an up to date Local Plan was in place, albeit that the introduction of grey belt as an ‘easier to develop’ subset of Green Belt could affect these figures unless grey belt dwelling completion monitoring is clearly disaggregated (as it should and could be) from the Green Belt monitoring process.

Other factors that could improve performance in future, but are considered less likely, include amendment or removal of the ‘tilted balance’ policy nationally, or a sustained decline in demand for housing and other development across London and/or South-East England.

4.3 Stage 1 Green Belt assessment methodology

4.3.1 Overview

This section sets out the methodology used to undertake the Stage 1 GBA. This encompassed an assessment of the whole of the Green Belt within Tonbridge and Malling, in line with the national guidance that ‘when identifying assessment areas, authorities should consider all Green Belt within their Plan areas in the first instance’⁴¹.

The assessment of the performance of Green Belt land at Stage 1 aims to provide a strategic, high-level understanding of the performance of the Green Belt across the whole Borough and does not seek to identify potential boundary alterations. National guidance states that ‘authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary’⁴². This is the role of a Stage 2 GBA. As such, the Stage 1 GBA did not identify grey belt land and instead sought to ascertain:

- Whether all land designated fulfils the Green Belt purposes; and
- The degree of ‘fundamental importance’ attached to various parts of the Green Belt in strategic terms. This is necessary to build evidence supporting the Council in undertaking the ‘fundamentally undermine’ test (NPPF paragraph 146) needing to be set out as part of any Exceptional Circumstance case.

The overall process followed to undertake the assessment is summarised in Figures 3 and 4 earlier in this document.

4.3.2 Step 1: Definition of assessment areas

The Stage 1 assessment comprises the whole of the Green Belt within Tonbridge and Malling, noting national guidance that ‘*when identifying assessment areas, authorities should consider all Green Belt within their Plan areas in the first instance*’.⁴³

⁴¹ Green Belt PPG 2025, paragraph 004 Reference ID: 64-004-20250225

⁴² Green Belt PPG 2025, paragraph 004 Reference ID: 64-004-20250225

⁴³ Green Belt PPG 2025, paragraph 004 Reference ID: 64-004-20250225

The assessment of the performance of Green Belt land at Stage 1 is based on large assessment areas called ‘parcels’ for the purpose of this study. The scale of parcels to be assessed seeks to strike a balance between providing a strategic overview of the Green Belt and sufficient granularity to enable the assessment of the parcels’ variable contribution to Green Belt purposes. Each parcel was given a numerical designation.

The parcels were defined using emerging TMBC Landscape Character Areas (LCAs)⁴⁴ as a starting point. It is important to emphasise, however, that Green Belt is **not** a landscape designation – it is a policy designation. The purposes for including and maintaining land within the Green Belt do not take landscape quality into account and this assessment followed that approach. LCAs are merely one of a number of possible ways of dividing the Tonbridge and Malling Green Belt into parcels for assessment purposes- their use neither infers nor requires any landscape considerations to be taken into account. Landscape evidence and policy for Tonbridge and Malling will be progressed separately from the Green Belt Assessment.

Landscape Character Areas were selected as they provide a useful basis as for a Stage 1 parcels in the following ways, by:

- Providing a uniform open or enclosed character across a parcel, which provides a good basis for the assessment against Green Belt purposes.
- Using key topographical and physical features to characterise the parcels which are visually recognisable on the ground; and
- Comprising areas broadly appropriate in size for the purposes of strategic Green Belt assessment relative to alternative options.

The identified parcels do not extend beyond the Borough boundaries, which is helpful in terms of ensuring no overlap with GBA conclusions in neighbouring local authority areas.

Some LCA parcels were split by intervening urban area boundaries into two or more parts. Where this was the case, the individual parts were given a letter designation showing that they were part of a larger parcel (e.g. 23a, 23b and so on) and referred to, where necessary, as ‘sub-parcels’.

The parcels used for Stage 1 assessment are illustrated in Figure 9. It should be noted that Figure 9 contains no colour coding. The colours are those used in the original Landscape Character assessment simply for the purpose of clearly differentiating assessment parcels. The numbers, however, refer to the parcel number for the purposes of Stage 1 Green Belt assessment.

4.3.3 Step 2: NPPF Purpose assessment

The methodology used to undertake the performance assessment of the parcels against NPPF Green Belt purposes (a) – (d) is covered in Section 4.2. As explained in sub-section 4.2.5, purpose (e) was not considered in this assessment as the whole Green Belt performs uniformly against the purpose and does not distinguish performance between the different parcels. A pro-forma was prepared to capture the assessments of each parcel against each Green Belt purpose. The assessments were based on desk research using relevant evidence sources, including LCA assessment, calculations of built form coverage based on OS MasterMap data, aerial and topographical images and mapping, information from TMBC officers, and, where appropriate and relevant, information from the original 2016 Stage 1 GBA being replaced, with the caveat that assessment area boundaries (based on parishes) differed significantly.

⁴⁴ Not yet available online.

Where Stage 1 parcels were divided into two or more parts, the assessment reviewed both the overall LCA performance across all Green Belt purposes but also commented, where necessary, on how this performance differed by individual parcel part. For parcels divided into two or more parts, overall performance score for the parcel on each Green Belt purpose was determined based on the highest score achieved by any single part of it.

This approach ensures that strong performance in one part is not masked by weaker performance in another part and is consistent with the scoring for Stage Two assessment, where, similarly, overall performance against all Green Belt purposes is based on the score of the strongest performing purpose. The Stage Two assessment, for parts of each parcel where land is available and suitable, can then provide further granularity in terms of Green Belt performance.

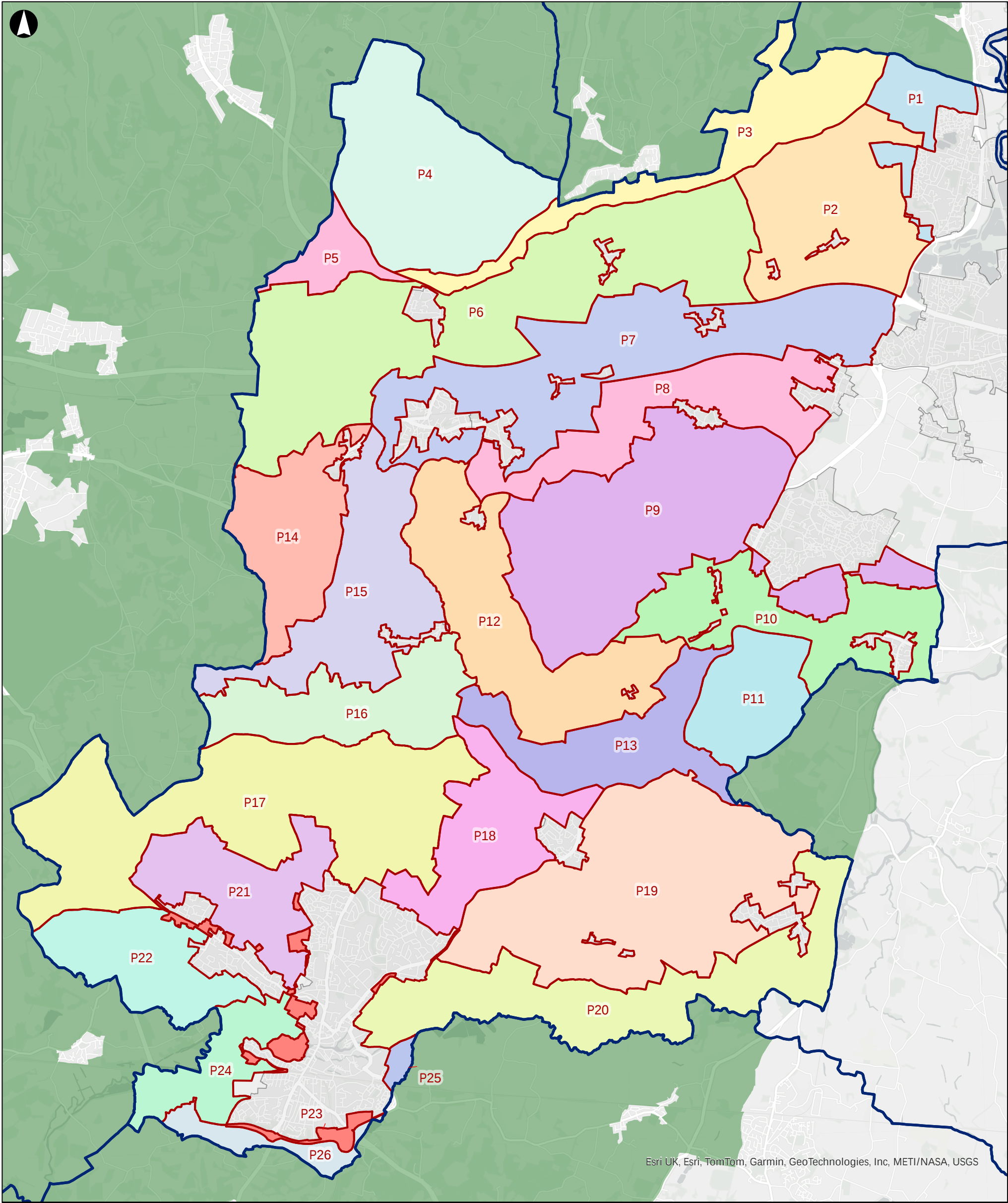
4.3.4 Step 3: Identifying areas of fundamental importance

Once assessment of all parcels was complete, results were aggregated and examined further to understand whether any areas of Green Belt land within Tonbridge and Malling could be judged to be of fundamental importance to the Tonbridge and Malling Green Belt as a whole with regards to purposes (a) – (e).

The purpose of this further analysis was to identify emerging areas of ‘fundamental importance’ in terms of Green Belt purposes. Such areas can be defined as parts of the Green Belt- whether a single parcel or a cluster of two or more adjoining parcels– performing particularly strongly against a specific purpose. These areas were highlighted on maps and conclusions/recommendations clearly detailed in accompanying text.

The overall purpose of this final Stage 1 exercise was to provide relevant evidence supporting TMBC when it comes to performing its ‘fundamentally undermine’ test (NPPF paragraph 146) for the purposes of demonstrating exceptional circumstances for the alteration of Green Belt boundaries.

Note that the test itself can only be performed once Stage 2 is completed, because the evidence it relies on comes from both a strategic GBA (Stage 1) and the more granular assessment of Stage 2. However, it makes logical sense for the strategic- level evidence informing it to be set out at the conclusion of Stage 1 because this is when it first emerges.



Proposed Stage 1 Parcels
Settlements

Neighbouring Green Belt
Local Authority Boundaries

Metres
0 500 1,000 2,000

--	Jun 25	WJ	JH	KK	--
Rev	Date	By	Chkd	Appd	Authd

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Client
Tonbridge & Malling Borough
Council

Project Name
Tonbridge & Malling Green Belt
Assessment

Drawing Title
Figure 9: Stage 1 Green Belt
Parcels for Assessment

Scale at A3
1:65,000

Role
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Suitability
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Project Number
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Drawing Name
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4.4 Stage 2 Green Belt Assessment methodology

This section sets out the methodology for undertaking the Stage 2 GBA. The methodology complements and takes further the Stage 1 GBA, providing a finer-grained assessment of Green Belt performance to feed directly into TMBC decision making on potential amendments to the Green Belt boundary.

Stage 2 entails taking the Stage 1 parcels and breaking them down into smaller areas. For clarity, these smaller areas are henceforth referred to as ‘sub-areas’ to distinguish them from the larger Stage 1 parcels.

Although sub-areas are defined in locations where it is known land is available for development (i.e. through the Council’s Call for Sites), sub-area boundaries are deliberately not the same as site boundaries. This allows for consistency of assessment by ensuring that all assessment areas have (or have potential to have) boundaries meeting the requirements of NPPF paragraph 149⁴⁵), which would enable them potentially to be released from the Green Belt.

The assessment against the NPPF purposes alone forms the basis of the grey belt identification.

4.4.1 Overview

The primary aim of the Stage 2 assessment was to determine the extent of differentiation, if any, in terms of how Green Belt sub-areas function and their performance against the purposes of the Green Belt- in other words, the same NPPF Paragraph 143 test as for Stage 1 but at sub-area level, where the performance and results tends to differ. Stage 2 assessment, again in common with Stage 1, also considers the role of sub-areas with respect to the wider Green Belt to understand the potential impact(s) of removing them from the Green Belt. Stage 2 then concludes with recommendations to the Council as to whether the sub-area should be considered for release.

The recommendations at the conclusion of Stage 2 are based partly on whether the sub-area can be identified as grey belt, which depends on its performance on the NPPF purposes. The Stage 2 recommendations align with the PPG, which makes clear that just because an area of Green Belt is identified as grey belt, it does not automatically follow that it should be allocated for development or released from the Green Belt.

Like all Local Plan evidence, the Stage 2 GBA needs to be robust and thorough, but also proportionate. It therefore considers only sub-areas containing Green Belt sites promoted to TMBC for development through the three Call for Sites exercises (the most recent concluding in 2025), and which occur in locations considered to be sustainable by the Council- a judgement relying on relevant NPPF paragraphs (see below) and local knowledge and experience. This ensures that any land eventually considered for Green Belt release and hence allocated in the Local Plan will pass the NPPF tests of being both suitable and available for development.

This approach aligns with NPPF paragraphs:

- 72(a), which requires that planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period;
- 72(b), which requires specific, developable sites or broad locations for growth, for years 6-10, and where possible, for years 11-15 of the plan; and

⁴⁵ For further details, see below.

- 148, which states that 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 NPPF paragraphs 110⁴⁶ and 115⁴⁷.

On this basis, one or more areas of search need to be defined at the start of Stage 2 because, unlike Stage 1, it does not consider the entirety of the TMBC Green Belt.

The overall process followed to undertake the assessment is summarized in Figure 3 above and detailed below. Figure 10 shows promoted sites within the Green Belt submitted to the Council and, within this group, those which were judged to be in sustainable locations for the purposes of this Assessment.⁴⁸

4.4.2 Step 1: Definition of sub-areas

Given that Stage 2 provides a finer-grain assessment feeding more directly than Stage 1 into decision making on potential amendments to the Green Belt boundary, specific areas of search need to be defined.

The sub-areas were defined using a four-stage process:

- Identify area(s) of search;
- Refine area(s) of search through review and filtering of promoted sites and Stage 1 findings;
- Apply major policy constraints filter (see NPPF footnote 7);
- Define sub-area boundaries.

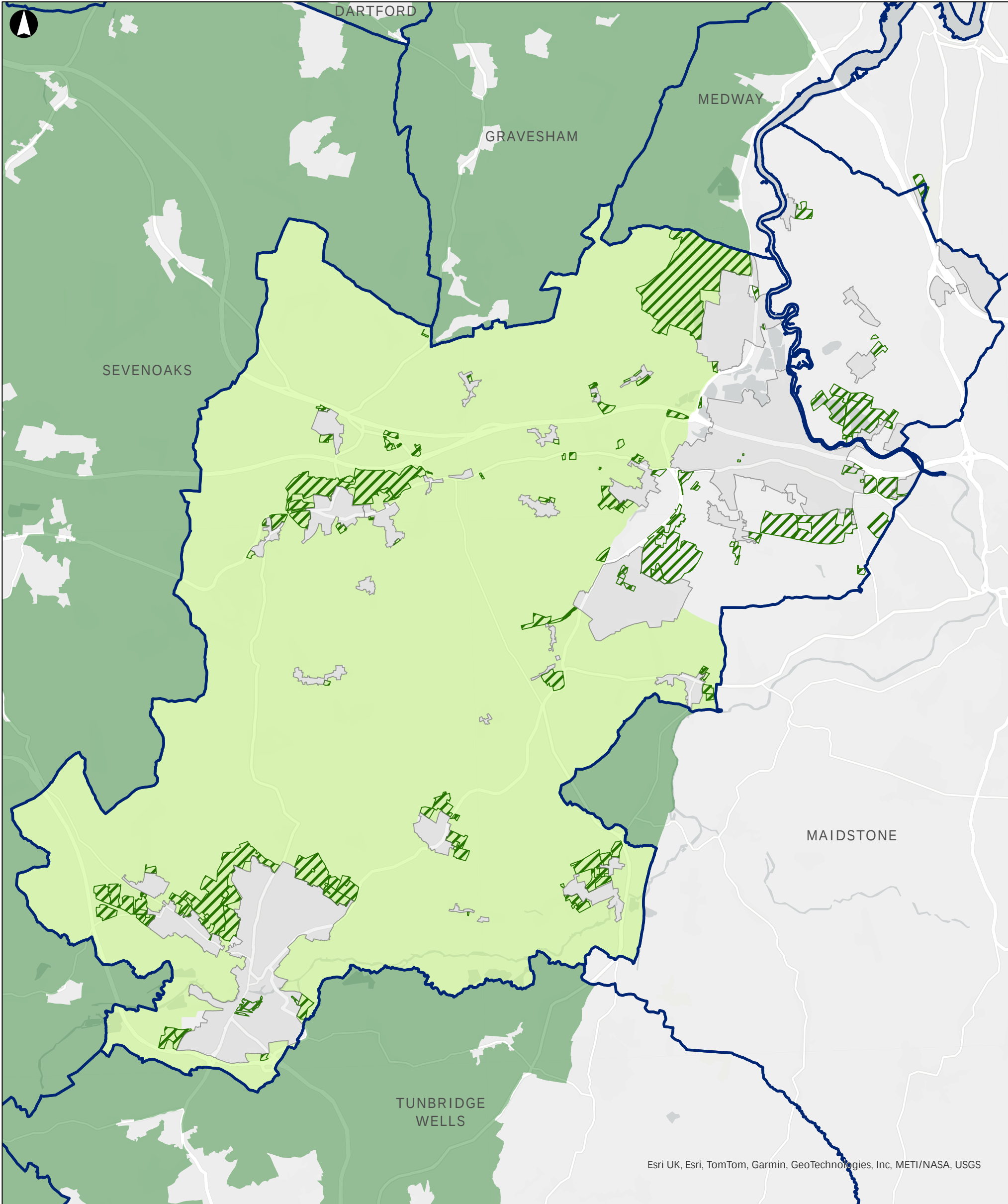
Identify Area(s) of Search

The area of search was focussed largely on existing settlements within Tiers 1-4 in the emerging settlement hierarchy (Table 12); as well as other sustainable locations- comprising land around railway stations in the Green Belt but away from existing settlements due to access to public transport, and land around motorway junctions (which may be suitable for employment allocations due to easy access to the strategic road network). The reason for focus on these specific places was to ensure growth could be focussed in the most sustainable locations, in line with NPPF paragraphs 110 and 115.

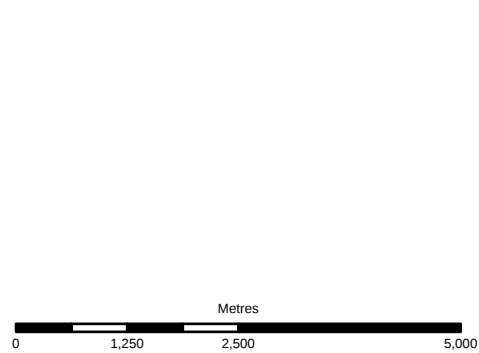
⁴⁶ The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

⁴⁷ 'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.'

⁴⁸ The promoted sites shown on Figure 10 are those as submitted to TMBC by developers/site promoters and do not represent the boundaries of potential allocations in the Local Plan. Figure 10 also shows promoted sites in sustainable locations within settlements, as shown in the subsequent Figure 11, these were subsequently filtered out for the purposes of Green Belt assessment as they do not comprise Green Belt land.



Land Identified by TMBC as
having potential for allocation
within the Local Plan



Tonbridge & Malling Green Belt
Neighbouring Green Belt
Local Authority Boundaries
Settlements

--	Jun 25	WJ	JH	KK	--
Rev	Date	By	Chkd	Appd	Authd

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Client
Tonbridge & Malling Borough
Council

Project Name
Tonbridge & Malling Green Belt
Assessment

Drawing Title
Figure 10 Sites promoted to the
Council for development

Scale at A3
1:85,000

Role
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Suitability
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Project Number
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Drawing Name
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Rev
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Table 12 Settlements and other locations in the Borough considered for the purpose of identifying sub-areas for the Stage 2 assessment⁴⁹

Settlement by tier	Other sustainable locations
Tier 1 (Principal Service Centres)	Hildenborough Station
Tonbridge and Hilden Park	M20 Junction 4 (as potential location for employment development)
Medway Gap towns	M26 Junction 2a (as potential location for employment development)
Tier 2 (Service Centres)	
Borough Green	
Kings Hill	
Snodland	
West Malling	
Tier 3 (Primary Villages)	
East Malling	
East Peckham	
Hadlow	
Hildenborough	
Wateringbury	
Tier 4 (Secondary Villages)	
Birling	
Hale Street	
Ightham	
Leybourne Chase	
Mereworth and Herne Pound	
Platt	
Plaxtol	
Ryarsh	

⁴⁹ Except where otherwise stated, all settlements were considered for their suitability for wholly residential or residential-led development.

Snoll Hatch	
Wrotham	
Tier 5 (Other Villages)	
Wrotham Heath	

Refine area(s) of search through review

To ensure a sustainable development pattern, and to avoid creating ‘holes’ in the Green Belt, only land promoted to the Council for development within sub-areas adjacent to (or which could be made adjacent to) settlements were considered further, irrespective of the settlement’s position in the settlement hierarchy.⁵⁰ This aligns with the approach taken in the GBAs of comparable local authorities, including Tunbridge Wells, Gravesham, Dacorum and Hertsmere.

Bearing in mind again that the GBA is an evidence base rather than a policy document, the consideration of a site and/or sub-area within it should not be taken as an indication that this land is necessarily the most sustainable, suitable or deliverable option for any future allocation or development. GBA assessments of sub-areas considered to perform less well against the Green Belt purposes and/or as less important within the context of the wider Green Belt still need to be balanced against other Local Plan evidence to inform a preferred spatial growth option.

The relationship between Stage 1 parcels identified for further consideration due to their poor performance against Green Belt purposes and the Stage 2 sub-areas was also considered.

Apply major policy constraints filter

A filtering process was undertaken to remove areas or sites, which were entirely or largely constrained by major policy constraints, which effectively rule out development of the land.

The following ‘major’ policy constraints were used (illustrated in Figure 11):

- Flood zone 3 (land with a high probability of flooding);
- Sites of Special Scientific Interest (SSSI); and
- Special Areas of Conservation (SACs).

Define sub-area boundaries

Once the area(s) of search were determined and the major policy constraints filter applied, the boundaries of individual sub-areas needed to be defined. As the boundary of any sub-area may, in time, become the new boundary of the Green Belt itself, if that sub-area is released, boundary definition followed NPPF paragraph 149 (f), which requires Green Belt boundaries to be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’.

The sub-area boundaries were therefore defined using a range of specific boundary features (Table 13). In locations where readily recognisable and permanent boundary features were absent, sub-

⁵⁰ In some cases, this required certain sub-areas to be defined covering land which had not itself been promoted for development, but which would need to be released from the Green Belt if adjacent land promoted for development were deemed suitable for release. This was necessary in locations where, if release occurred, negative impacts on the remaining nearby Green Belt had potential to be thus mitigated; in non-technical terms, seeking to avoid the inadvertent formation of Green Belt ‘islands’ or ‘holes’.

area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent.

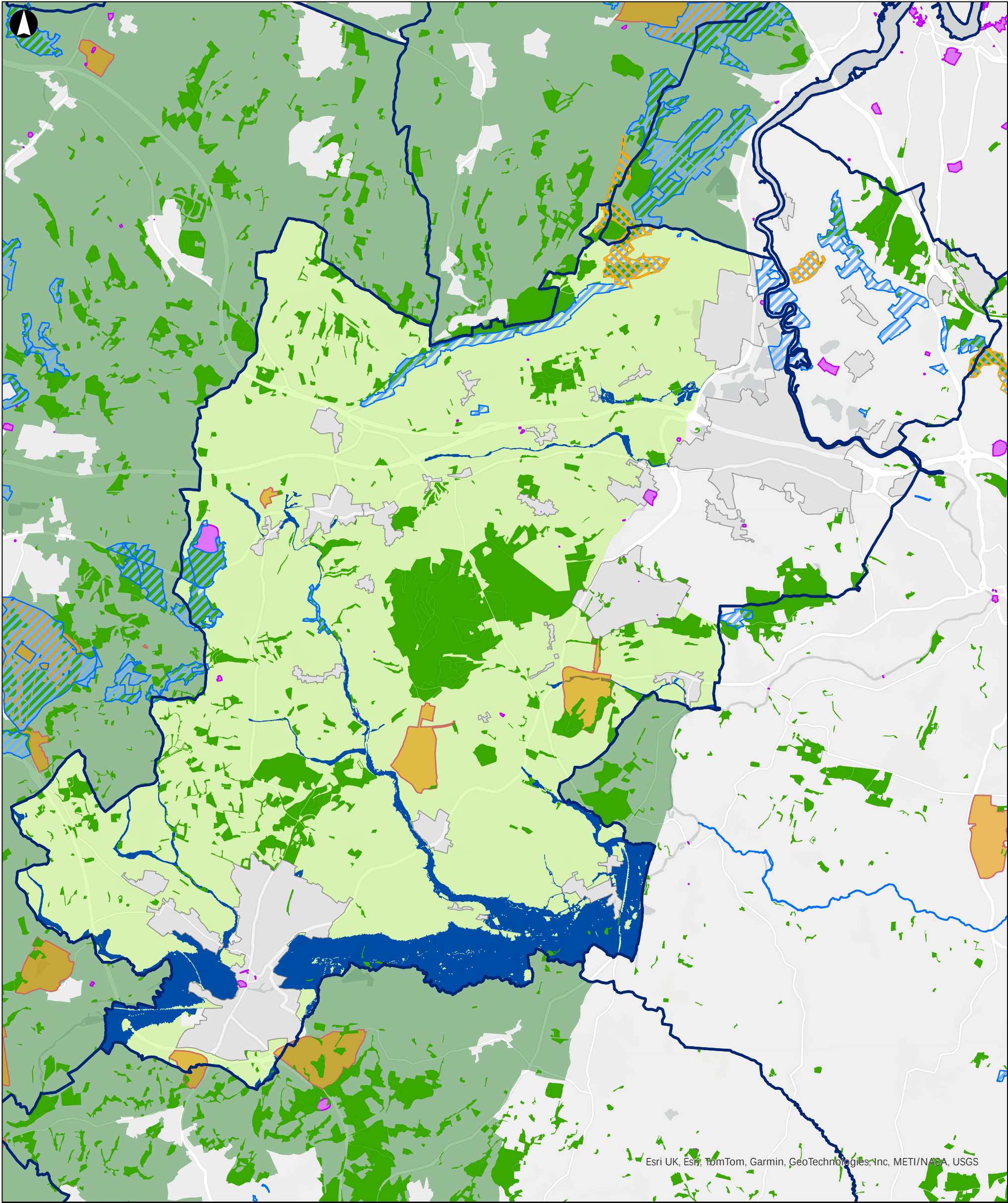
Table 13 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Features
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and/or hedgerows
Natural ‘buffer’ features such as ridgelines	

Sub-area boundaries were initially defined through desktop assessment of publicly available data, including aerial photography, Ordnance Survey maps, ‘birds eye’ views and Google Earth. A final relevant consideration in the definition of sub-areas was the location and extent of the Green Belt sites promoted to the Council; the sub- area boundaries were defined so as not to cut across the boundaries of promoted sites, ensuring that each site promoted to the Council sat within, and was assessed as part of, a wider sub-area.

In cases where a sub-area was found not to be contributing to the Green Belt purposes in the NPPF and/or making a less important contribution to the wider Green Belt, the whole sub-area, including but not limited to the promoted site, may be recommended for release from the Green Belt. Conversely, it may be recommended for retention if found to be performing strongly against the purposes and/or making an important contribution to the wider Green Belt. It does not, however, follow that, in cases where sub-area release is recommended, the whole of the sub-area might be developed, because the sub-area land beyond the boundary of the promoted site(s) may not be available for development.

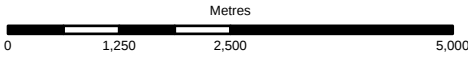
Following boundary definition, each sub-area was then assigned a unique reference number. Boundaries were subsequently refined as necessary based on observations during site visits, using professional judgement, to reflect any characteristics or features not apparent from desktop review. Figure 12 presents the final sub-areas used in Stage 2. Close-up maps of sub-areas by settlement can be found in Appendix A.5.



Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

-  Sites of Special Scientific Interest
-  Special Areas of Conservation
-  Ancient Woodland
-  Scheduled Ancient Monuments
-  Registered Parks and Gardens
-  Flood Zone 3

-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Local Authority Boundaries
-  Settlements



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Rev	Date	By	Chkd	Appd	Authd

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Client
Tonbridge & Malling Borough Council

Project Name
Tonbridge & Malling Green Belt Assessment

Drawing Title
Figure 11 Major Policy Constraints

Scale at A3
1:85,000

Role

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Suitability

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Project Number

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Drawing Name

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Rev

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4.4.3 Step 2: Site Visits

Step 2a: NPPF purpose assessment

The methodology used to undertake the assessment of the performance of the sub- areas against the NPPF Green Belt purposes at Stage 2 is identical to that at Stage 1 and has therefore already been covered in Section 4.2 above. As explained in sub- section 4.2.5, purpose (e) was not considered in this assessment as the whole Green Belt performs uniformly against the purpose, meaning performance cannot be distinguished between differing sub-areas. Pro-formas were prepared to capture the assessments against each purpose for the Green Belt sub-areas.

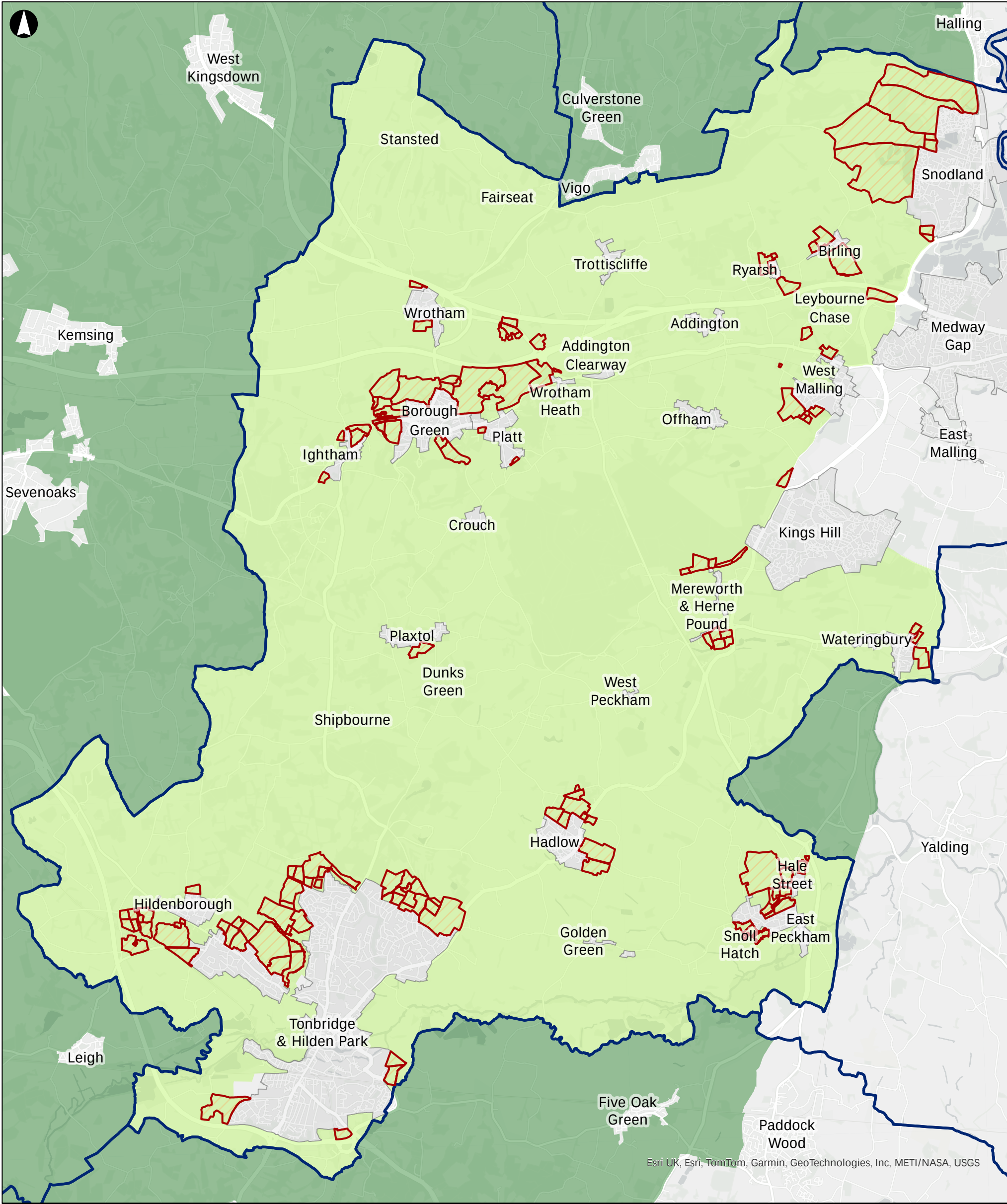
At Stage 2, the assessment process involved a mixture of evidence from desk-based research (including contextual information and secondary data sources such as aerial photography, Bing maps and Google Streetview), supported by primary evidence obtained through site visits.

All sub-areas were visited to understand more clearly their immediate context, character and boundary features, and to refine the initial analysis. Photographs of all sub-areas were taken from publicly accessible land (where access and views permitted) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt and adjacent settlement(s). The photographs were used as aide-memoires for assessors and for illustration of key points for Assessment readers as well as for assessment purposes per se. If it was not possible to obtain site photographs, or if only limited photographs could be taken, aerial photography was used as supplementary illustration. The site visits concluded in Spring 2025.

Overall NPPF purpose performance

Overall performance against the purpose assessment criteria for each sub-area was determined as follows:

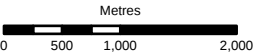
- Any sub-area scoring strongly (a score of 4 or 5) against the criteria for one or more NPPF purpose was judged to meet the purpose assessment criteria strongly.
- Any sub-area scoring moderately (3) against at least one NPPF purpose and failing to score strongly or very strongly (4 or 5) against any purpose was judged as meeting the purpose assessment criteria moderately.
- Any sub-area scoring weakly (1 or 2) across all NPPF purposes was judged to meet the purpose assessment criteria weakly.



Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

-  Sub-areas for Assessment
-  Settlements

-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Local Authority Boundaries



--	Jun 25	WJ	JH	KK	--
Rev	Date	By	Chkd	Appd	Authd

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Client
Tonbridge & Malling Borough Council

Project Name
Tonbridge & Malling Green Belt Assessment

Drawing Title
Figure 12 Stage 2 sub-areas

Scale at A3
1:65,000

Role
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Suitability
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Project Number
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Rev
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Drawing Name
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Step 2b: Grey belt identification

The NPPF makes clear that the grey belt comprises any Green Belt land that is judged not to strongly contribute to any one of purposes (a), (b), or (d) and that is not restricted by the application of policies in NPPF footnote 7. The NPPF also makes clear that grey belt can include both previously developed land⁵¹ (itself defined in the NPPF) and other Green Belt land, but for the purposes of this assessment stage, no distinction need be made between these two types of grey belt.

Provisional identification

The results of the Stage 2 GBA purposes assessment were filtered to isolate sub-areas which do not contribute strongly to any one of purposes (a), (b), or (d). This land was identified as provisional grey belt.

Confirmation of status

As defined in the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. In reaching this judgement, the PPG states that authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. For the purposes of grey belt identification, Footnote 7 constraints are listed in Table 14.

Since step 1 of the Stage 2 GBA involved a filtering process to remove areas or sites, which were entirely or largely covered by major policy constraints (which were considered to effectively rule out development of the land) some of the footnote 7 constraints were already excluded in drawing the sub-areas. These major constraints are also noted in Table 14 below.

The analysis contained within the GBA only forms only part of the footnote 7 judgement. Therefore, the Council should review whether the application of policies relating to footnote 7 would provide a strong reason for refusing or restricting development once more detail is known for sites later in the plan-making process. Once this final exercise has been completed, the Council will be able to confirm grey belt status.

Table 14 NPPF Footnote 7 Constraints

Footnote 7 constraint	Stage 2 definition of assessment areas - major constraint filter	Stage 2 grey belt identification – additional major constraint filter
Habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest (1)	Sites of Special Scientific Interest (SSSI) Special Areas of Conservation (SACs)	None (already filtered out)
Local Green Space, a National Landscape, a National Park (or within the Broads Authority); or defined as Heritage Coast (2) (3)		National Landscape
Irreplaceable habitats (4)	Ancient Woodland	None (already filtered out)

⁵¹ Note that previously developed land in the Green Belt may not necessarily be identifiable as grey belt in cases where Footnote 7 applies to it.

Designated heritage assets (and other heritage assets of archaeological interest referred to in NPPF footnote 75) (5)	Scheduled Monuments Registered Parks and Gardens	Conservation areas Listed buildings Non-designated heritage assets of archaeological interest
Areas at risk of flooding or coastal change (3)	Flood zone 3 (land with a high probability of flooding)	None (already filtered out)

Note (1): Tonbridge and Malling does not contain any Special Protection Areas (SPAs), Ramsar sites, National Park, Registered Battlefields or World Heritage Sites.

Note (2) There are no Local Green Spaces designated within the Local Plan or within made Neighbourhood Plans to date. There is no National Park within Tonbridge and Malling.

Note (3) As an inland authority, Tonbridge and Malling has no heritage coastline, no Protected Wreck Sites, and neither is it at risk of coastal change.

Note (4) Irreplaceable habitats in Tonbridge and Malling include ancient woodland; there are no Mediterranean saltmarsh scrubs or *Spartina* saltmarsh swards⁵². Veteran trees are not referenced in Footnote 7 and hence have not been determined to form a major constraint filter for the purpose of identifying provisional grey belt.

Note (5) Footnote 75 states “Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets”

Step 2c: Assessment of impacts on the wider Green Belt

This final step of assessment comprised an appraisal of the sub-area’s role and importance in terms of the function of the wider Green Belt. In this context, the term ‘wider Green Belt’ refers to the land designated as Green Belt immediately surrounding the sub-area, which may or may not include other sub-areas.

In cases where this step logically would include other sub-areas, for example where there were one or more sub-areas immediately adjacent to the sub-area being assessed, the sub-area could be assessed as part of a cluster or clusters of sub- areas in combination.

These qualitative assessments considered the following questions:

- Would the potential release of the sub-area, and/or cluster of sub-areas, impact on the role or function of the wider Green Belt in terms of the NPPF purposes? If so, to what extent?
- Would the potential release of a sub-area and/or cluster of sub-areas harm the long-term integrity or permanence of the surrounding Green Belt? For example, would it create ‘islands’ or ‘holes’ in the Green Belt?
- If a sub-area was released, would any further land potentially require release, for example, to avoid leaving behind slivers or islands of Green Belt, or Green Belt boundaries not meeting the NPPF paragraph 149 (f) test?

Overall Wider Impact Performance

For each sub-area (whether part of a cluster or not), an overall conclusion was then reached on its level of contribution to the wider strategic Green Belt – important, partly important or less

⁵² ‘The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024’. King’s Printer of Acts of Parliament. Accessed 20 May 2025. <https://www.legislation.gov.uk/uksi/2024/48/schedule/made>

important. This was judged qualitatively, based on a composite balancing of the factors described above.

4.4.4 Step 3: Categorisation and Recommendations

Step 3 brought together the assessment of the sub-areas against the NPPF purposes (step 2a) and assessment of the impacts on the wider strategic Green Belt (step 2c), categorising each sub-area and/or cluster of sub-areas as to whether or not it should be considered further, as shown in Table 15.

The process of categorisation recognises the potential for sub-areas and/or clusters of sub-areas to meet one or more of the Green Belt purposes strongly but where it is unlikely that there would be harm to the function or integrity of the surrounding Green Belt if the sub-area or cluster were removed from the Green Belt. Conversely, it also reflects the possibility for sub-areas or clusters which meet the purpose assessment criteria weakly to be nevertheless important in terms of protecting the integrity of the surrounding Green Belt.

It is at this point that the benefits of assessing sub-areas as clusters where it is possible to do so becomes clear, because doing so allows for a wider range of possible recommendations. Specifically, sub-areas may at this point be either:

- recommended for retention in isolation– if removed from the Green Belt, harm to the wider Green Belt is likely to result;
- recommended for release in isolation – if removed from the Green Belt, harm to the wider Green Belt is unlikely to result;
- recommended for partial release in isolation – if part of the sub-area is removed from the Green Belt, harm to the wider Green Belt is unlikely to result;
- recommended for retention in combination– if removed from the Green Belt as a cluster, harm to the wider Green Belt is likely to result;
- recommended for release in combination – if removed from the Green Belt as a cluster, harm to the wider Green Belt is unlikely to result but one of the constituent sub-areas could not be removed in isolation without resulting in harm.

Table 15 Sub-area Categorisation/Recommendations

Meets purpose assessment criteria	Contribution to wider strategic green belt	Recommendation (may apply to cluster of sub-areas as well as to individual sub-areas)
Strongly	Important	Not recommended for further consideration
	Less important	Recommended for further consideration
	Part of sub-area less important	Partially recommended for future consideration
Moderately	Important	Not recommended for further consideration
	Less important	Recommended for further consideration
	Part of sub-area less important	Partially recommended for future consideration
Weakly	Important	Not recommended for further consideration
	Less important	Recommended for further consideration
	Part of sub-area less important	Partially recommended for future consideration

4.4.5 Step 4: Consideration of Boundaries

Within the sub-area pro forma it was recorded whether the existing inner and outer Green Belt boundaries met the NPPF paragraph 149 (f) requirement for being readily recognisable and likely to be permanent (with reference to the examples of specific boundary features in Table 13 above). This part of the pro forma also considered where it might be necessary to strengthen currently weak boundaries or to provide new boundaries if the sub-area were to be released.

This requirement is noted for information only at assessment stage. The final decision on whether to strengthen existing boundaries or create new boundaries, including how this might be achieved, will be for the Council to determine based on any new Green Belt boundaries proposed.

Table 16 Boundary Features Classification

Boundary Classification	Features
• Meets NPPF definition • (i.e. readily recognisable and likely to be permanent)	• Motorways • A and B roads • Railway lines • Canals • Rivers and waterbodies • Natural 'buffer' features such as ridgelines
• Does not meet NPPF definition • (i.e. readily recognisable but not necessarily permanent)	• Unclassified public and private roads • Smaller water features, including streams and other watercourses • Prominent physical/topographical features, e.g. embankments • Existing development with strongly established, regular or consistent boundaries • Well-established woodland edges, tree belts and hedgerows

A.1 Review of planning appeals

It is useful and necessary to examine case law as it provides guidance on the interpretation of key terms/concepts within the NPPF, hence increasing the robustness of the study as a whole. It is important to consider the impact of these judgements on Green Belt Assessment methodologies and approaches since Inspectors may consider this at Independent Examination as was the case in North Hertfordshire, where the council was asked to review Green Belt outcomes with respect to recent judgements.

A.1.1 Spatial and visual openness

Paragraph 142 of the NPPF states that one of the fundamental characteristics of the Green Belt is its openness. The PPG states that openness consists of both visual and spatial aspects, and that the degree of activity on a site can also impact overall openness. There have been various appeals that have highlighted the important considerations surrounding the interpretation of ‘openness of the Green Belt’ and are therefore relevant to the assessment of the land against Green Belt purposes.

The Turner judgement (2016)⁵³ highlighted important considerations on openness. It states that the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Greenness is also a visual quality, and the preservation of the visual openness should also be considered.

‘There is an important visual dimension to checking “the unrestricted sprawl of large built-up areas” and the merging of neighbouring towns, as indeed the name “Green Belt” itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and “safeguarding the countryside from encroachment” includes preservation of that quality of openness. The preservation of “the setting ... of historic towns” obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields.’

Appeal cases in Three Rivers⁵⁴ and Cheshire West and Chester⁵⁵ further highlight the need to carefully consider ‘openness’. In the former case, the Inspector concluded the proposal for three dwellings should be allowed as it constituted limited infill development in a village and formed appropriate Green Belt development, therefore the impact of the proposal on openness did not need to be assessed. However, that being said, the Inspector concluded that, regardless, any possible impact on openness would be offset by the removal of an existing structure with a similar footprint to the proposed development.

‘I therefore conclude that the proposal would constitute limited infill within a village and would therefore not be inappropriate development within the Green Belt. Accordingly, there is no need to examine if very special circumstances exist to outweigh any harm arising from inappropriateness. ...

In view of my finding that the proposal is not inappropriate development, the impact on openness does not fall to be formally considered, but the impact of proposal on the openness

⁵³ Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin)

⁵⁴ Planning Inspectorate (2018) Appeal Ref: APP / P1940/W/17/3183388 – Clovercourt Ltd v Three Rivers District Council

⁵⁵ The Planning Inspectorate (2018) Appeal Ref: APP/ A0665/ W/ 17/ 3190601 – Clegg v Cheshire

of the Green Belt would be offset to a large degree by the removal of the barn that has a similar footprint to the proposed houses.'

A case in Cheshire West and Chester concerned plans for a new home to be developed on previously developed land designated as Green Belt. The site concerned was a builder's yard on the edge of a washed over village. The Inspector concluded that it could not be considered infill development, given that it was widely spaced from neighbouring houses and had frontages onto different roads. Further the development would urbanise the site and its surroundings, thereby diminishing the openness of Green Belt. The appeal was accordingly dismissed as follows.

'Indeed, in line with the 2016 Turner v Secretary of State and East Dorset Council judgement the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Such an approach would be far too simplistic and ignore the wider aspects of openness which goes beyond the physical effect of buildings or structures. Factors relevant include how built-up the Green Belt is now and how built-up would it be after development has taken place. Consequently, although it may be accepted that the proposal to redevelop a brownfield site may result in a reduced volume and footprint compared to the buildings and structures currently in place, there are wider factors that must be taken into account in defining the effect of the proposal on openness.'

In assessing the matter of openness there are a number of ways of determining whether there would be encroachment into the Green Belt. The effect of development as encroachment on the countryside may be in the form of loss of openness or intrusion. The Framework identifies that openness is an essential characteristic of the Green Belt.'

The Secretary of State⁵⁶ approved plans to build a replacement secondary school and new homes on land designated as Green Belt east of Guildford, after ruling that 'very special circumstances' had been demonstrated. He agreed with the Inspector that the scheme represented a significant development in the Green Belt which would, inevitably and significantly reduce its openness and would erode the open context of the village. Noting the substantial harm to the Green Belt, however, he ruled that the provision of new housing and a new school carried greater weight.

The Inspector's note⁵⁷ for this appeal highlighted some key considerations in relation to Green Belt, which are relevant to this assessment:

- The two essential attributes of the Green Belt are its permanence and openness, in line with NPPF (paragraph 142);
- The key element to assess is the effect that a development has on the openness of the Green Belt;
- The 'concept of 'openness' is generally considered to be land being free from built development.'; and
- Although openness should be assessed on an individual site/area basis, the cumulative impact on the Green Belt of development on adjacent sites/areas should be considered.

⁵⁶ Ministry of Housing, Communities and Local Government, Secretary of State (2018) Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust

⁵⁷ The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

The Supreme Court in *R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council* [2020] UKSC 3⁵⁸ has provided important clarity as to the interpretation of the openness of the Green Belt and the relationship between ‘openness’ and ‘visual impact’ within the planning judgement of the decision maker. The judgment highlighted the important distinction in planning decisions between planning judgement and legal interpretation of planning policy. While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, will not be a strict nor mandatory determinative factor.

On the interpretation of ‘openness’ and the issue of ‘visual impact’ it was noted that:

‘The concept of “openness” in para 90 of the NPPF [now para 142] seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: “to prevent urban sprawl by keeping land permanently open ...”. Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development.’

Importantly, the Supreme Court reinforced the importance of planning judgement within the role of the decision maker by stating:

‘[Openness] is a matter not of legal principle but of planning judgement for the planning authority or the inspector.’

In appeal decision APP/M3645/W/24/3354630 (14th March 2025)⁵⁹ the appellant’s site was in use as a storage yard for construction materials, equipment and machinery and the inspector adjudged that the intensity of activity and use meant that the site’s existing state made a limited contribution to Green Belt openness. In addition, the inspector noted that hedgerows around the site formed a defensible boundary which screened views of the storage yard, resulting in negligible impacts on visual openness.

In contrast, appeal APP/C4615/W/24/3345744 (2nd April 2025)⁶⁰ was dismissed by the inspector as it was adjudged that existing mature planting around the site perimeter was insufficient to screen the proposed development from adjacent rights of way, and that the proposed battery storage system would therefore be visually intrusive in its rural location.

A further lesson from the judgement of Baroness Taylor in appeal APP/P1940/W/24/3346061 (12th May 2025),⁶¹ within Three Rivers District, is the confirmation that substantial weight does not have to be given to any harm to the Green Belt deriving from harm to its openness where a proposed development is not inappropriate in the Green Belt (in this case a large data centre deemed to be on grey belt). The ruling also confirms that country parks (one element of the development proposal) preserve openness providing there is not significant built development on them.

⁵⁸ <https://www.supremecourt.uk/cases/uksc-2018-0077.html>

⁵⁹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354630&CoID=0>

⁶⁰ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3345744&CoID=0>

⁶¹ https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf

A.1.2 Definition of sustainable locations

Paragraph 155 of the NPPF sets out four criteria that, if all met, would make any development appropriate in the Green Belt. Criterion (c) of paragraph 155 is that the development would be in a sustainable location, with reference to paragraphs 110 and 115. These paragraphs have a focus on access to sustainable transport and active travel modes; paragraph 110 states that “development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes”. Paragraph 115 requires that in assessing development sites it should be ensured that sustainable transport modes are prioritised, and that safe and suitable access to the site is available for all users.

In C Hall’s judgement in appeal APP/T2215/W/24/3354290 (26th February 2025)⁶², the inspector determined that one of the core principles of the Framework is to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling”, and that the nine dwellings proposed on the appellant’s site at Newington Farm would be highly reliant on private cars due to limited access to local services and facilities by other transport modes. The inspector therefore dismissed the appeal, judging that the site was not in a sustainable location and did not satisfy the criteria in paragraph 155(c).

This point of view was also advanced by A Knight in their judgement in appeal APP/B1930/W/24/3342701 (3rd February 2025)⁶³. In this case the site was determined to be in a sustainable location, satisfying paragraph 155 criterion (c), due to suitable access to public transport as the site had good pedestrian connections to local bus networks.

The judgement of A Wright in appeal APP/B1930/W/24/3349988 (19th March 2025)⁶⁴ builds on this principle. The appellant’s site was within 650m of the nearest bus stop, and the inspector determined that local facilities and services could be accessed within acceptable, comfortable or realistic walking distances as outlined in the Manual for Streets and other guidance. However, the inspector judged that the rural, unlit nature of the route and distances to bus stops and services did not satisfactorily meet the criteria of being accessible to all, or at all times (as outlined in NPPF paragraph 115), therefore making the site not sustainable under paragraph 155 criterion (c).

The judgement of Baroness Taylor in appeal APP/P1940/W/24/3346061 (12th May 2025),⁶⁵ within Three Rivers District, builds on this principle. Baroness Taylor took in to account the definition of the nearby settlement, Abbots Langley, in the Core Strategy Spatial Strategy, as one of six key centres in the District. The fact that the Spatial Strategy describes these centres as the most sustainable locations in the District constituted a reason to describe the site as sustainable. Additionally, Baroness Taylor noted that the Council had already considered and stated the site as appropriate for housing and that were housing to be delivered here it would be seen as sustainably located on the edge of a growth settlement, further influencing the judgement that the proposed development was in a sustainable location.

⁶² <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0>

⁶³ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3342701&CoID=0>

⁶⁴ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3349988&CoID=0>

⁶⁵ https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf

A.1.3 Grey Belt in unsustainable locations

In the Newington Farm decision APP/T2215/W/24/3354290 (26th Feb 2025)⁶⁶ noted above, the appeal was dismissed due to the site being in an unsustainable location. This decision was made despite the site being identified as grey belt land. The inspector adjudged that the site did not contribute to purpose (a), (b) or (d), and additionally that as it was contained within the boundary of an existing farm which included existing buildings and hardstanding, it made a limited contribution to openness. As such it did not fundamentally undermine the performance of the wider Green Belt. Being in an unsustainable location due to distance from local services and public transport options however made development inappropriate.

Similarly, Inspector D Lewis judged in appeal decision APP/Z0116/W/24/3342877 (26th Mar 2025)⁶⁷ that a site proposed for development was not in a sustainable location and moreover its location could not be made sustainable. Although the site was agreed by all parties to be grey belt land, not performing strongly against any of the purposes (a), (b), or (d), the unsustainability of the location was determined to render the proposal inappropriate development within the Green Belt, and the appeal was dismissed.

A.1.4 Definition of towns and sprawl

NPPF paragraphs 143(b) and (d) state that the purposes of the Green Belt are to prevent neighbouring towns merging into one another, and to preserve the setting of historic towns. There is no definition given in the NPPF as to what constitutes a ‘town’, but some recent appeal decisions provide some guidance.

In appeal APP/D3640/W/24/3347530 (12th March 2025)⁶⁸, an inspector ruled that the settlements of Bagshot and Windlesham did not constitute towns, being instead “villages of varying scales”, and that the appellant’s site which fell in between the two settlements therefore did not play a role with respect to paragraph 143(b). Both Bagshot and Windlesham had been defined as towns in the LPA’s GBA, but the inspector ruled that this carried less weight than the council’s Core Strategy, in which the settlement hierarchy defined Bagshot as a large village and Windlesham as a smaller village. The inspector also opined that even if both settlements were considered towns, that the parcel of land in their view would not materially erode the gap between them if released for development. Given that the site did not play a role with regards to paragraph 143(b), the inspector determined that it constituted grey belt land.

The judgement in appeal APP/H2265/W/24/3347410 (13th February 2025)⁶⁹ also provides guidance on the interpretation of Green Belt purposes with regard to preventing urban sprawl and the merging of neighbouring towns. The appellant’s site was argued by the council to play a role in preventing urban sprawl as the proposals would contribute to ribbon development along the A20, however the inspector judged that paragraph 143(a) refers only to the unrestricted sprawl of large built-up areas. The nearest settlement (Wrotham) was judged to be a village and therefore not of relevance to this purpose, so the inspector determined that although the site would contribute to ribbon development, this did not amount to the unrestricted sprawl of a large built-up area. The same appeal judgement also stated that London is the most relevant large built-up area in this case

⁶⁶ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0>

⁶⁷ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3342877&CoID=0>

⁶⁸ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3347530&CoID=0>

⁶⁹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0>

with respect to paragraph 143(a), and that the site in question therefore did not perform strongly against this purpose.

In appeal APP/G5180/W/24/3354266 (31st March 2025)⁷⁰, the inspector judged that the neighbouring settlements of Chislehurst, Bickley and Petts Wood had the character of local centres rather than distinct towns as they have significantly merged. As such the appellant's site had an essentially suburban setting, and could not be considered to play a role with regards to preventing neighbouring towns from merging. Given this context, the inspector additionally judged that the site could not play a role in preserving the setting or special of historic towns and the site did not fulfil the purposes set out in paragraphs 143(b) or (d).

In appeal APP/M1520/W/24/3351658 (15th April 2025) the Inspector acknowledged that the settlement of Daws Heath in Essex had been classed as a town in the latest GBA and a village in other development plan documents. The Inspector deemed Daws Heath to be a village for the purposes of judging an appeal site close to the settlement on the basis stated that as services and facilities are limited and Daws Heath is not of a large scale, it must be considered a village. The Inspector reiterated that the appeal site could not, therefore, contribute to purposes (a) or (b) given this relates to large built-up areas and towns rather than villages.

A.1.5 Scale, granularity and proportionality of assessment parcels

In determining a series of six appeals – APP/H1515/W/24/3341474-79 (16th Jan 2025)⁷¹ – Inspector T Gilbert-Wooldridge noted that all parties to the appeals agreed that the six parcels of land in question would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area. The reasoning behind this was that the parcels were small in size compared to the ‘considerable extent’ of the Green Belt across the borough (Brentwood). The inspector adjudged that the sites’ scale caused them to make no more than a limited contribution to checking the unrestricted sprawl of large built-up areas.

Additionally, the inspector stated the following: “Looking at parcels is helpful in a strategic sense to inform plan-making and future development growth. However, for decision making, it seems more relevant to look at a site-specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site”. This aligns with the text of the Green Belt PPG, which indicates that, when identifying grey belt land, using a small number of large parcels will generally not be an appropriate approach and assessment areas should be sufficiently granular to enable their varied contributions to the Green Belt purposes to be functionally determined.

In the Wrotham appeal covered above – APP/H2265/W/24/3347410 (13th Feb 2025)⁷² – the inspector noted that the proposal would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was adjudged that the site's area would be small in relation to the totality of the Green Belt within the borough, and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. As in the Brentwood example, the local authority in this instance (Tonbridge & Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel being judged to be proportionally much less significant.

⁷⁰ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354266&CoID=0>

⁷¹ <https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=60702043>

⁷² <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0>

A.1.6 Footnote 7 land

A further lesson to be drawn from the Wrotham appeal – APP/H2265/W/24/3347410 (13th Feb 2025)⁷³ – is that the presence of a footnote 7 designation on a site does not automatically mean a proposal will be refused. The site in question was within the Kent Downs National Landscape, but the inspector adjudged that the proposal would only have a “limited and localised” impact on the protected landscape, therefore not providing the ‘strong reason’ for refusal required by paragraph 006 of the Green Belt PPG.

⁷³ Ibid.

A.2 Review of Green Belt Assessment elsewhere

In the absence of full guidance to carry out GBA, it is helpful to consider experience elsewhere to identify potential good practice. It should be noted that the timescales for undertaking all of the studies reviewed pre-date the (latest) NPPF, and some of the studies had not been subject to Independent Examination. In identifying good practice from the approaches adopted by other authorities, these factors were taken into account to ensure the methodology adopted is sound and reflects the latest requirements of the 2024 NPPF.

A review of Green Belt evidence bases in the following authorities was undertaken to inform this study:

Aylesbury Vale District Council

Central Bedfordshire Council

Dacorum Borough Council

Chiltern District Council and South Bucks District Council

Hertsmere Borough Council

North Hertfordshire District Council

Royal Borough of Windsor and Maidenhead

Runnymede Borough Council

Sevenoaks District Council

Spelthorne Borough Council

Three Rivers Borough Council and Watford Borough Council

Wycombe District Council

Welwyn Hatfield Borough Council

A.3 Glossary of Terms and Acronyms

Term	Definition
AONB	Area of Outstanding Natural Beauty (the former term for National Landscape)
Countryside	Open land with an absence of built development and characterised by rural land uses including agriculture and forestry (which may include development for such purposes).
Duty to Cooperate	A legislative requirement in the Localism Act 2011 which places a duty on Local Planning Authorities and County Councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
Enclosed	Almost entirely contained or surrounded by built development.
Encroachment	A gradual advancement of urbanising influences through physical development or land use change.
Essential Gap	A gap between towns or large built-up areas where development would significantly reduce the perceived or actual distance between them.
GIS	Geographic Information System
GBA	Green Belt Assessment
Grey belt	For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in NPPF paragraph 143. Grey belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.
Independent Examination	The process by which a planning inspector may publicly examine a Development Plan Document (DPD) or a Statement of Community Involvement (SCI), in respect, before issuing a binding report. The findings set out in the report of binding upon the local authority that produced the DPD or SCI.
Inner Boundary	Boundary which lies between the sub-area and any nearby built-up area.
Irregular	‘Irregular’ boundaries are those that are ill-defined or where large built-up areas are bounded by less defensible, ‘softer’ features.
Large Built-Up Area	Built-up areas with a normal resident population of 75,000 or more, in line with the Office of National Statistics (ONS) definition of such areas. ⁷⁴
Less Essential Gap	A gap between towns where development is likely to be possible without any risk of coalescence between them.
NPPF	National Planning Policy Framework
Open Land	Open land refers to land that is not covered by built development.

⁷⁴ Available at <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/townsandcitiescharacteristicsofbuiltupareasenglandandwales/census2021#built-up-areas>

Term	Definition
Openness	Openness refers to the extent to which Green Belt land could be considered open based on an absence of built development.
OS	Ordnance Survey
Outer Boundary	Boundary which lies between the sub-area and the wider Green Belt.
Parcel	A sub-division of the wider local authority Green Belt for the purposes of Stage 1 Assessment- to be distinguished from sub-areas, which are sub-divisions defined for the same purpose, but at Stage 2 Assessment level.
PAS	Planning Advisory Service
PDL	Previously Developed Land
PRoW	Public Right of Way
PPG	Planning Practice Guidance
RAMSAR	Ramsar Sites are wetland of international importance that have been designated under the criteria of the Ramsar Convention on Wetlands. ⁷⁵
Regular	‘Regular’ boundaries are those comprising well defined or rectilinear built-form edges or where built-up areas are bounded by more defensible features
SAC	Special Area of Conservation; an SAC protects one or more special habitats and / or species – terrestrial or marine – listed in the EU Habitats Directive.
Sprawl	The spread of urban development in a sporadic, dispersed or irregular way.
SSSI	Special Site of Scientific Interest; an SSSI is an area of special interest due to its fauna, flora, geological or physiographical features.
Sub-area	A sub-division of the wider local authority Green Belt for the purposes of Stage 2 Assessment- to be distinguished from parcels, which are sub-divisions defined for the same purpose, but at Stage 1 Assessment level.
Town	Refers to settlements within Tonbridge and Malling and in neighbouring authorities above a certain level in the emerging Local Plan settlement hierarchy, defined on an authority-specific basis. As such, normally (but not always) refers to larger settlements, and is necessary to define for Purpose (b), which refers to separation of two or more towns, and is not relevant for separation between villages, or between towns and villages.
Wider Gap	A gap between towns where limited development may be possible without coalescence between them.

⁷⁵ See <https://www.ramsar.org/our-work/wetlands-international-importance/ramsar-list>

A.4 Duty to Co-operate Consultation

TMBC sought feedback on the methodology from adjoining Local Authorities to ensure consensus on the approach. The following authorities were consulted:

- Gravesham Borough Council
- Maidstone Borough Council
- Medway Council
- Sevenoaks District Council
- Tunbridge Wells Borough Council

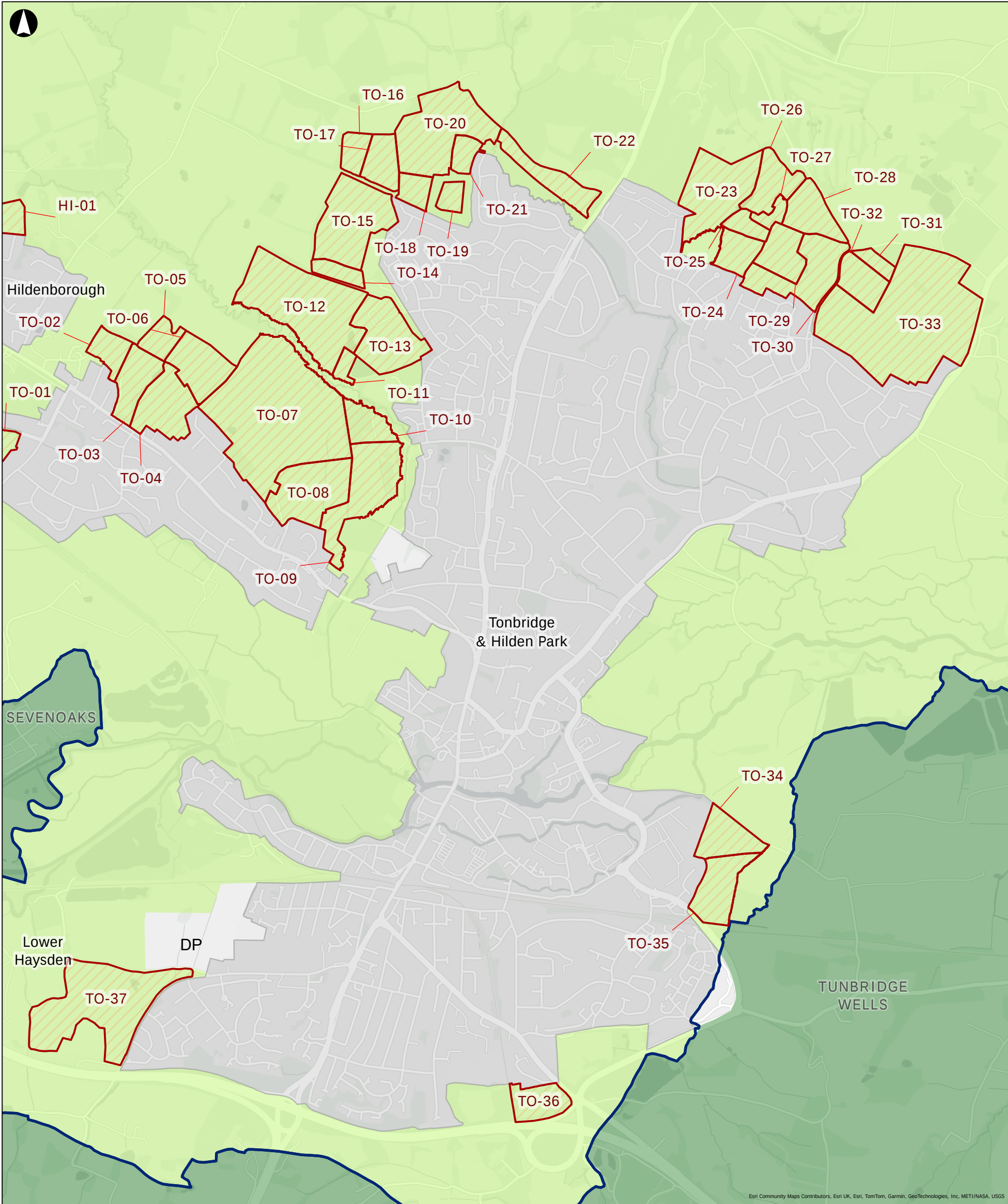
Stakeholders were able to provide written comments on the draft Methodology. The table below presents the consultee responses, details Arup's response and where appropriate, the change(s) made.

Consultee	Consultee comment	Response
Medway Council	Page 25 – how does this relate to how you have designated your centres and villages?	Tier names in new Tonbridge and Malling settlement hierarchy now added.
	Page 26, table 3 – This should include Strood	Agree. Strood now added.
	Page 28, table 4 and in relation to figure 5 – how would you address a scenario of potential infill combined with contiguity, i.e. say for example an infill area were identified in figure 5 within the contiguous area? What score would that get?	The score would be determined on a case-by-case basis depending on the context. In some cases, it may be more appropriate for an area in such a context to be defined as infill and in others as contiguous- depending on the relationship of the sub-area with the edge of the large built-up area. Footnote to this effect added.
	Page 31, table 5 – I think if you are looking further to Chatham, you will need to include Rochester as well in terms of proximity. Rochester is also along the river.	Agree. Rochester now added.
	Page 35, table 7 – how did you arrive at these percentages for the built-up area? Apologies if I have missed that in the narrative.	Yes, already in narrative- see page 34. No change made.
	Page 36, table 8 – we have considered Strood and Rochester in this historic town context particularly with regard to the River Medway, which provides an experiential aspect of the setting for Rochester as a historic town.	Agree. Strood added, Rochester already referenced.
	Page 42, map – not sure what the number and color coding indicates. Would have been useful with a legend.	There is no colour coding. The colours were used in the original Landscape Character assessment simply to differentiate assessment parcels. The numbers refer to the parcel number for the purposes of Stage 1 Green Belt assessment. Text added to this effect to the narrative (page 40).
Sevenoaks District Council	It is noted (at para 4.2.1) that TMBC is also using the ONS classification to define large built-up areas, which is consistent with the SDC approach	Noted and welcomed. No action.
	In relation to towns (Table 5) – identifying Sevenoaks town is noted (our other 3 towns lie some distance from the TMBC boundary)	Noted and welcomed. No action.
	Ditto for Table 8 (historic towns). It is agreed that the list of historic towns should be consistent across both the SDC and TMBC methodologies.	Noted and welcomed. No action.

	It is helpful that both studies now use landscape character as the basis for the Stage 1 parcel boundaries	Noted and welcomed. No action.
	In term of settlements ‘tiers’ (in Table 10), it would be useful to understand which tiers 1-4 relate to (towns, service settlements etc), to ensure this is consistent with the focus on the same level of settlement in the SDC study	Tier names in new Tonbridge and Malling settlement hierarchy now added.
Tunbridge Wells Borough Council	Section 1.2 Supports the overall approach of a thorough two stage assessment process and agree with the statement on the role of a GBA. However, the PPG advises that a GBA should identify grey belt, which is not mentioned in this section even though the methodology includes as assessment of grey belt.	Section 1.2 has been updated to include reference to grey belt assessment.
	Section 4.3.2 Stage 1 – definition of assessment areas Noted that the parcels follow the landscape character assessment boundaries even though the methodology recognises that landscape character does not necessarily align with contribution to GB purposes. Further clarity sought to explain this approach more fully.	The methodology has been updated to make this clearer.
	Section 4.2.3 Purpose (c) Sevenoaks and Tonbridge & Malling GBAs, which are being carried out at the same time, adopt slightly different categorisation for this purpose (e.g. strongly rural vs largely rural). More similar terms and definitions could be used.	National policy and guidance do not contain definitions for these key terms. It is an accepted part of GBAs to define these for each study. There are not necessarily the same across studies (even when carried out by the same consultants) to reflect local contexts. Previous experience suggests the key factor to a robust assessment is to define terms and criteria clearly and ensure criteria are applied consistently within a district. No change.

Section 4.2.4 - Purpose (d) The GBA methodology refers to a previous study to identify historic towns, however, it should instead set out its own rationale for each historic town. For example, pages 15-16 in the TWBC Green Belt Study Stage 2 discuss the historic towns of Royal Tunbridge Wells and Tonbridge with the commentary discussing the historic settlement patterns and the relationship with the surrounding landscapes. It is important that Sevenoaks and Tonbridge & Malling GBAs, which are being carried out at the same time, adopt the same definitions for common historic towns on maps.	Methodology text has been updated to provide further clarity on how historic towns have been selected. However, it was not considered necessary to delve into the level of detail suggested. This would be disproportionate compared to how settlements are identified for purposes (a) and (b).
Section 4.2.5 - Purpose (e) It is important that Sevenoaks and Tonbridge & Malling GBAs, which are being carried out at the same time, adopt the same approach to purpose e.	- Sevenoaks and TMBC have now fully aligned methodology for purpose (e) assessment.
Section 3.3.3 / Section 4.4.3 - Step 2b: Grey belt identification The text omits the second part of bullet point 3 of the PPG, i.e. “consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (<i>other than Greenbelt</i>) would potentially provide a strong reason for refusing or restricting development of the assessment area.” The second part of the bullet is not given full enough consideration in the Step 2b methodology or Table 13 The methodology needs to be clearer with regards to how National Landscape is being treated with regards to the application of the footnote 7 considerations.	Text amended to ensure the PPG is fully reflected and to provide additional clarity.

A.5 Sub-area maps by settlement



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 Sub-areas for Assessment

-  Local Authority Boundaries
-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Settlements

DP Safeguarded Land from the Local Development Plan

Coordinate System: British National Grid

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Drawing Title
Sub-areas for assessment: Tonbridge

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Suitability

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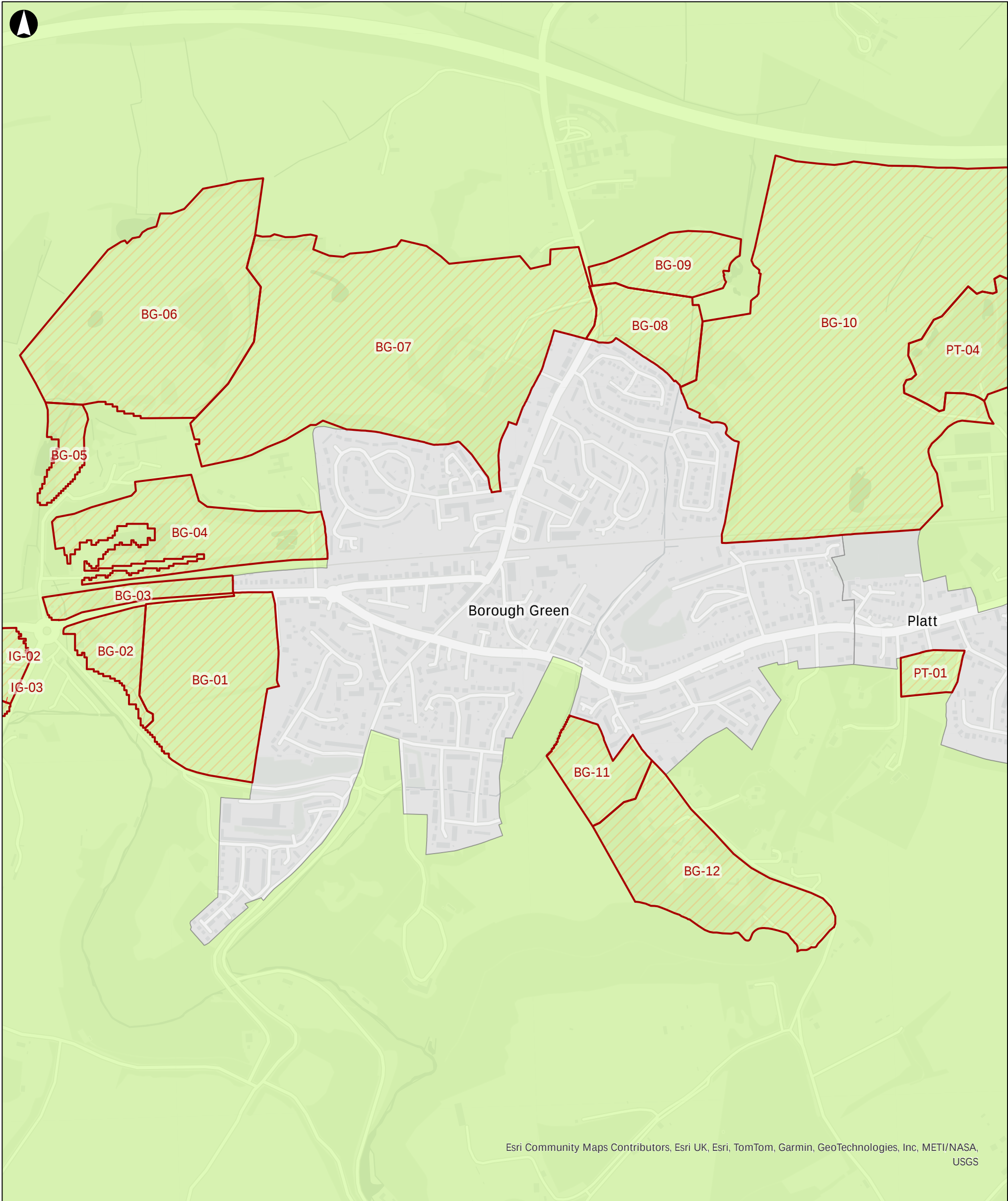
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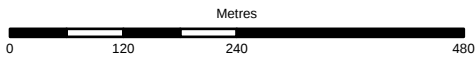
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 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Local Authority Boundaries
-  Settlements



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Figure 14 Borough Green

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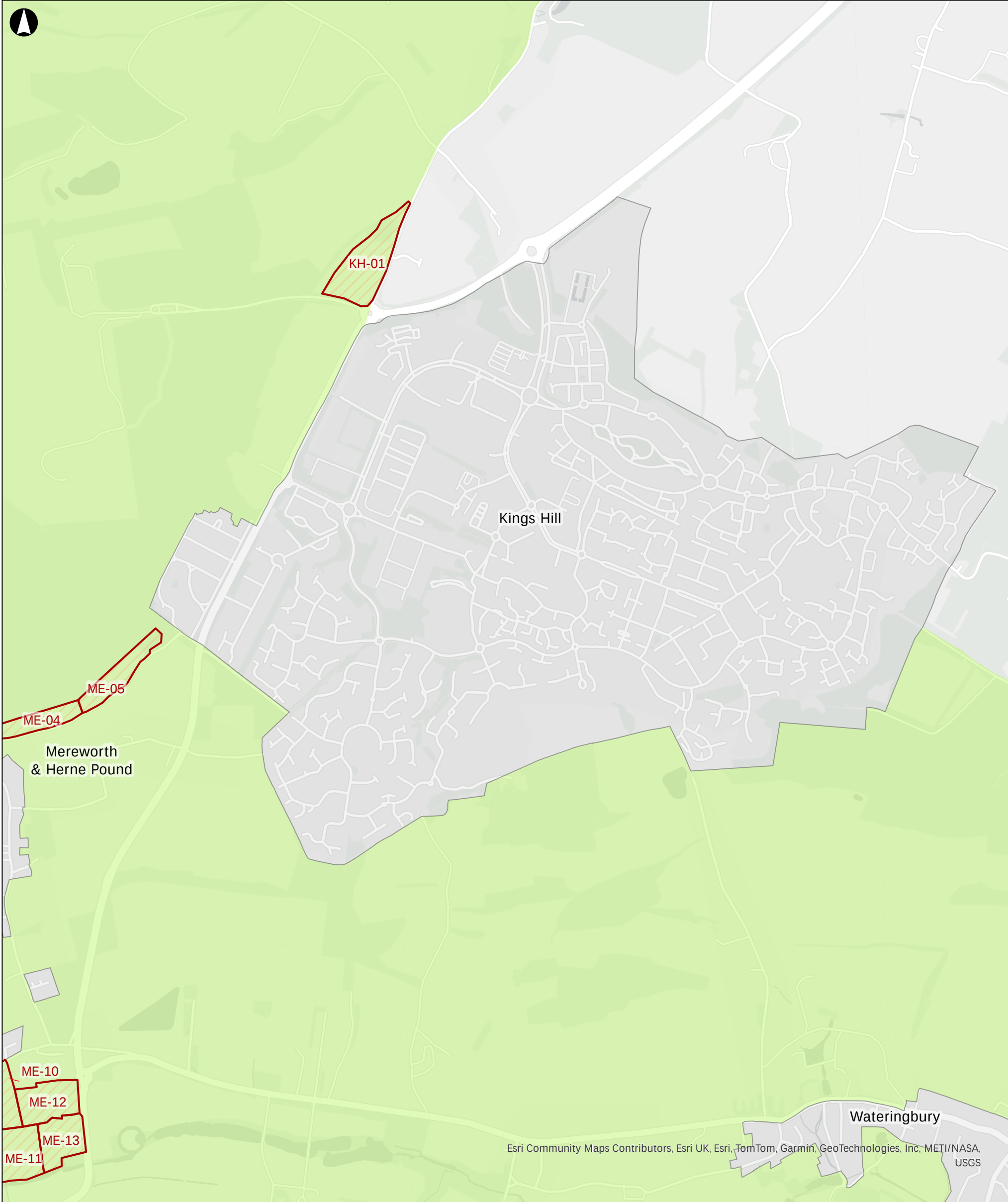
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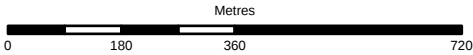
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-  Tonbridge & Malling Green Belt
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Figure 15 Kings Hill

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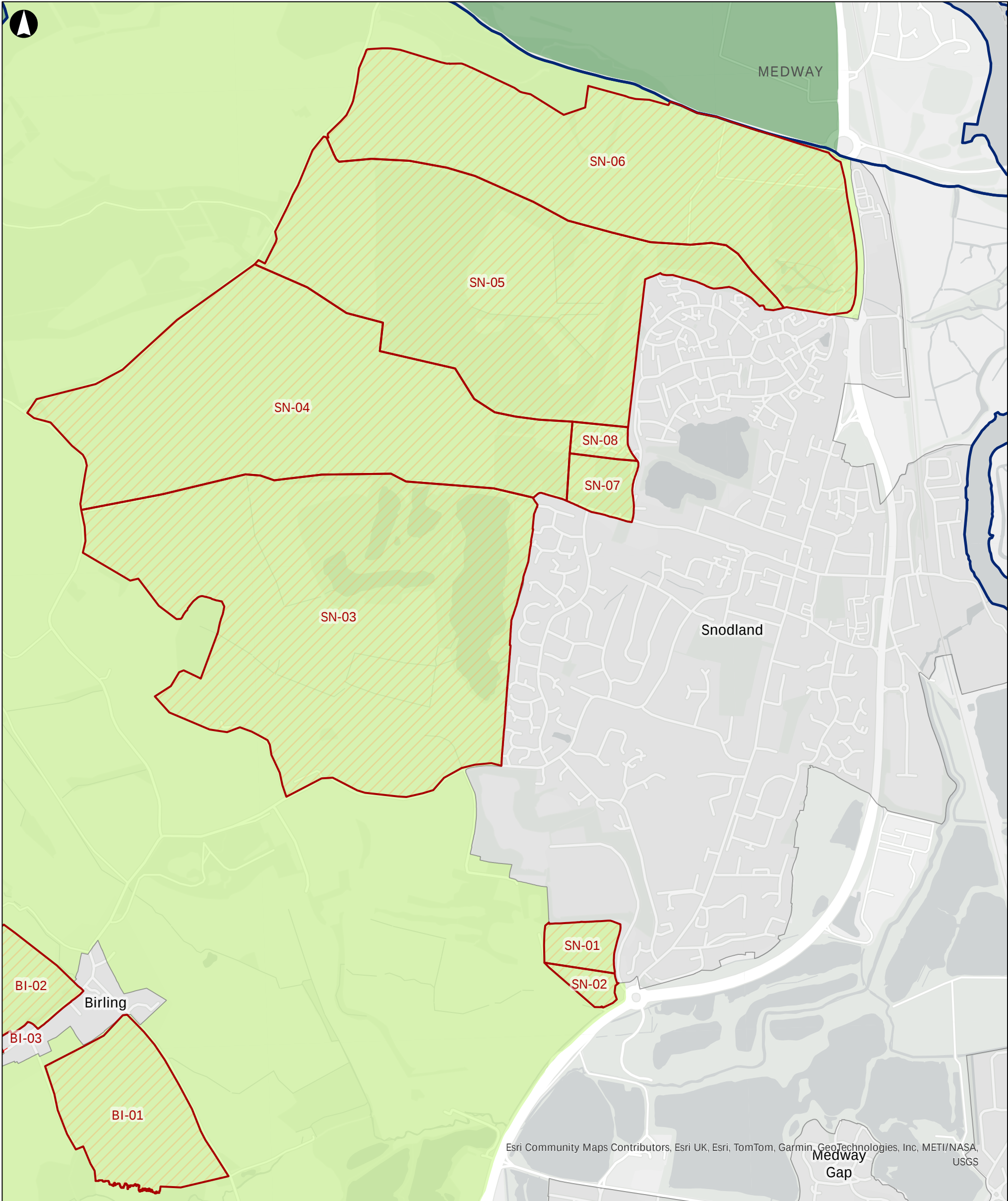
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Sub-areas for Assessment

Tonbridge & Malling Green Belt

Neighbouring Green Belt

Local Authority Boundaries

Settlements

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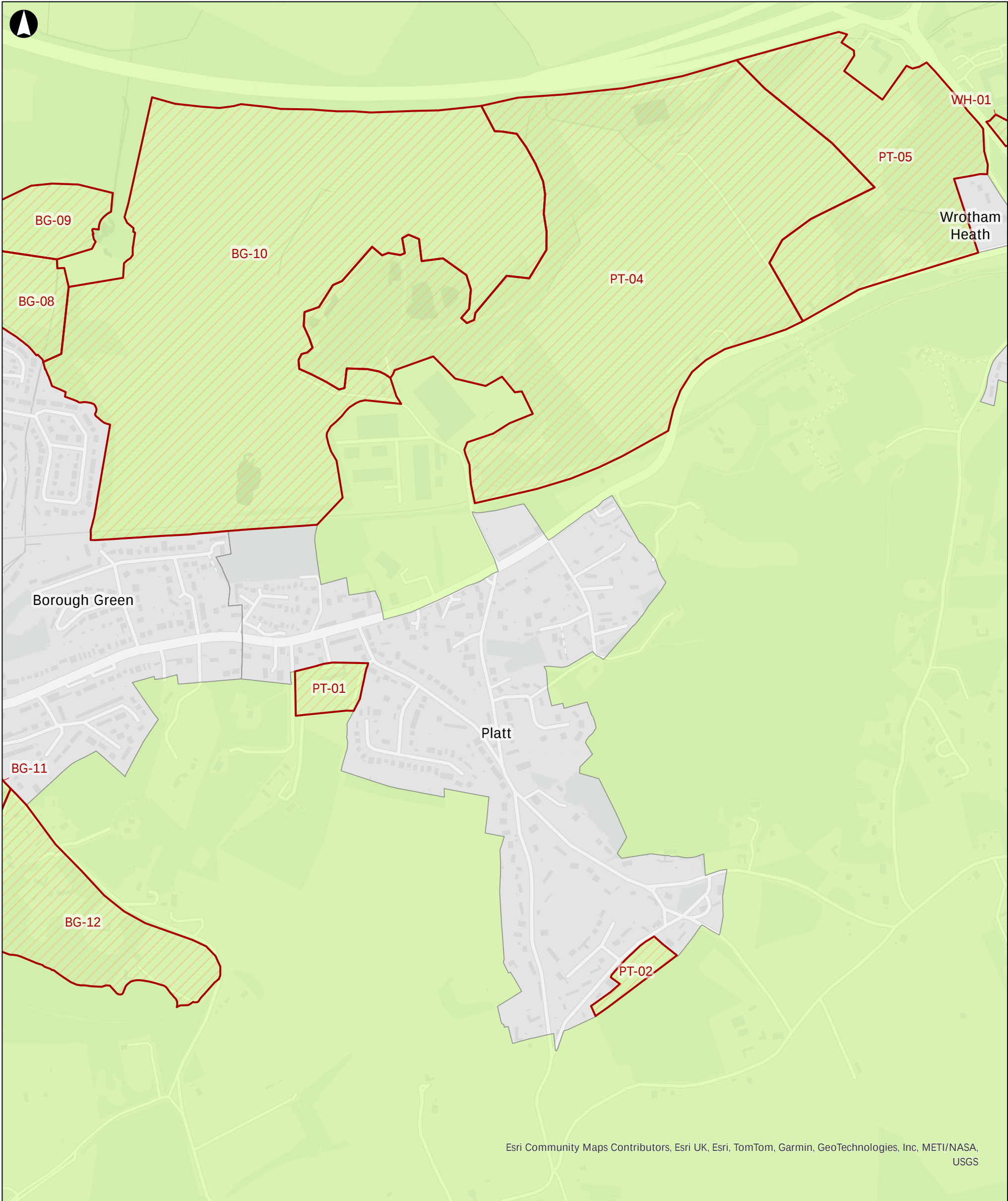
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Tonbridge & Malling Green Belt

Neighbouring Green Belt

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Figure 17 Platt

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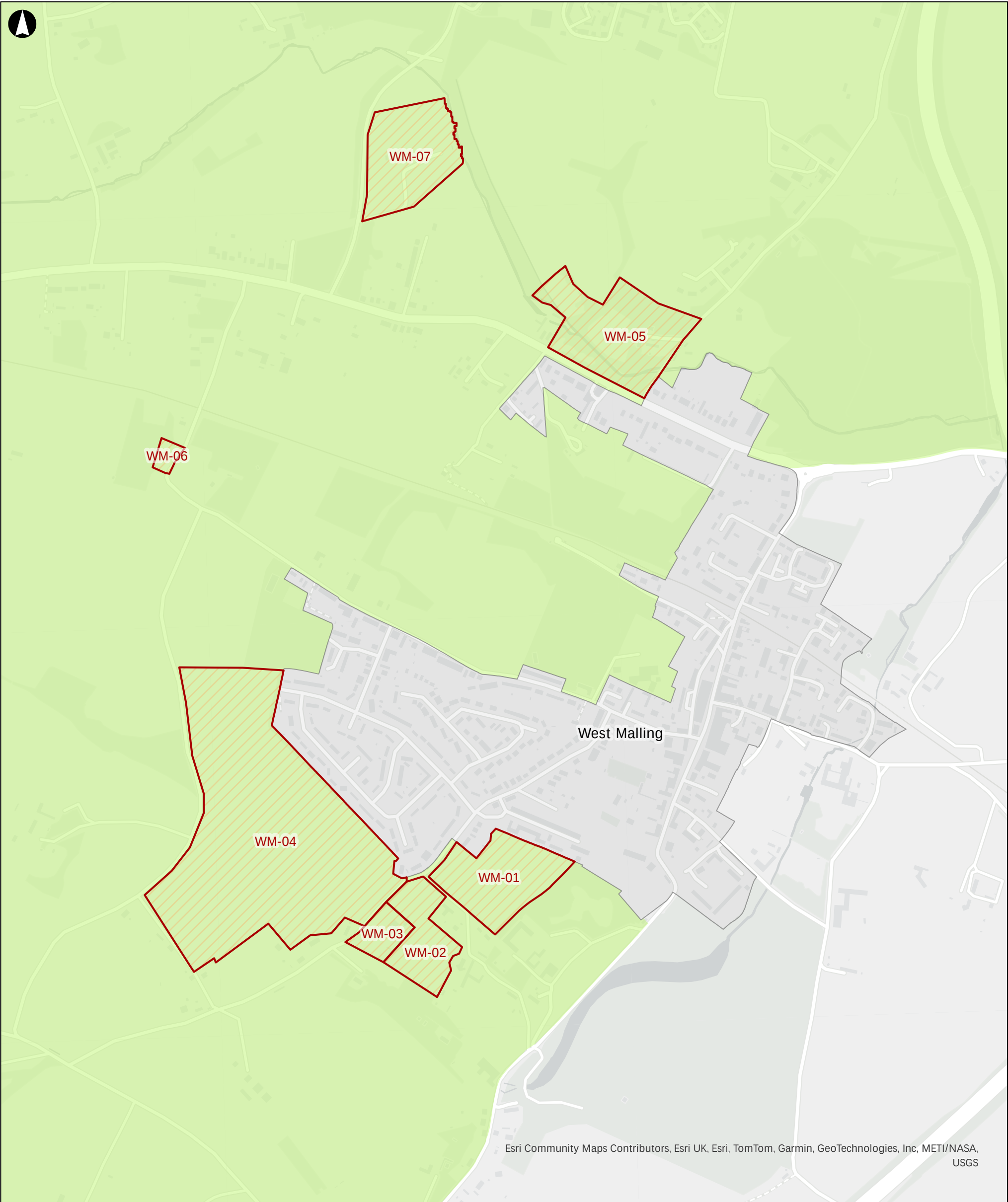
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Figure 18 West Malling

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Role

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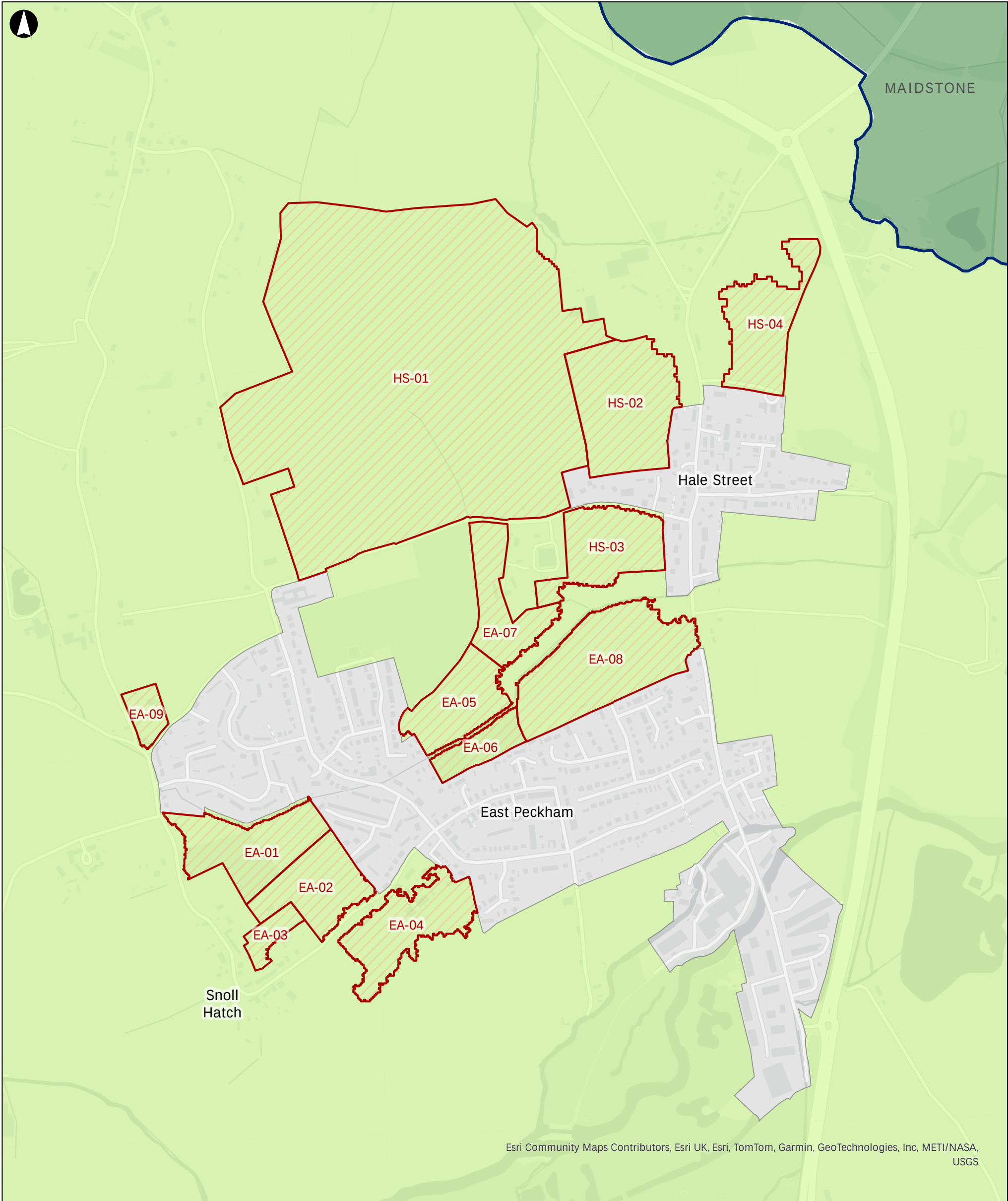
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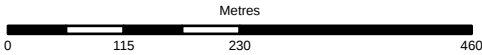
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 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
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-  Local Authority Boundaries
-  Settlements



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Figure 19 East Peckham

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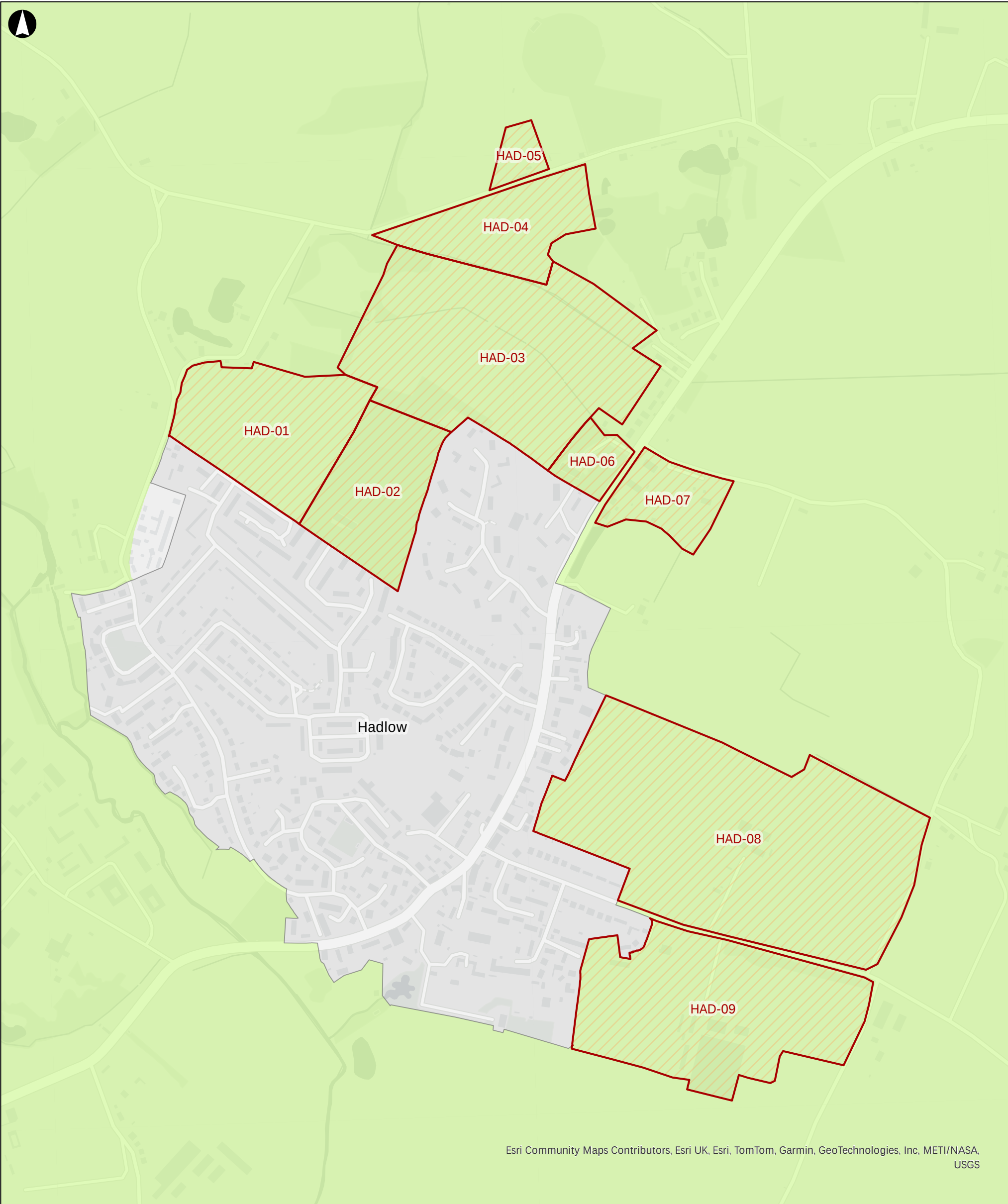
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 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Local Authority Boundaries
-  Settlements

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Figure 20 Hadlow

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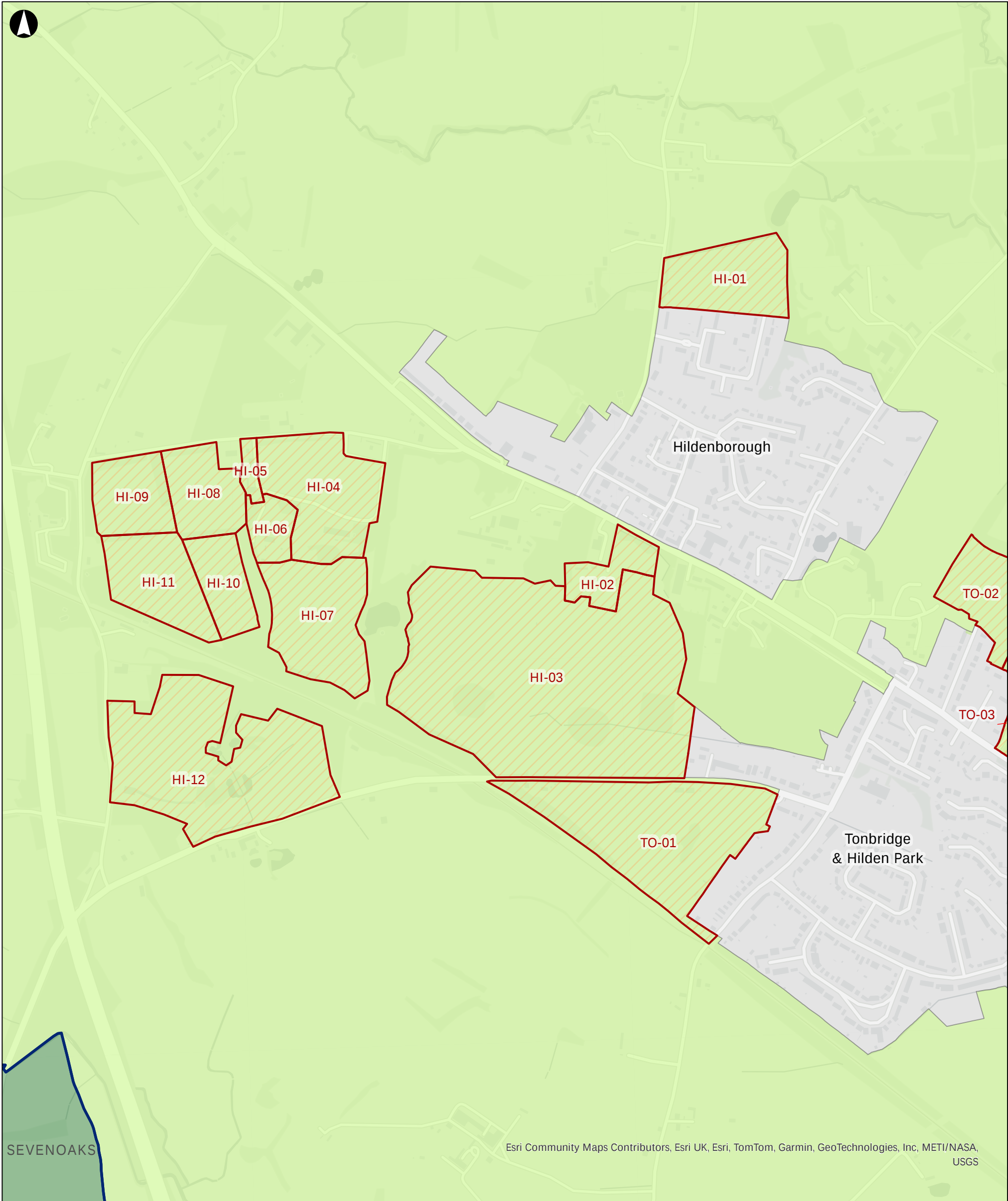
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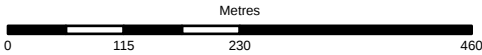
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 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
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-  Settlements



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Figure 21 Hildenborough

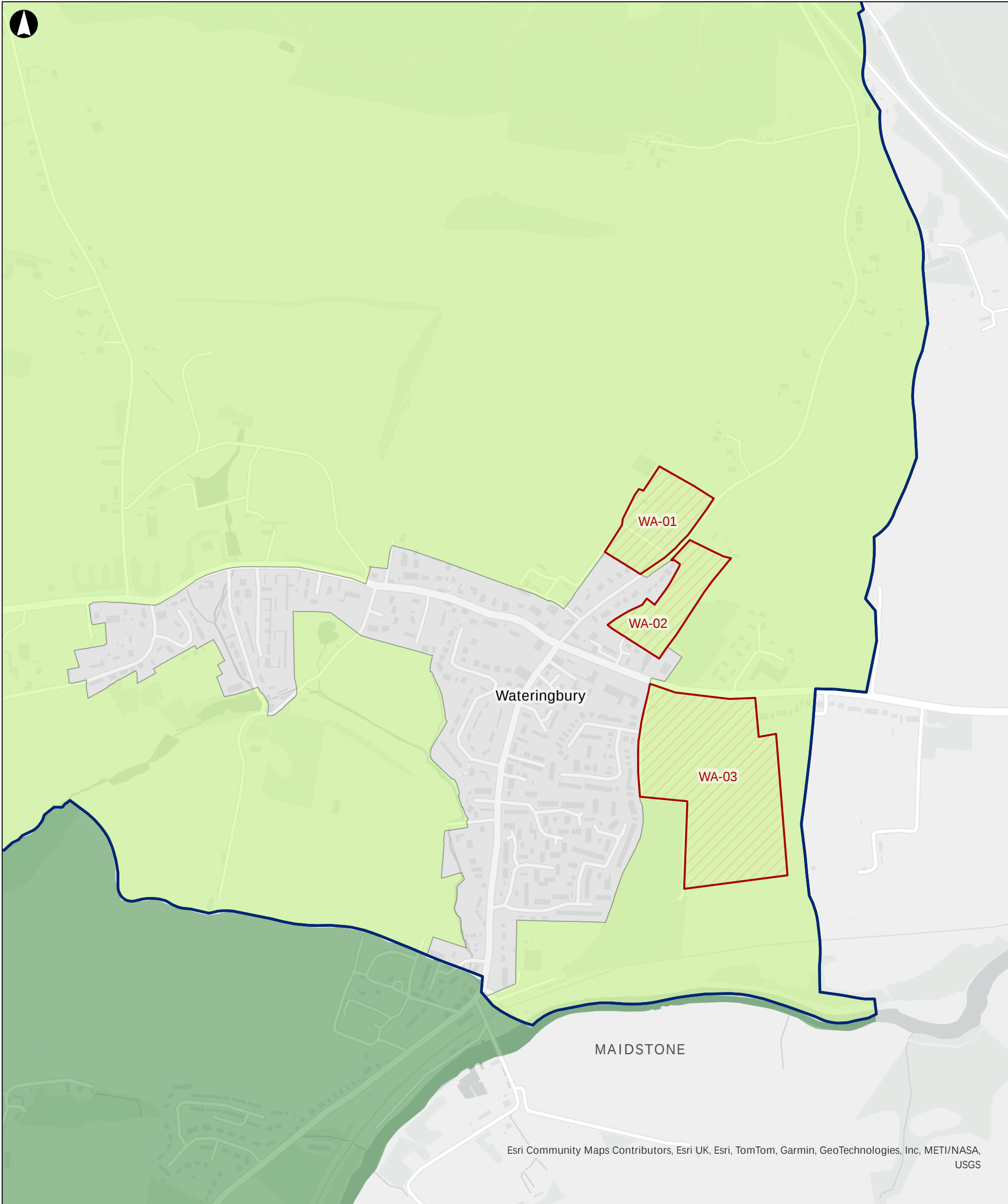
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Sub-areas for Assessment

Tonbridge & Malling Green Belt

Neighbouring Green Belt

Local Authority Boundaries

Settlements

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Figure 22 Waterringbury

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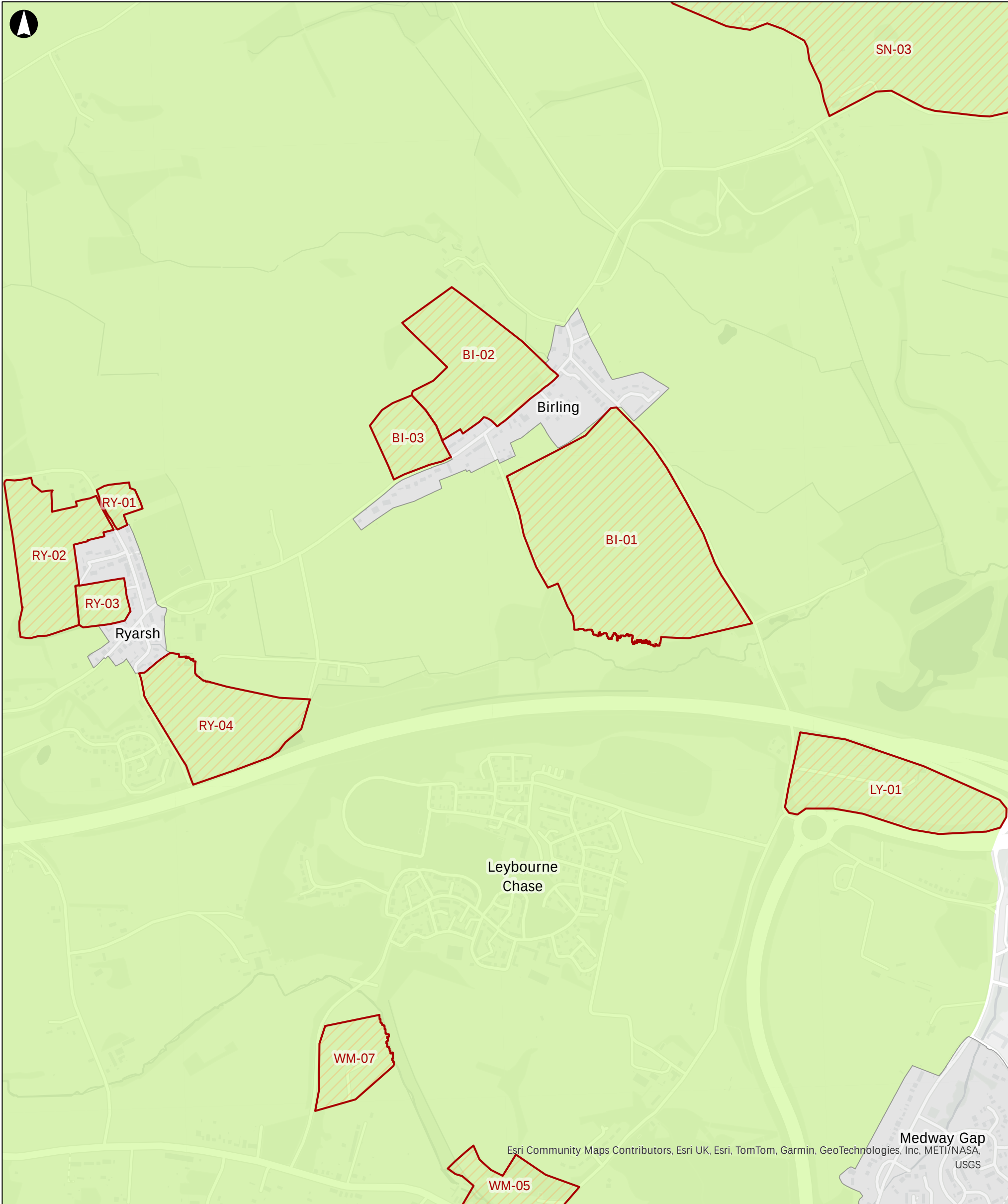
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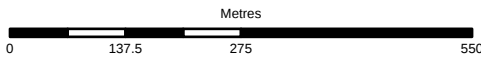
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 Sub-areas for Assessment

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-  Local Authority Boundaries
-  Settlements



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Figure 23 Birling, Leybourne Chase and Ryarsh

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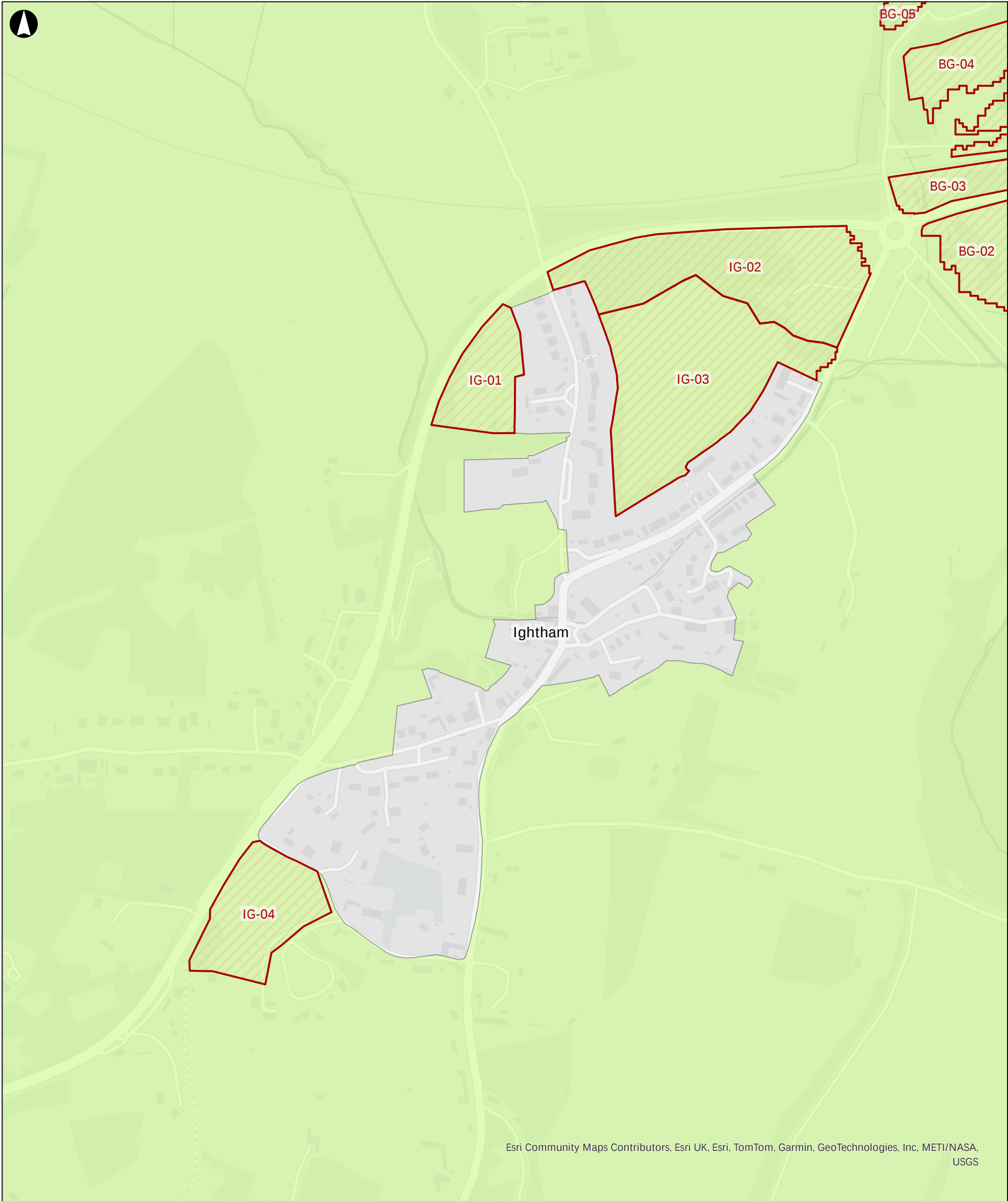
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 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Local Authority Boundaries
-  Settlements

Metres
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Project Name
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Drawing Title
Figure 24 Ightham

Scale at A3
1:5,000

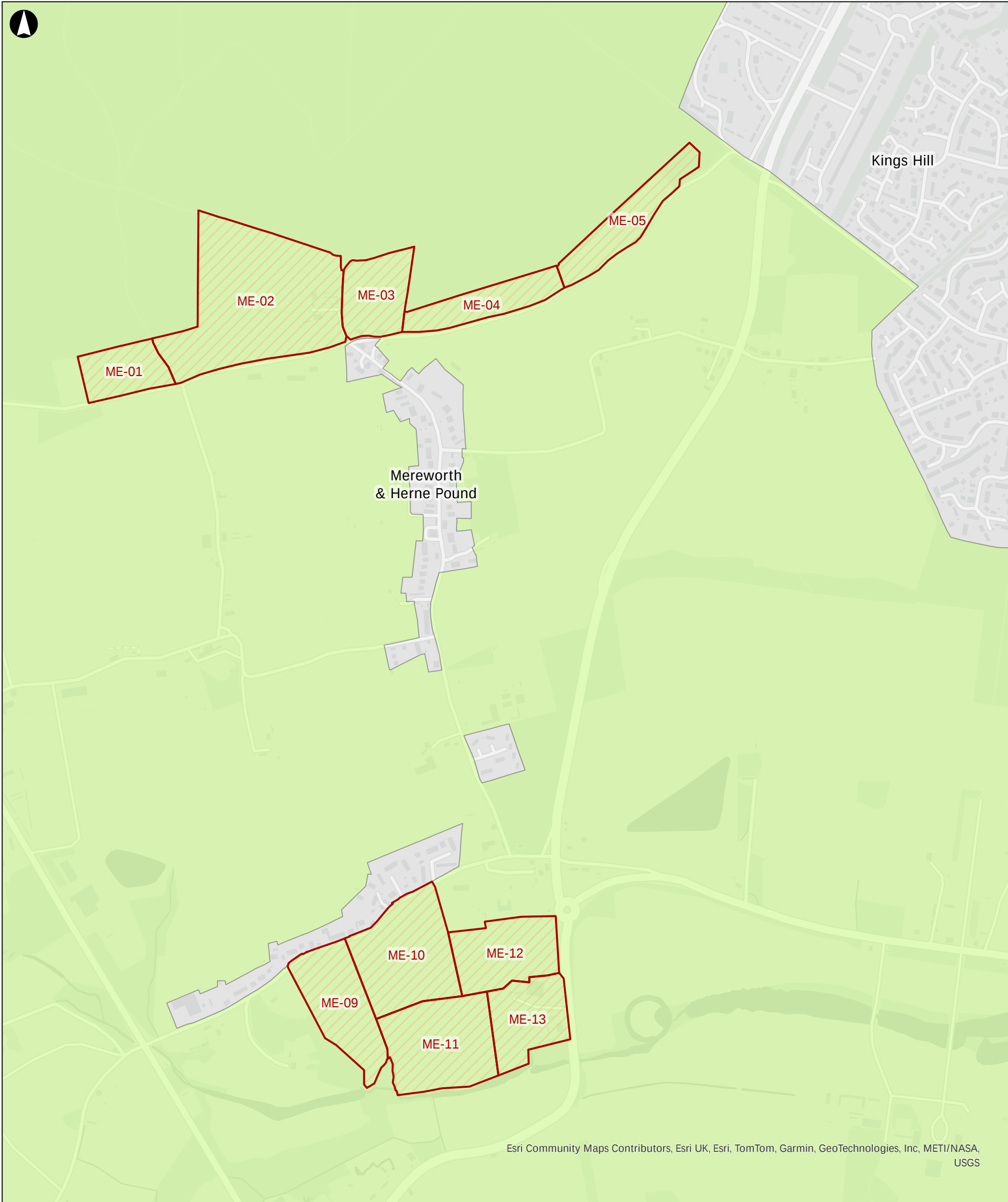
Role
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Suitability
--

Project Number
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Rev
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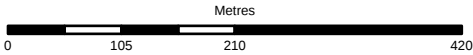
Drawing Name
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 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Local Authority Boundaries
-  Settlements



--	June 25	WJ	JH	KK	--
Rev	Date	By	Chkd	Appd	Authd

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www.arup.com

Client
Tonbridge & Malling Borough Council

Project Name
Tonbridge & Malling Green Belt Assessment

Drawing Title
Figure 25 Mereworth

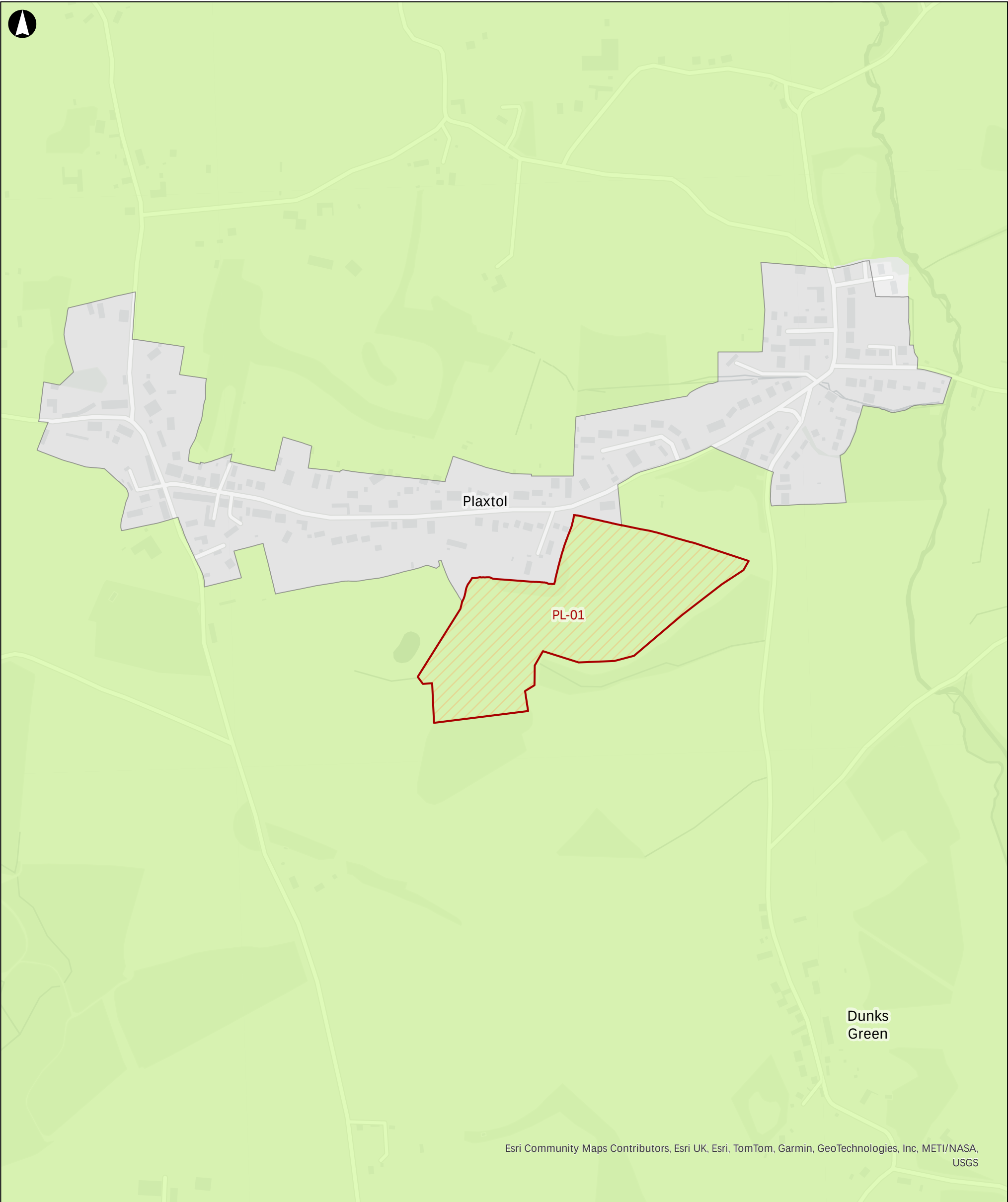
Scale at A3
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Role
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Suitability
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Project Number --	Rev --
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Drawing Name
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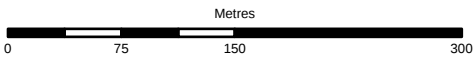


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Esri Community Maps Contributors, Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
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Drawing Title
Figure 26 Plaxtol

Scale at A3
1:5,000

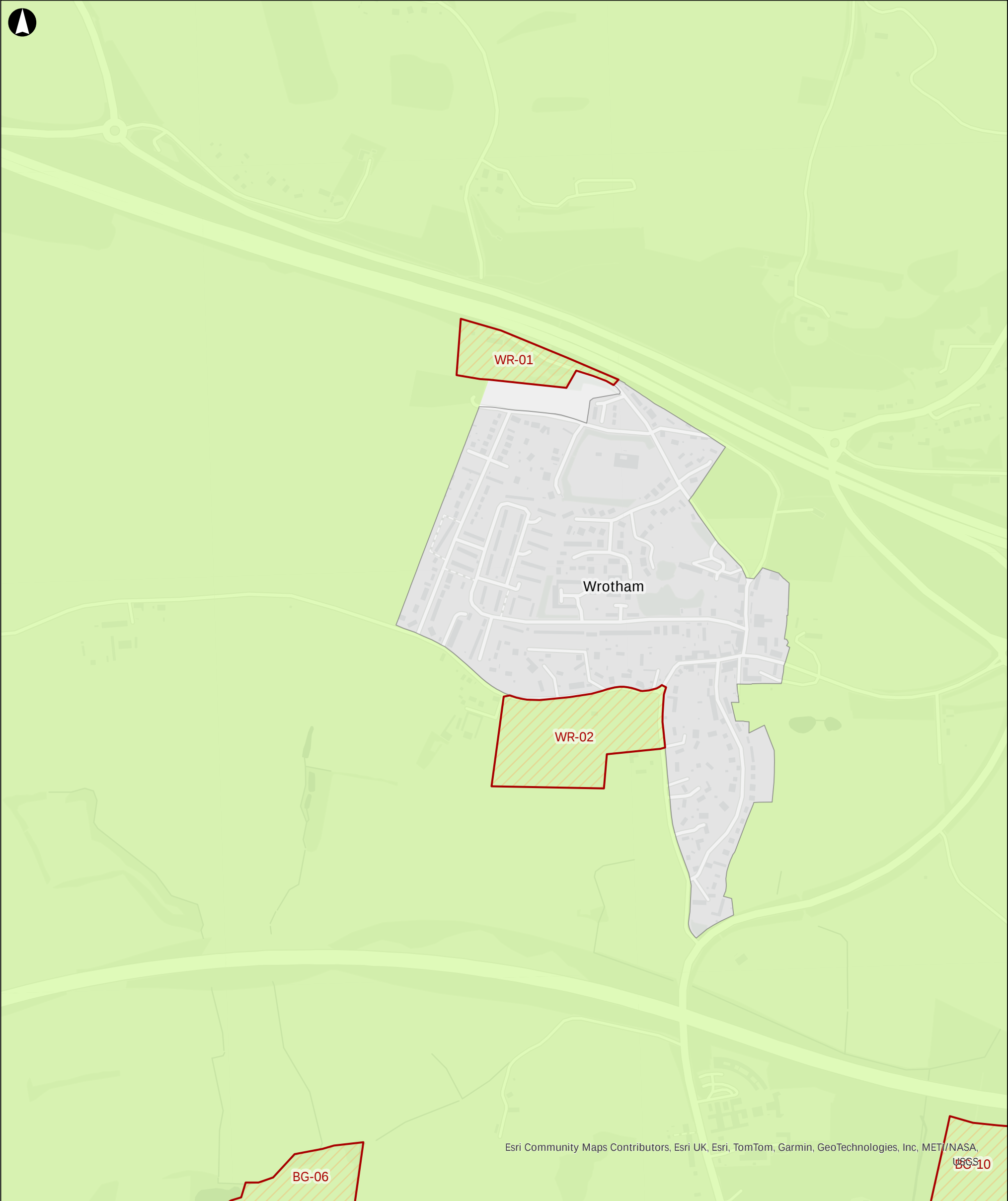
Role
--

Suitability
--

Project Number
--

Rev
--

Drawing Name
--



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 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Local Authority Boundaries
-  Settlements

Metres
0 105 210 420

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Drawing Title
Figure 27 Wrotham

Scale at A3
1:7,000

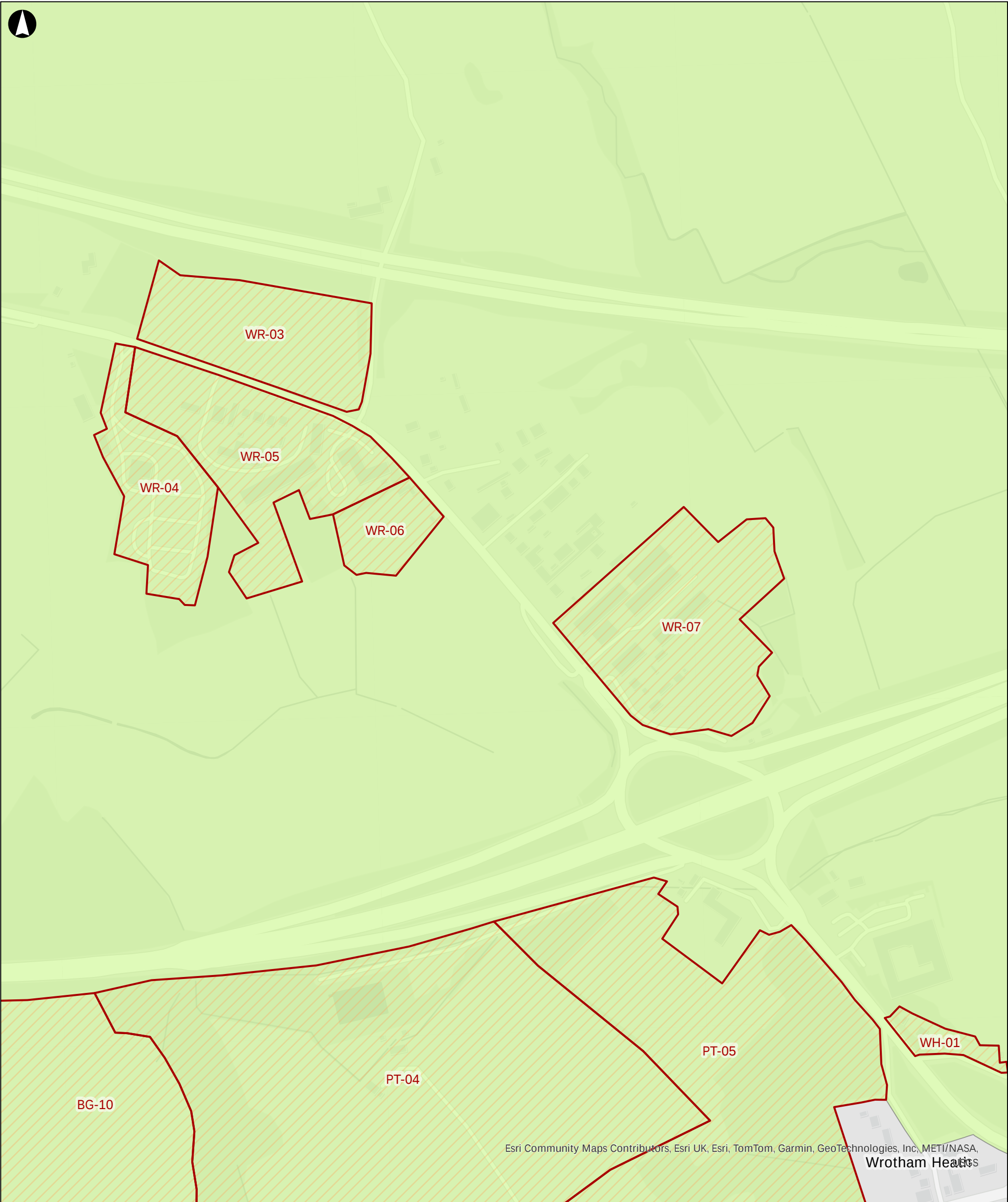
Role
--

Suitability
--

Project Number
--

Rev
--

Drawing Name
--



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 Sub-areas for Assessment

-  Tonbridge & Malling Green Belt
-  Neighbouring Green Belt
-  Local Authority Boundaries
-  Settlements

Metres
0 65 130 260

--	June 25	WJ	JH	KK	--
Rev	Date	By	Chkd	Appd	Authd

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Project Name
Tonbridge & Malling Green Belt Assessment

Drawing Title
Figure 28 M26 Junction 2a

Scale at A3
1:4,480

Role
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Suitability
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Project Number
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Rev
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Drawing Name
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