The sub-area performs weakly against the purposes overall. The sub-area does not meet purposes (a), (b) or (d) and performs weakly against purpose (c).

| Strategic Assessment           |               |               |             |             |             |  |
|--------------------------------|---------------|---------------|-------------|-------------|-------------|--|
| Stage 1<br>Parcel Scores (GBA) | Purpo         | ose (a)       | Purpose (b) | Purpose (c) | Purpose (d) |  |
| for parcel P6                  | Criterion (a) | Criterion (b) |             |             |             |  |
|                                | NO            | 0             | 3           | 3           | 0           |  |

### Assessment of wider impact

At a more granular level, the sub-area performs similarly against purposes (a) and (d) compared to the Stage 1 parcel, and performs more weakly against purposes (b) and (c). The sub-area performs more weakly against purpose (b) as it is much smaller than the Stage 1 parcel, and therefore does not form a significant part of the gap between any two towns. The sub-area performs more weakly against purpose (c) because it is overall more developed than the larger Stage 1 parcel and therefore has a less rural and open character.

The sub-area does not adjoin any other sub-areas. The removal of the sub-area in isolation would not result in an irregular pattern of development. Although the role of the Green Belt to the north and west would be impacted with regards to preventing sprawl as it would now be located on the settlement edge, in practice the M20 forms a strong and prominent barrier to further sprawl to the north, so the wider Green Belt's role in safeguarding the countryside is not likely to be significantly affected. As the sub-area already contains significant development, it is an anomaly in the Green Belt and its removal is therefore not likely to impact the wider Green Belt's sense of openness. Additionally, due to the sub-area's more urban character as well as its strong visual enclosure, its removal is not likely to bring new urbanising influences to the surrounding Green Belt or undermine the wider Green Belt's performance against purpose (c).

Overall, the sub-area plays a less important role with respect to the Stage 1 parcel, and its removal in isolation is unlikely to significantly harm the performance of the wider Green Belt.

### **Boundary Assessment**

Commentary on boundary features and impact on Green Belt boundary strength The inner boundary of the sub-area is not readily recognisable or likely to be permanent. The outer boundary of the sub-area is predominantly readily recognisable but is in part not necessarily likely to be permanent. If the sub-area was released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent and would require strengthening.

### Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs weakly against the NPPF purposes and makes a less important contribution to the wider Green Belt. Recommended for further consideration as RA-040.

### Recommended Area Map

### Legend



Recommended Areas



Recommended in Combination



Settlements



Local Authority Boundaries



Tonbridge & Malling Green Belt



Neighbouring Green Belt





The sub-area is bounded by Kemsing Road to the north, by Borough Green Road to the east, by the regular side of a residential property and garden along Borough Green Road and a mature hedgerow to the south and by a mature tree line to the west. Inner boundary: north and east. Outer boundary: south and west.



Looking east from the north-western corner of the sub-area onto an arable field.



Looking north-west from the south-eastern corner of the sub-area onto an arable field and dispersed trees.



Looking south-west from the northern boundary of the sub-area onto an arable field.



Looking south from the northern boundary onto an arable field and the structure of an agricultural building.

Sub-area Assessment Summary

|                 | Purpose (a)   |               | Purpose (b) | Purpose (c) | Purpose (d) |
|-----------------|---------------|---------------|-------------|-------------|-------------|
| Sub-area scores | Criterion (a) | Criterion (b) | 0           | 5           | 0           |
|                 | NO            | 0             |             |             |             |

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

| (a) Land parcel is     |
|------------------------|
| located at the edge of |
| a large built-up area  |
|                        |

The sub-area is not at the edge of a large built-up area in physical or perceptual terms.

(b) 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 durable boundary

The sub-area does not meet purpose (a).

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

Restricts development that would result in merging of or significant erosion of the gap between neighbouring builtup areas

Due to its distance from any relevant towns, the sub-area makes no discernible contribution to the separation of towns in physical or perceptual terms.

### Purpose (c) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development

The sub-area is not covered by any built form. The sub-area consists of an open field. At the time of the site visit, the frame of a temporary agricultural building was present in the north of the sub-area. The sub-area has a slightly rising topography towards the north-east, allowing for long views towards the wider countryside to the south-west. Due to the lack of mature tree lines along the north and west boundaries, the sub-area is subject to urbanising influences from direct visual connection with development within Wrotham. Overall, the sub-area has a strongly unspoilt rural character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside

The sub-area meets the purposes strongly overall. The sub-area does not meet purposes (a), (b) or (d), but performs strongly against purpose (c).

| Strategic Assessment           |               |               |             |             |             |  |
|--------------------------------|---------------|---------------|-------------|-------------|-------------|--|
| Stage 1<br>Parcel Scores (GBA) | Purpo         | ose (a)       | Purpose (b) | Purpose (c) | Purpose (d) |  |
| for parcel P6                  | Criterion (a) | Criterion (b) |             |             |             |  |
|                                | NO            | 0             | 3           | 3           | 0           |  |

### Assessment of wider impact

At a more granular level, the sub-area performs similarly against purpose (a) and (d) compared to the Stage 1 parcel, performs more weakly against purpose (b), and performs more strongly against purpose (c). The sub-area performs more weakly against purpose (b) as it is much smaller than the Stage 1 parcel, and is largely enclosed by the settlement of Wrotham and adjacent development within the Green Belt, therefore not playing a role in maintaining a gap between any two towns. The sub-area performs more strongly against purpose (c) because it is overall much more open and rural in character than the larger Stage 1 parcel due to not being covered by any development.

The sub-area does not abut any other sub-areas, and adjoins wider Green Belt to the south and west. As the sub-area faces the settlement of Wrotham to the north and east, its removal in isolation would produce an irregular Green Belt boundary with slivers of Green Belt remaining covering Kemsing Road and Borough Green Road, which would undermine the wider Green Belt's integrity if not also removed. The removal of the sub-area would not otherwise contribute to an irregular pattern of development and would be in keeping with existing development form. The removal of the sub-area would impact the performance of the Green Belt to the south and west with regard to preventing sprawl as it would now be located at the settlement edge. However, as the Green Belt to the west already contains development, the sub-area is effectively enclosed on three sides and therefore in practice its removal would not significantly impact the surrounding Green Belt's role in preventing sprawl. The removal of the sub-area would also enclose an area of Green Belt to the south-east, however as this area already contains washed-over development this is not likely to materially impact its role in preventing sprawl or its sense of openness. As the sub-area is partially enclosed by the settlement of Wrotham and washed-over development to the west and south-east, its removal is not likely to bring significant new urbanising influences to the surrounding Green Belt and would not significantly undermine the wider Green Belt's sense of openness.

Overall, the sub-area plays an important role with respect to the Stage 1 parcel, but its release is unlikely to significantly harm the performance of the wider Green Belt.

### **Boundary Assessment**

Commentary on boundary features and impact on Green Belt boundary strength The inner boundary of the sub-area is readily recognisable and likely to be permanent. The outer boundary of the sub-area is readily recognisable but not necessarily likely to be permanent. If the sub-area was released, the new inner Green Belt boundary would not meet the NPPF definition. The new boundary would require strengthening.

### Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against the NPPF purposes but makes a less important contribution to the wider Green Belt. Recommended for further consideration with the sliver of Green Belt along Borough Green Road and Kemsing Road as RA-041.

### Recommended Area Map

### Legend



Recommended Areas



Recommended in Combination



Settlements



Local Authority Boundaries









The sub-area is bounded by woodland along the M20 to the north, by Nepicar Lane to the east, by the A20 (London Road) to the south, and by the edge of an area of woodland to the west. Inner boundaries: none. Outer boundaries: north, east, south, west.



Looking south-west from the east boundary of the sub-area, showing an area of overgrown hard standing and scrub.



Looking south-east from the north boundary of the sub-area, showing a field with overgrown building rubble.



Looking south-east from the north-west corner of the sub-area, showing an overgrown area of scrub.



Aerial photography used as a result of limited access to sub-area. (Bing Maps, July 2025).

Sub-area Assessment Summary

|                 | Purpose (a)   |               | Purpose (b) | Purpose (c) | Purpose (d) |
|-----------------|---------------|---------------|-------------|-------------|-------------|
| Sub-area scores | Criterion (a) | Criterion (b) | 0           | 4           | 0           |
|                 | NO            | 0             | U           | 4           | U           |

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

| (a) Land parcel is     |
|------------------------|
| located at the edge of |
| a large built-up area  |
|                        |
|                        |

The sub-area is not at the edge of a large built-up area in physical or perceptual terms.

(b) 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 durable boundary

The sub-area does not meet purpose (a).

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

Restricts development that would result in merging of or significant erosion of the gap between neighbouring builtup areas

Due to its distance from any relevant towns, the sub-area makes no discernible contribution to the separation of towns in physical or perceptual terms.

### Purpose (c) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development

The sub-area is not covered by any built form. The sub-area predominantly is covered by grassland with sporadic overgrown patches of rubble, and some trenches. Due to the sub-area's flat topography, there are limited views to the wider countryside. Overall, the sub-area has a strongly rural character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside

The sub-area performs strongly against the purposes overall. The sub-area performs strongly against purpose (c), and does not meet purposes (a), (b) or (d).

| Strategic Assessment           |               |               |             |             |             |  |
|--------------------------------|---------------|---------------|-------------|-------------|-------------|--|
| Stage 1<br>Parcel Scores (GBA) | Purpo         | ose (a)       | Purpose (b) | Purpose (c) | Purpose (d) |  |
| for parcel P6                  | Criterion (a) | Criterion (b) |             |             |             |  |
|                                | NO            | 0             | 3           | 3           | 0           |  |

### Assessment of wider impact

At a more granular level, the sub-area performs similarly against purposes (a) and (d) compared to the Stage 1 parcel, performs more weakly against purpose (b), and performs more strongly against purpose (c). The sub-area performs more weakly against purpose (b) as it is much smaller than the Stage 1 parcel, and therefore does not form a significant part of the gap between any two towns. The sub-area performs more strongly against purpose (c) because it is overall much less covered by development than the larger Stage 1 parcel and therefore has a more rural character.

The sub-area faces WR-05 across London Road to the south, and adjoins the wider Green Belt to the north, east and west. The removal of the sub-area in isolation would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt and contribute to an irregular pattern of development. The removal of the sub-area would impact the surrounding Green Belt's role with regard to preventing sprawl as it would now be located on the edge of the Green Belt. However, the M20 to the north forms a strong and prominent barrier to further sprawl in this direction, and the Green Belt to the south-east and south already contains significant washed-over development, so the sub-area's removal is not likely to significantly undermine overall the Green Belt's role in safeguarding the countryside from encroachment. Additionally, the sub-area has a strong sense of visual enclosure from mature treelines and woodland along all boundaries, particularly to the north and west, so the sub-area's removal is not likely to introduce new urbanising influences to the surrounding Green Belt, or undermine the wider Green Belt's openness.

Overall, the sub-area plays an important role with respect to the Stage 1 parcel, and its removal is likely to significantly harm the performance of the wider Green Belt.

### Commentary on boundary features and impact on Green Belt boundary strength Categorisation & Recommendation Sub-area category & recommendation The sub-area performs strongly against the NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.



The sub-area is bounded by the A20 (London Road) to the north, by mature and dispersed treelines to the north-east and east, by the edge of an area of woodland to the south-east and south, and by mature treelines to the west. Inner boundaries: none. Outer boundaries: north, east, south, west.



Looking south-west from the south-west edge of the sub-area, showing metal fencing, as well as a car park and some commercial buildings to the west.



Looking south from the northern boundary of the sub-area, showing an unclassified access road, and some commercial buildings.



Looking south-east from the end of the unclassified access road, into the sub-area, showing car parking, commercial and light industrial buildings.



Aerial photography used as a result of limited access to sub-area. (Bing Maps, July 2025).

Sub-area Assessment Summary

|                 | Purpose (a)   |               | Purpose (b) | Purpose (c) | Purpose (d) |
|-----------------|---------------|---------------|-------------|-------------|-------------|
| Sub-area scores | Criterion (a) | Criterion (b) | 0           | 1           | 0           |
|                 | NO            | 0             | U           | 1           | U           |

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

| (a) Land parcel is     |
|------------------------|
| located at the edge of |
| a large built-up area  |
|                        |

The sub-area is not at the edge of a large built-up area in physical or perceptual terms.

(b) 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 durable boundary

The sub-area does not meet purpose (a).

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

Restricts development that would result in merging of or significant erosion of the gap between neighbouring builtup areas

Due to its distance from any relevant towns, the sub-area makes no discernible contribution to the separation of towns in physical or perceptual terms.

### Purpose (c) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development NOTE: Unable to access the interior of the sub-area. This assessment has been completed largely from aerial photography.

Approximately 6% of the sub-area is covered by built form (excluding hardstanding). Built form consists of light industrial premises and associated buildings. The sub-area is predominantly covered by hardstanding associated with light industrial uses. There are significant urbanising influences from built form within the sub-area, and from development in the Green Belt to the east of the sub-area. Overall, the sub-area has a largely urban character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside

The sub-area performs weakly against the purposes overall. The sub-area performs weakly against purpose (c), and does not meet purposes (a), (b) or (d).

| Strategic Assessment           |               |               |             |             |             |  |
|--------------------------------|---------------|---------------|-------------|-------------|-------------|--|
| Stage 1<br>Parcel Scores (GBA) | Purpo         | ose (a)       | Purpose (b) | Purpose (c) | Purpose (d) |  |
| for parcel P6                  | Criterion (a) | Criterion (b) |             |             |             |  |
|                                | NO            | 0             | 3           | 3           | 0           |  |

### Assessment of wider impact

At a more granular level, the sub-area performs similarly against purposes (a) and (d) compared to the Stage 1 parcel, and performs more weakly against purposes (b) and (c). The sub-area performs more weakly against purpose (b) as it is much smaller than the Stage 1 parcel, and therefore does not form a significant part of the gap between any two towns. The sub-area performs more weakly against purpose (c) because it contains significant development and therefore has a less open and rural character than the larger Stage 1 parcel.

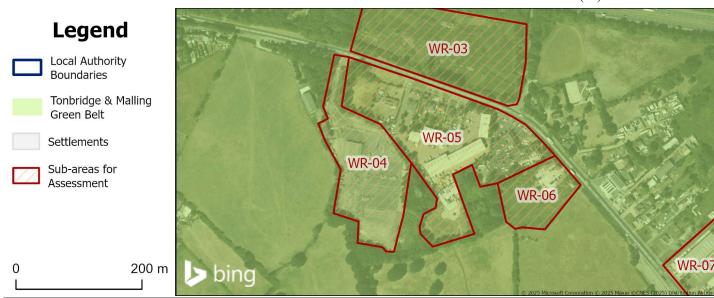
The sub-area adjoins WR-05 to the east, and the wider Green Belt to the north, south and west. The removal of the sub-area in isolation would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt. The removal of the sub-area would also impact the performance of the wider Green Belt in safeguarding the countryside from encroachment by contributing to an irregular pattern of development. The removal of the sub-area would impact the role of the surrounding Green Belt with regard to preventing sprawl, however as the sub-area is already significantly developed, in practice the surrounding Green Belt's role in this regard would not be materially impacted. As the sub-area is already significantly developed, it is an anomaly in the Green Belt and its removal in isolation is not likely to bring new urbanising influences to the surrounding Green Belt and would therefore not undermine the wider Green Belt's sense of openness.

In combination with WR-05, the removal of the sub-area would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt and contribute to an irregular pattern of development, undermining the wider Green Belt's overall role in safeguarding the countryside. The surrounding Green Belt's role with regard to preventing sprawl would also be impacted as it would now be located on the edge of the Green Belt. However, as both sub-areas are already significantly developed, their removal in combination is not likely to materially alter the role of the wider Green Belt in preventing sprawl, and is not likely to bring new urbanising influences to the surrounding Green Belt or undermine the wider Green Belt's openness.

In combination with a wider cluster of sub-areas (WR-05 and WR-06), the release of the sub-area would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt and contribute to an irregular pattern of development, undermining the wider Green Belt's overall roles in preventing sprawl and safeguarding the countryside. However, as the cluster is already significantly developed, its removal is not likely to significantly impact the role of the surrounding Green Belt with regards to preventing sprawl. As the cluster is largely developed, its removal is also not likely to bring significant new urbanising influences to the surrounding Green Belt, or significantly impact the wider Green Belt's openness or performance against purpose (c).

Overall, the sub-area plays a less important role with respect to the Stage 1 parcel but its removal in isolation or in combination with neighbouring sub-areas is likely to significantly harm the performance of the wider Green Belt.

# | Commentary on boundary features and impact on Green Belt boundary strength | There are no inner boundaries. The outer boundaries are predominantly not readily recognisable or necessarily likely to be permanent. If the sub-area was released the new inner Green Belt boundary would not meet the NPPF definition and would require strengthening. | Categorisation & Recommendation | Categorisation & Recommendation | The sub-area performs weakly against the NPPF purposes but makes an important contribution to the wider Green Belt. Not recommended for further consideration.



The sub-area is bounded by the A20 (London Road) to the north and north-east, by a dispersed tree line to the south-east, by the edge of an area of woodland and a mature tree line to the south and south-west, and by dispersed and mature tree lines to the west. Inner boundaries: none. Outer boundaries: north, east, south, west.



Looking south-east from within the sub-area, showing office and light industrial buildings and associated car parking.



Looking south from within the sub-area, showing a field behind metal fencing.



Looking south-east from an eastern point on the northern boundary, showing a pub and associated car parking.



Looking south-east from the northern boundary, showing residential buildings and associated car parking.

Sub-area Assessment Summary

|                 | Purpose (a)   |               | Purpose (b) | Purpose (c) | Purpose (d) |
|-----------------|---------------|---------------|-------------|-------------|-------------|
| Sub-area scores | Criterion (a) | Criterion (b) | 0           | 1           | 0           |
|                 | NO            | 0             |             |             |             |

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

| (a) Land parcel is     |
|------------------------|
| located at the edge of |
| a large built-up area  |
|                        |

The sub-area is not at the edge of a large built-up area in physical or perceptual terms.

(b) 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 durable boundary

The sub-area does not meet purpose (a).

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

Restricts development that would result in merging of or significant erosion of the gap between neighbouring builtup areas

Due to its distance from any relevant towns, the sub-area makes no discernible contribution to the separation of towns in physical or perceptual terms.

### Purpose (c) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development

Approximately 26% of the sub-area is covered by built form (excluding hardstanding). Built form consists of multiple commercial, industrial and residential units. Much of the sub-area is covered by hardstanding. There are strong urbanising influences from visual and physical connections with development to the east and west, and views to the wider countryside to the north and south are largely screened by mature treelines and patches of woodland, giving the sub-area a sense of enclosure. Overall, the sub-area has an urban character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside

The sub-area performs weakly against the purposes overall. The sub-area does not meet purposes (a), (b) and (d), and performs weakly against purpose (c).

| Strategic Assessment           |               |               |             |             |             |  |
|--------------------------------|---------------|---------------|-------------|-------------|-------------|--|
| Stage 1<br>Parcel Scores (GBA) | Purpo         | ose (a)       | Purpose (b) | Purpose (c) | Purpose (d) |  |
| for parcel P6                  | Criterion (a) | Criterion (b) |             |             |             |  |
|                                | NO            | 0             | 3           | 3           | 0           |  |

### Assessment of wider impact

At a more granular level, the sub-area performs similarly against purposes (a) and (d) compared to the Stage 1 parcel, and performs more weakly against purposes (b) and (c). The sub-area performs more weakly against purpose (b) as it is much smaller than the Stage 1 parcel, and therefore does not form a significant part of the gap between any two towns. The sub-area performs more weakly against purpose (c) because it contains significant development and therefore has a less open and rural character than the larger Stage 1 parcel.

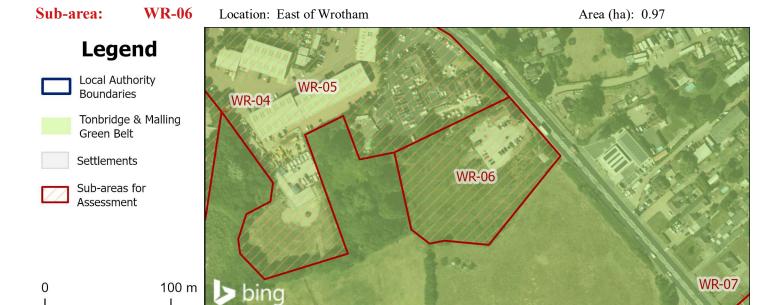
The sub-area adjoins WR-06 to the south-east and WR-04 to the west, faces WR-03 across the A20 (London Road) to the north, and adjoins the wider Green Belt to the north-east and south. The removal of the sub-area in isolation would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt. The removal of the sub-area would also impact the performance of the wider Green Belt in safeguarding the countryside from encroachment by contributing to an irregular pattern of development. The removal of the sub-area would impact the role of the surrounding Green Belt with regard to preventing sprawl, however as the sub-area is already significantly developed and is surrounded to the east, south-east and west by washed-over development, in practice the surrounding Green Belt's role in this regard would not be materially impacted. As the sub-area is also already significantly developed, it is an anomaly in the Green Belt and its removal in isolation is therefore not likely to bring new urbanising influences to the surrounding Green Belt or undermine the wider Green Belt's sense of openness.

The release of the sub-area in combination with either of WR-04 or WR-06 would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt and contribute to an irregular pattern of development, undermining the wider Green Belt's overall role in safeguarding the countryside. However, as both WR-04 and WR-06 already contain significant development, their removal alongside the sub-area is not likely to materially alter the role of the wider Green Belt in preventing sprawl. Existing development within both WR-04 and WR-06 make them anomalies in the Green Belt, so the removal of either of them alongside the sub-area would not be likely to introduce significant new urbanising influences to the surrounding Green Belt or undermine the wider Green Belt's openness. As WR-06 is overall less covered by development, particularly to the south-east, its removal alongside the sub-area would result in slight new urbanising influences being brought to the Green Belt to the south. However, this area is already subject to significant urbanising influences from development along the A20 (London Road ) to the north-east, so this is in practice not likely to significantly diminish the surrounding Green Belt's performance against purpose (c), or the wider Green Belt's overall sense of openness.

In combination with a wider cluster of sub-areas (WR-04 and WR-06), the release of the sub-area would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt and contribute to an irregular pattern of development, undermining the wider Green Belt's overall roles in preventing sprawl and safeguarding the countryside. However, as the cluster is already significantly developed, its removal is not likely to significantly impact the role of the surrounding Green Belt with regards to preventing sprawl. As the cluster is largely developed, its removal is also not likely to bring significant new urbanising influences to the surrounding Green Belt, or significantly impact the wider Green Belt's openness or performance against purpose (c).

Overall, the sub-area plays a less important role with respect to the Stage 1 parcel but its removal in isolation or in combination with neighbouring sub-areas is likely to significantly harm the performance of the wider Green Belt.

# | Commentary on boundary features and impact on Green Belt boundary strength | There are no inner boundaries. The outer boundaries are predominantly not readily recognisable or necessarily likely to be permanent. If the sub-area was released the new inner Green Belt boundary would not meet the NPPF definition and would require strengthening. | Categorisation & Recommendation | The sub-area performs weakly against the NPPF purposes but makes an important contribution to the wider Green Belt. Not recommended for further consideration.



The sub-area is bounded by a tree line to the north, the A20 (London Road) to the north-east, hedgerows and mature treelines to the south-east and south, and the edge of an area of woodland to the west. Inner boundaries: none. Outer boundaries: north, east, south, west.



Looking south-west from the north-eastern boundary along the A20, showing a car park.



Aerial photography used as a result of limited access to sub-area. (Bing Maps, July 2025).

Sub-area Assessment Summary

|                 | Purpose (a)   |               | Purpose (b) | Purpose (c) | Purpose (d) |
|-----------------|---------------|---------------|-------------|-------------|-------------|
| Sub-area scores | Criterion (a) | Criterion (b) | 0           | 2           | 0           |
|                 | NO            | 0             |             |             |             |

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

| (a) Land parcel is     |
|------------------------|
| located at the edge of |
| a large built-up area  |

The sub-area is not at the edge of a large built-up area in physical or perceptual terms.

(b) 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 durable boundary

The sub-area does not meet purpose (a).

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

Restricts development that would result in merging of or significant erosion of the gap between neighbouring builtup areas

Due to its distance from any relevant towns, the sub-area makes no discernible contribution to the separation of towns in physical or perceptual terms.

### Purpose (c) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development NOTE: Unable to access the interior of the sub-area. This assessment has been completed largely from aerial photography.

The sub-area is covered by approximately 2% built form (excluding hardstanding). Built form consists of a commercial building. The rest of the sub-area is covered by a car park, gardens, and an open field. There are urbanising influences from built form and associated hardstanding and managed gardens within the sub-area, as well as from built form within the Green Belt adjacent to the sub-area. Overall, the area has a semi-urban character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside

The sub-area performs weakly against the purposes overall. The sub-area does not meet purposes (a), (b) or (d) and performs weakly against purpose (c).

| Strategic Assessment                            |               |               |             |             |             |  |
|---|---------------|---------------|-------------|-------------|-------------|--|
| Stage 1<br>Parcel Scores (GBA)<br>for parcel P6 | Purpose (a)   |               | Purpose (b) | Purpose (c) | Purpose (d) |  |
|   | Criterion (a) | Criterion (b) |             |             |             |  |
|   | NO            | 0             | 3           | 3           | 0           |  |

### Assessment of wider impact

At a more granular level, the sub-area performs similarly against purposes (a) and (d) compared to the Stage 1 parcel, and performs more weakly against purposes (b) and (c). The sub-area performs more weakly against purpose (b) as it is much smaller than the Stage 1 parcel, and therefore does not form a significant part of the gap between any two towns. The sub-area performs more weakly against purpose (c) because it contains significant development and therefore has a less open and rural character than the larger Stage 1 parcel.

The sub-area adjoins WR-05 to the north and the wider Green Belt to the north-east, east, south and west. The removal of the sub-area in isolation would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt. The removal of the sub-area would also impact the performance of the wider Green Belt in safeguarding the countryside from encroachment by contributing to an irregular pattern of development. However, the release of the sub-area in isolation is unlikely to materially impact the performance of the wider Green Belt in preventing urban sprawl as it already contains development, and is bounded by washed-over development to the north and east. Existing development within the sub-area and within the Green Belt to the north and east also already contributes to a less open character and brings significant urbanising influences to the wider Green Belt, so the release of the sub-area is not likely to bring significant new urbanising influences in these directions. As the south-east of the sub-area is overall less covered by development, the sub-area's removal would result in slight new urbanising influences being brought to the Green Belt to the south. However, this area is already subject to significant urbanising influences from development along the A20 (London Road) to the north-east, so this is in practice not likely to significantly diminish the surrounding Green Belt's performance against purpose (c), or the wider Green Belt's overall sense of openness

The release of the sub-area in combination with WR-05 would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt and contribute to an irregular pattern of development, undermining the wider Green Belt's overall role in safeguarding the countryside. However, as WR-05 is already significantly developed, its removal alongside the sub-area is not likely to materially alter the role of the wider Green Belt in preventing sprawl. Existing development within the sub-area and WR-05 make them anomalies in the Green Belt, so the removal of the sub-areas in combination would not be likely to introduce significant new urbanising influences to the surrounding Green Belt or undermine the wider Green Belt's openness.

In combination with a wider cluster of sub-areas (WR-04, WR-05 and WR-06), the release of the sub-area would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt and contribute to an irregular pattern of development, undermining the wider Green Belt's overall roles in preventing sprawl and safeguarding the countryside. However, as the cluster is already significantly developed, its removal is not likely to significantly impact the role of the surrounding Green Belt with regards to preventing sprawl. As the cluster is largely developed, its removal is also not likely to bring significant new urbanising influences to the surrounding Green Belt, or significantly impact the wider Green Belt's openness or performance against purpose (c).

Overall, the sub-area plays a less important role with respect to the Stage 1 parcel but its removal in isolation or in combination with neighbouring sub-areas is likely to significantly harm the performance of the wider Green Belt.

## | Commentary on boundary features and impact on Green Belt boundary strength | There are no inner boundaries. The outer boundaries are predominantly readily recognisable but are not necessarily likely to be permanent. If the sub-area was released the new inner Green Belt boundary would not meet the NPPF definition and would require strengthening. | Categorisation & Recommendation | The sub-area performs weakly against the NPPF purposes but makes an important contribution to the wider recommendation | Green Belt. Not recommended for further consideration.



The sub-area is bounded by mature treelines and the edge of an area of woodland to the north and east, by the A20 (London Road) to the south and south-west, and by the regular edge of the Nepicar Park commercial estate to the north-west. Inner boundaries: none. Outer boundaries: north, east, south, west.



Looking north-east from the south boundary, showing light industrial buildings and a car park.



Looking south-west from the north boundary, showing an overgrown field



Looking south-east from the north-west the sub-area, a field with picnic bench, and some industrial buildings.



Looking north from the south-west boundary, showing industrial and warehouse buildings and a car park.

Sub-area Assessment Summary

|                 | Purpose (a)   |               | Purpose (b) | Purpose (c) | Purpose (d) |
|-----------------|---------------|---------------|-------------|-------------|-------------|
| Sub-area scores | Criterion (a) | Criterion (b) | 0           | 2           | 0           |
|                 | NO            | 0             |             |             |             |

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

| (a) Land parcel is<br>located at the edge of<br>a large built-up area | The sub-area is not at the edge of a large built-up area in physical or perceptual terms. |
|---|---|
| (b) Prevents the  | The sub-area does not meet purpose (a).   |
| outward, irregular  |   |
| spread of a large   |   |
| built-up area and   |   |
| serves as a barrier at  |   |
| the edge of a large   |   |

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

Restricts development that would result in merging of or significant erosion of the gap between neighbouring builtup areas

built-up area in the absence of another durable boundary

Due to its distance from any relevant towns, the sub-area makes no discernible contribution to the separation of towns in physical or perceptual terms.

### Purpose (c) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development

Approximately 18% of the sub-area is covered by built form (excluding hardstanding). Built form consists of commercial premises and warehouses. The rest of the sub-area consists of hardstanding associated with the business park, and areas of open field. There are significant urbanising influences from existing built form within the sub-area and in the adjacent Green Belt. Overall, the sub-area has a semi-urban character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside

The sub-area performs weakly against the purposes overall. The sub-area does not meet purposes (a), (b) or (d) and performs weakly against purpose (c).

| Strategic Assessment                            |               |               |             |             |             |  |
|---|---------------|---------------|-------------|-------------|-------------|--|
| Stage 1<br>Parcel Scores (GBA)<br>for parcel P7 | Purpose (a)   |               | Purpose (b) | Purpose (c) | Purpose (d) |  |
|   | Criterion (a) | Criterion (b) |             |             |             |  |
|   | NO            | 0             | 5           | 3           | 1           |  |

### Assessment of wider impact

At a more granular level, the sub-area performs similarly against purpose (a), and more weakly against purposes (b), (c) and (d) compared to the Stage 1 parcel. The sub-area performs a less important role against purpose (b) as it is much smaller than the Stage 1 parcel, and therefore does not form a significant part of the gap between any two towns. The sub-area performs more weakly against purpose (c) because it already contains significant development and is therefore less rural and open in character than the larger Stage 1 parcel. The sub-area performs more weakly against purpose (d) because it is not in proximity to any historic town, whereas the larger Stage 1 parcel extends to take in the context of West Malling.

The sub-area does not abut any other sub-areas, and is surrounded by the wider Green Belt to the north, east, south and west. The removal of the sub-area in isolation would create a 'hole' in the Green Belt, which would threaten the integrity of the wider Green Belt. The removal of the sub-area would also impact the performance of the wider Green Belt in safeguarding the countryside from encroachment by contributing to an irregular pattern of development. The removal of the sub-area would impact the role of the surrounding Green Belt with regard to preventing sprawl as it would now be located at the edge of the Green Belt. However, as the sub-area is already significantly developed and adjoins existing washed-over development to the north-west, and is also bounded by the M26 to the south and the A20 (London Road) to the west, in practice the surrounding Green Belt's role in this regard would not be materially impacted. Although parts of the sub-area to the north-east and south-east are less developed, the sub-area is strongly enclosed from the surrounding countryside by the M26 to the south and mature treelines to the north and east. Additionally, as the majority of the sub-area is already significantly developed, it is an anomaly in the Green Belt. The removal of the sub-area is therefore not likely to bring new urbanising influences to the surrounding Green Belt or undermine the wider Green Belt's sense of openness or performance against purpose (c).

Overall, the sub-area plays a less important role with respect to the Stage 1 parcel, but its release is likely to significantly harm the performance of the wider Green Belt.

### Commentary on boundary features and impact on Green Belt boundary strength Categorisation & Recommendation Categorisation & Recommendation The sub-area performs weakly against the NPPF purposes but makes an important contribution to the wider recommendation The sub-area performs weakly against the NPPF purposes but makes an important contribution to the wider Green Belt. Not recommended for further consideration.