

Green Gap Study

for Tonbridge & Malling Borough Council



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1. Introduction and Brief

1.1 This Green Gap Study (GGS) has been commissioned by Tonbridge & Malling Borough Council (T&MBC) as they prepare a new Local Plan. The purpose is to ascertain whether the designation of Green Gaps, and an associated policy to control development within them, could be justified.

1.2 The new Local Plan will replace the current Development Plan, which consists of: T&MBC Core Strategy, adopted in 2007; Development Land Allocations DPD, adopted in 2008; Tonbridge Central Area Action Plan, adopted in 2008; and the Managing Development and the Environment DPD, adopted in 2010.

1.3 National planning policy has evolved in the 18 years since the Core Strategy was adopted. The most significant evolution being the introduction of the National Planning Policy Framework (NPPF), initially in 2012. To be legally sound, a new plan must be prepared in accordance with the NPPF. Any local plan policy must comply with the NPPF.

1.4 The designation of Green Gaps, and policies to protect them, can help to avoid coalescence of settlements and preserve their separate identities and characters by maintaining open landscapes between them. Green Gaps can provide physical and visual breaks between built-up areas, contributing to the landscape quality of an area. As T&MBC looks to develop a spatial strategy for the development of the Borough to 2042, Green Gaps can provide a mechanism to proactively shape future development.

1.5 This GGS forms part the evidence base that informs the new Local Plan and is in three parts. The first part (includes chapters 2-7) investigates the role and validity of Green Gap policies by:

- Reviewing the history of the Strategic Gap in the Borough, as defined by Policy CP5 of the Core Strategy 2007.
- Reviewing the NPPF for emphasis regarding coalescence and protecting the identity of settlements.
- Reviewing relevant policies of contiguous local authorities.
- Discussing examples of adopted Green Gap policies, in other Local Plans, and how they are justified.
- Concluding as to whether a Green Gap policy could be justifiable under the current NPPF.
- Drawing on the above conclusions to consider where Green Gaps could be appropriately employed and justified in the Borough.

1.6 The second part (chapter 8) of the GGS considers the character and nature of the settlements outside of the National Landscapes and Green Belt and the development pressures settlements are experiencing, together with a review of the landscape between and around these settlements (utilising the Landscape Sensitivity Assessment¹ work being undertaken for the landscape evidence base) to explore where a Green Gap policy may be appropriate and justifiable. Settlements within the National Landscape and Green Belt have been scoped out because they are essentially protected from coalescence through policies associated with these designations. A four-stage approach has been applied:

- **Stage 1** considers the aims and objectives of a potential Green Gap policy and defines the key purposes of such a policy.
- **Stage 2** considers the various primary designations and planning constraints in the Borough (i.e. National Landscapes and Green Belt) and undertakes a high-level appraisal of the defined settlements outside these designated areas. The identifiable characteristics of these settlements are analysed, including their origins, scale, urban form, heritage value, landscape context and setting and the relationship of the character of the settlement to this. Stage 2 also reviews the pressure for development at these settlements and any drivers or constraints that increase pressure at particular settlement edges.
- **Stage 3** reviews the landscape sensitivity of the areas between identified settlements and draws conclusions as to the vulnerability of these landscapes to change brought about by potential new development.
- **Stage 4** concludes on the need for any development policy constraints, such as Green Gaps, between settlements.

1.7 The final part of the assessment (chapter 9) analyses the recommended Green Gap and assesses the boundaries and the landscape within it against key criteria established in the defined purposes of a potential Green Gap policy as set out at Stage 1.

¹ Landscape Sensitivity Assessment for Tonbridge & Malling Borough Council, 2025, Enplan-Binnies

2. National Planning Policy Context

2.1 To be legally sound, a new local plan must be prepared in accordance with the NPPF. Any policy within a local plan must comply with the NPPF. Understanding the parameters of the NPPF is of particular importance to the analysis of whether a Green Gap approach is justifiable.

2.2 The NPPF was first introduced in 2012 and last updated in February 2025. The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a national framework within which locally prepared plans can provide for housing and other development in a sustainable manner.

2.3 The NPPF confirms that the purpose of the planning system is to contribute to achieving sustainable development, which has three overarching objectives: economic, social and environmental. These overarching objectives are interdependent and to be pursued in mutually supportive ways. There is, however, a strong emphasis on supporting the Government's objective of significantly boosting the supply of homes.

2.4 The NPPF guides the selection of land to meet this objective and how most effective use should be made of available sites. The NPPF also guides what land should be protected and where limits to development should be applied.

2.5 Other than national planning guidance for the Green Belt, the NPPF includes no specific requirement to seek to prevent the coalescence of settlements to maintain their separate identities.

2.6 However, there is support in the NPPF for maintaining the identifiable characteristics of places, albeit that this is with regard to new development and the achieving of well-designed places. For example, paragraph 135 requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting; and to "establish or maintain a strong sense of place.....to create attractive, welcoming and distinctive place to live, work and visit". It would be reasonable to interpret that this emphasis allows for policies to protect what constitutes a distinctive place, including the relationship between built and landscape features.

3. History of the Strategic Gap in Tonbridge and Malling

3.1 The Borough contains a significant section of the former Mid Kent Strategic Gap, first designated in the 1996 Kent Structure Plan. The aim of the Strategic Gap was to prevent the coalescence of larger settlements (Maidstone, the Medway Gap urban area, and the Medway Towns). The Mid Kent Strategic Gap was carried through into the Kent and Medway Structure Plan 2006 and the South-East Plan 2009. The South-East Plan was revoked following the implementation of The Localism Act 2011. The Coalition Government of the time revoked regional strategies in favour of more localised plan-making.

3.2 T&MBC's Core Strategy 2007 addressed the Mid Kent Strategic Gap. Policy CP5 of the Core Strategy 2007 continued the aim of the Structure Plan and sought to restrict development in the areas between the built-up areas of the Medway Towns, Medway Gap and Maidstone.

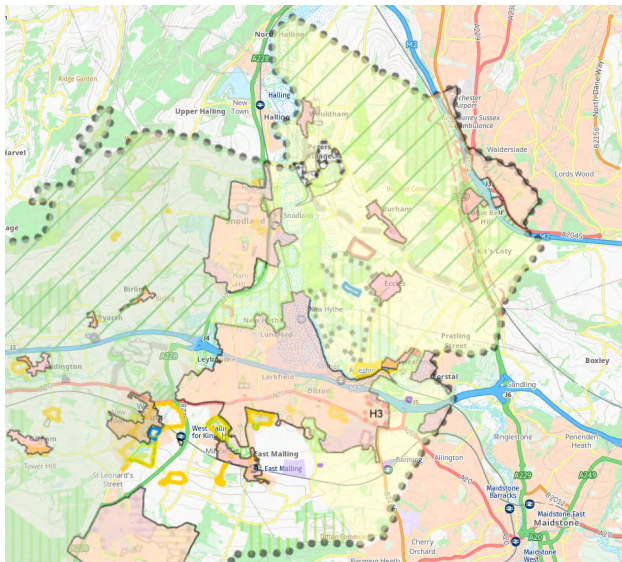


Figure 1: Extract T&MBC Proposals Map 2007: Strategic Gap shown in yellow shading

3.3 Policy CP5: Strategic Gap (refer to Figure 1) covers a wide area and adopts a relatively broad approach to restricting development. It states that:

Unless justified by special circumstances, development will not be proposed in the local development framework or otherwise permitted that would harm the function of the mid-Kent Strategic Gap as a physical break maintaining the separation and separate identities of the built-up areas of Maidstone, Medway Towns and the Medway Gap.

3.4 The policy text explains that special circumstances would include a shortfall in strategic housing provision sufficient to justify the release of additional land for residential development in the Bushey Wood Area of Opportunity.

3.5 The Core Strategy 2007 also includes Policy CP6: Separate Identity of Settlements that seeks to prevent settlements being joined together. Policy CP6 states that development will not be permitted within the countryside or on the edge of a settlement where it might unduly erode the separate identity of settlements or harm the setting of a settlement when viewed from the countryside.

3.6 The revocation of the South East Plan means that the Mid Kent Strategic Gap (which covered parts of separate boroughs) is outdated in policy terms. Consequently, Policy CP5 of the Core Strategy is also out of date as it relates to a regional policy that predates the NPPF. Therefore, in the context of the NPPF, the emerging Local Plan offers an opportunity to consider anew the issue of preserving identity and preventing coalescence.

4. Examples of Adopted Green Gap Policies

4.1 Green Gap policies have been included in recently adopted local plans in the South-East. For example, three local authorities in West Sussex, have Green Gap policies – Adur District Council, Worthing Borough Council and Arun District Council. The relevant development plan policies were adopted between 2017 – 2023 and are all, therefore, post the introduction of the NPPF. These authority areas include the extensive urban development along the coastal strip between Shoreham-by-Sea and Littlehampton. There are few, limited breaks between settlements along this part of the coastal strip. Undeveloped areas that remain, in between individual settlements, are protected by Green Gap policies in order to prevent the settlements coalescing. The Green Gaps of one authority often adjoin a Green Gap in the neighbouring authority area.

4.2 A further example can be found in Essex, where Tendring District Council adopted a Strategic Green Gaps policy in January 2022. Tendring District shares some similar spatial characteristics with Tonbridge & Malling. It has a main urban expanse, albeit formed of coastal towns, and riverside towns and a large rural heartland containing distinctive villages and hamlets of varying size. The western edge of the District borders the large town of Colchester, which exerts development pressure upon Tendring in a similar way to Maidstone upon Tonbridge & Malling. In the north-west of the District is the Dedham Vale National Landscape.

4.3 The reasons for the Green Gap policies, the relevant policy text and justification for them are considered below.

Worthing Borough Council's Local Green Gaps policy

4.4 The most recently adopted, and consequently most up to date, of the policies is that of Worthing Borough Council. The Worthing Local Plan 2020-2036 was adopted in March 2023. Policy SS5: Local Green Gaps is in place *'to avoid coalescence and preserve the separate characteristics and identities of different settlements by providing physical and visual breaks'*.

4.5 Four areas are designated as 'Local Green Gaps' (refer to Figure 2). Two are to the west of the Borough between Worthing and Ferring (partly within neighbouring Arun District). Two are to the east of the Borough between Worthing and Lancing / Sompting (partly within neighbouring Adur District).

4.6 The Local Green Gaps are open and either undeveloped or managed landscape for recreational use. The policy's supporting text describes how they provide for a sense of travelling between urban areas and form a critical component of Worthing's landscape setting. The designation of these gaps was informed by a Landscape and Ecology Study. Prior to the NPPF, the gaps had previously been protected by strategic regional policies, similar to the Mid Kent Strategic Gap. Some parts of the gaps are also designated as Local Green Spaces.

4.7 The text of policy SS5 states:
Outside of those areas designated as Local Green Spaces, all applications for development (including entry level exception sites) within Local Green Gaps must demonstrate that individually or cumulatively:
i) it would not undermine the physical and/or visual separation of settlements;
ii) it would not compromise the integrity of the gap;

iii) it conserves and enhances the benefits and services derived from the area's natural capital; and
iv) it conserves and enhances the area as part of a cohesive green infrastructure network.



Figure 2: Extract Worthing Local Plan Policy SS5– Local Green Gaps map

4. Examples of Adopted Green Gap Policies

4.8 The Local Green Gaps policy was tested by the Plan Inspector during the examination process. The Inspector asked specifically:

'Is the designation of Local Green Gaps (LGGs) positively prepared, justified and consistent with national policy? If so, have the boundaries of the LGGs been identified based on the robust, proportionate and up-to-date evidence and a consistent approach to selection?'

4.9 Key points raised by Worthing Borough Council in response to this query were that:

- A Local Green Gap policy could be considered to contribute to the social and environmental dimensions of sustainability.
- The Council carefully considered the requirement of NPPF paragraph 174¹, which explains the importance of conserving and enhancing the natural environment, in terms of place making.
- The importance of the gaps and open space in relation to the settlements cannot be separated and is integral to planning and good design.
- The Council focused on the protection of 'valued' and 'distinctive' landscapes.
- The Council commissioned independent, robust evidence to review and consider this form of designation. The landscape structure, landscape characterisation and visual context was assessed in relation to policy function, i.e. the prevention of coalescence and maintenance of setting and separate identity of settlements.

4.10 The Inspector also asked:

'Policy SS5 indicates that development within the LGGs will only be permitted in exceptional circumstances. There appear to be no exceptions to this requirement. Is this approach justified for all potential forms of development?'

4.11 The key points of the Council's response were:

- The gaps have not been treated as an absolute constraint to development.
- The Council did not want to be prescriptive by specifying which types of development will need to be assessed against the policy.
- Historically, very few proposals have come forward requiring a countryside location and agriculture is not a major land use in Worthing, as it is an urban borough with limited agricultural land.
- The policy enables flexibility for all types of development proposals to be considered and be treated on their own merits.

4.12 The subsequent adoption of Worthing's Local Green Gaps policy demonstrates that an evidence-based assessment of the social and environmental value of a Green Gap can result in a justifiable policy.

¹ Now Paragraph 187.

4. Examples of Adopted Green Gap Policies

Adur District Council's Local Green Gaps policy

4.13 Worthing's easterly neighbour, Adur District Council, adopted a similar Green Gap policy in the Adur Local Plan 2017. Spatial gaps to the west of the District between Lancing/Sompting and Worthing and to the east between Lancing and Shoreham-by-Sea are protected to avoid coalescence of settlements (refer to Figure 3). Similar gaps in between these settlements were safeguarded from development by former strategic gaps in the now revoked West Sussex Structure Plan.

4.14 Policy 14: Local Green Gaps states:

Local Green Gaps between the settlements of Lancing / Sompting – Worthing, and Lancing – Shoreham-by-Sea, (as shown on the Policies Map), will be protected in order to retain the separate identities and avoid coalescence of these settlements. Within these areas any development permitted must be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the coalescence of settlements.

4.15 Notably, the boundaries of the former strategic gaps were adjusted to accommodate large strategic allocations (both residential and commercial). The residential allocations filled in undeveloped areas to the edges of the settlements, proactively managing the development of these areas and controlling future expansion.

4.16 The Local Green Gaps policy is linked to Policy 13: Adur's Countryside and Coast. The supporting text of Policy 13 discusses the rationale behind the protection of the gaps. It notes that the gaps were designated to avoid coalescence and preserve the separate characters and identities of Adur's settlements by providing physical and visual breaks. This is considered particularly important given the compact nature of Adur and its location within the wider Brighton conurbation.

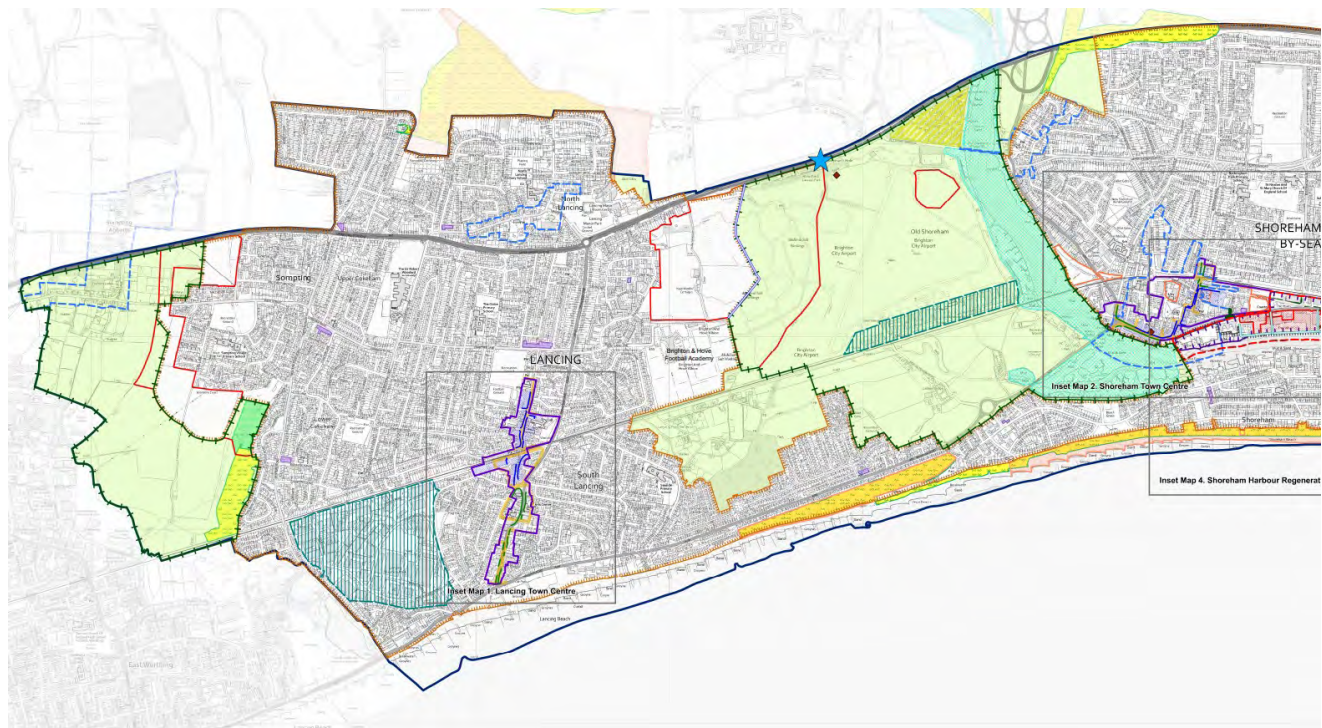


Figure 3: Adur Local Plan Policies Map (Local Green Gaps identified by green hatched line / site allocations by red lines)

4.17 The identified characteristics of the gaps in Adur referred to in Policy 13 are:

The open and undeveloped character of the land (this does not relate to landscape quality although some areas of the gaps may happen to be of good quality);

- They form a visual break between settlements – actual and perceived (from physical development or level of activity);
- They create a sense of travelling between settlements;
- Their boundaries follow physical features on the ground, taking account of the need to accommo-

date development requirements of the Plan;

- Only land necessary to secure the objectives of gaps on a long term basis has been included in these gaps.

4.18 The gaps are recognised as critically important components of the landscape setting of Sompting, Lancing and Shoreham-by-Sea, contributing to their individual character and identity.

4.19 The Adur Local Plan attaches great importance to protecting and where possible enhancing the distinctive

4. Examples of Adopted Green Gap Policies

character of these areas and settlements. At the same time, in terms of justification, the Local Plan has adjusted the former boundaries of the gaps to allow appropriate development to come forward. Amendments to the built-up area boundary were proposed to include the allocated sites. The sites allocated within the former gaps were seen as providing opportunities to enhance green infrastructure, improve areas identified as poor urban fringe and improve access to open areas.

4.20 Adur commissioned a Landscape Study Update as part of the plan-making process and to inform Policy 14. The Study assessed the varied landscape character areas in the District and recognised the importance of the gaps in preventing coalescence.

4.21 During the Local Plan Examination, the Inspector expressed some doubts as to the Council's approach to Green Gaps. The Inspector was unconvinced that certain included areas would make a significant contribution to preventing coalescence. The Council responded that the sites in question made significant contributions to the landscape setting of their respective settlements but agreed to exclude them. It was conceded that the aim of the policy was to prevent coalescence and not provide a distinctive landscape setting to settlements.

4.22 Notable points from Adur's policy are the visual breaks between settlements and sense of travelling from one to another. Adjustments were made to the former boundaries of strategic gaps to include strategic developments in preferred locations. Only areas that meet the defined purpose of the Local Green Gap were included following comments made by the Local Plan Inspector.

Arun District Council's 'Gaps between Settlements' policy

4.23 Worthing's westerly neighbour, Arun District Council, adopted a 'Gaps between Settlements' policy as part of the Arun Local Plan 2011 - 2031 in 2018. Ten spatial gaps separating the main settlements of the District were designated and are protected by Policy SD SP3: Gaps Between Settlements (refer to Figure 4). The countryside breaks between the settlements of Worthing and Adur have strong similarities, being relatively compact, well-defined areas between settlements, across which there is intervisibility from one settlement to another, and with the coast to the south and often the South Downs National Park to the north. However, Arun's breaks are generally much larger tracts of landscape that are less clearly defined and where there is limited or no intervisibility.

4.24 Nonetheless, the Gaps between Settlements policy has the same aim as the Worthing and Adur Green Gaps policies, i.e. that of preventing the coalescence and retaining the separate identities of:

- Worthing to Ferring
- East Preston to Ferring
- Littlehampton and Middleton-on-Sea
- Pagham to Selsey
- Bognor Regis to Chichester
- Arundel to Littlehampton
- Angmering to Rustington / East Preston
- Angmering to Worthing
- Felpham to Bognor Regis
- Barnham to Walberton

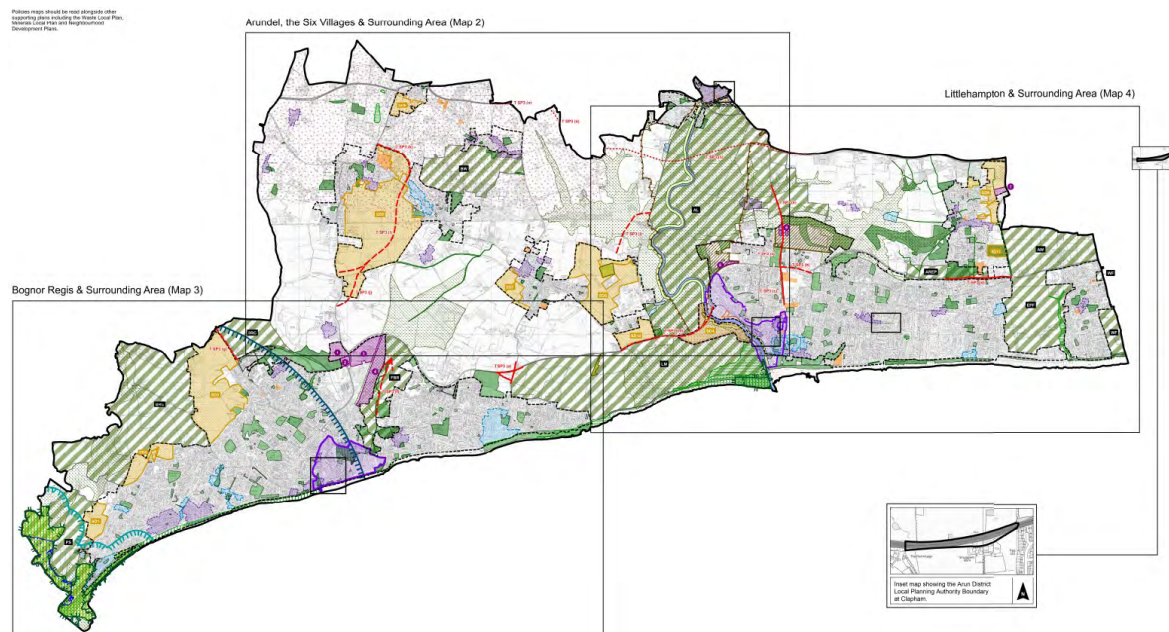


Figure 4: Arun Local Plan Policies Map (Gaps between Settlements indicated by green-white diagonal lines)

4. Examples of Adopted Green Gap Policies

4.25 Policy SD SP3 states that development is only permitted within the gaps if:

- It would not undermine the physical and / or visual separation of settlements;
- It would not compromise the integrity of the gap, either individually or cumulatively with the other existing or proposed development;
- It cannot be located elsewhere; and
- It maintains the character of the undeveloped coast;
- Or, if a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.

4.26 The supporting text of Policy SD SP3 sets out key factors of, and the rationale behind the policy. It notes that:

- It is important to retain the settlement structure of Arun District and recognise the value of gaps for preventing the coalescence of individual settlements and for retaining the separate identity and amenity of settlements.
- The principle of a gap policy is well established within West Sussex Development Plans and were included within the most recent West Sussex Structure Plan (2001-2016).
- This policy approach is not intended to protect the Countryside or Landscape (which have their own policies), but rather as a planning tool designed to shape patterns of towns and villages. A break between settlements helps to maintain a 'sense of place'.
- The designation of gaps is not intended to rule out all development but to allow for appropriate, small scale development in keeping with the rural nature of the gaps.

- The boundaries of settlement gaps are to be regularly reviewed to ensure they are up-to-date and do not restrict development that has been identified as an appropriate alternative.

4.27 The Inspector considered Arun's gaps policy through the Local Plan examination. The Inspector remarked that the 'Gaps between Settlements' policy provides an additional layer of protection over countryside policies. They acknowledged that these areas of countryside were important in maintaining the separate identities of settlements, providing visual separation between built-up areas.

4.28 The Inspector discussed that some of the gaps involve considerable tracts of land, such that settlements are not inter-visible nor threatened by coalescence. However, the Council's acceptance that future development needs could be met in the gaps provided that their overall integrity was maintained was considered to be justified by the Inspector. The Inspector concluded that the principle of the policy and gaps included within it were sound.

4. Examples of Adopted Green Gap Policies

Tendring District Council's 'Strategic Green Gaps' policy

4.29 In Tendring, defined gaps between settlements to guard against coalescence were originally made in the Council's 1998 Local Plan – then known as 'Local Green Wedges'. These areas were generally carried forward into the 2007 Local Plan but renamed 'Local Green Gaps'. Their purpose was to maintain separation between the main urban areas of the District and the smaller settlements that surround them.

4.30 As part of the preparation of the Tendring District Local Plan 2013 – 2033, the areas were reviewed as part of a Strategic Green Gaps Review (prepared by LUC: 2020) and assessed for retention within the new spatial strategy. Despite the change of name, the function of the Strategic Green Gaps essentially remained the same – to guard against the coalescence of settlements and prevent the erosion of their separate identities.

4.31 Six Strategic Green Gaps were adjusted to account for contemporary development pressures and adopted as part of Policy PPL 6 of the Local Plan 2013 – 2033 (adopted in 2022). The Green Gaps (refer to Figure 5) were defined between:

- Clacton to Little Clacton
- Between Clacton and Holland-on-Sea
- Land between Clacton and Jaywick
- Land between Dovercourt, Ramsey, Little Oakley and Parkeston
- Land between Frinton, Walton, Kirkby Cross and Kirkby-le-Soken
- Lawford, Manningtree and Mistley

4.32 Policy PPL 6: Strategic Green Gaps states: 'The Strategic Green Gaps as shown on the Policies Maps and Local Maps will be protected in order to retain the separate identity and prevent coalescence of settlements.'

Any development permitted must be consistent with other policies in the plan and must not (individually or cumulatively) lead to the coalescence of settlements.'

4.33 The supporting text relays the rationale of the policy noting that:

Strategic Green Gaps have been identified in this local plan in specific locations between settlements. The Strategic Green Gaps are valued for the role they will play

in preventing the coalescence of settlements and retaining the distinct identity of settlements. The areas identified have the following characteristics

- The open and undeveloped character of the land;
- They form a visual break between settlements;
- Their boundaries follow physical features on the ground floor; and/or
- Only land required to secure the objectives of the Strategic Green Gaps has been included.

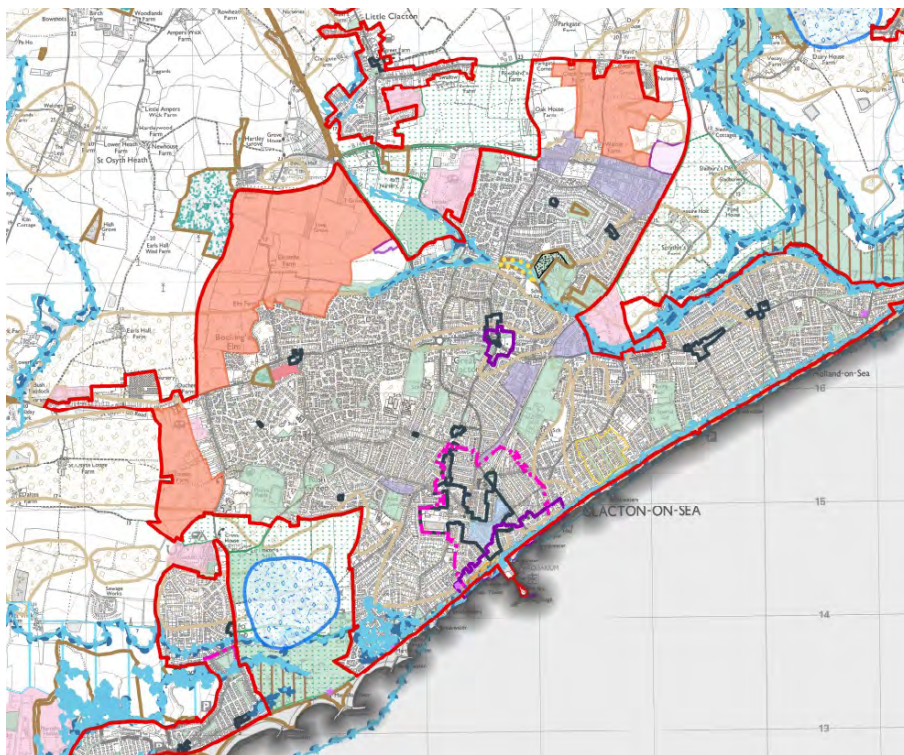


Figure 5: Extract Tendring District Local Plan Policies Map 2 – South East Tendring (Strategic Green Gaps between Clacton and Little Clacton and Clacton and Holland on Sea identified by green dots)

4. Examples of Adopted Green Gap Policies

4.34 Through the Local Plan examination, the Planning Inspectors reported to the Council that the Strategic Green Gaps formed part of a soundly based strategy to protect the quality of the District's special natural and built environment. The Inspectors noted that the robust assessment of the pre-existing gaps provided comprehensive analysis of the reasons for their retention and proposed alteration. However, the proposed policy text was deemed unclear as to the reasons for designation and what the policy sought to achieve.

4.35 The Inspectors put forward modifications necessary in order for the policy to be effective. The modifications changed the supporting text wording from 'the primary purpose of this designation is to maintain an appropriate degree of separation between nearby settlements or neighbourhoods' to that quoted at paragraph 5.34. The text of the policy was also changed to be more concise and emphasise the aim to retain the separate identity and prevent coalescence of settlements.

5. Review of Contiguous Local Authorities

5.1 Reviewing other local plans is a useful means of establishing whether certain policies can be justified. To this end, the local plans of the local planning authorities (LPAs) contiguous with Tonbridge & Malling Borough have been reviewed for Green Gap, or similar policies. These LPA areas share some broad characteristics with the Borough. They all have large urban and large countryside areas covered, to greater or lesser degree by 'higher-level' designations, i.e. National Landscapes and Green Belt. However, some countryside areas of the Borough, that are not covered by the higher-level designations lie between settlements that are physically close and where, typically, development pressure is at its greatest. These circumstances of the close physical proximity of settlements and significant development pressure at these settlements are not unique to the Borough, but they are arguably more pronounced here than in any of the other contiguous authorities.

5.2 The relevant LPA areas are Sevenoaks District; Tunbridge Wells Borough; Maidstone Borough; Medway Council and Gravesham Borough (refer to Figure 6).

5.3 None of these LPAs currently have adopted Green Gap policies, although they do have a combination of 'green corridor', 'green infrastructure' and 'green grid policies' within their local plans. Such policies seek in-part to protect undeveloped spaces within and around settlements but do not explicitly seek to prevent coalescence. Considering why Green Gap policies are absent from these contiguous plans can help to highlight the particular conditions found in parts of the Borough and the relevance of the application of such a policy.

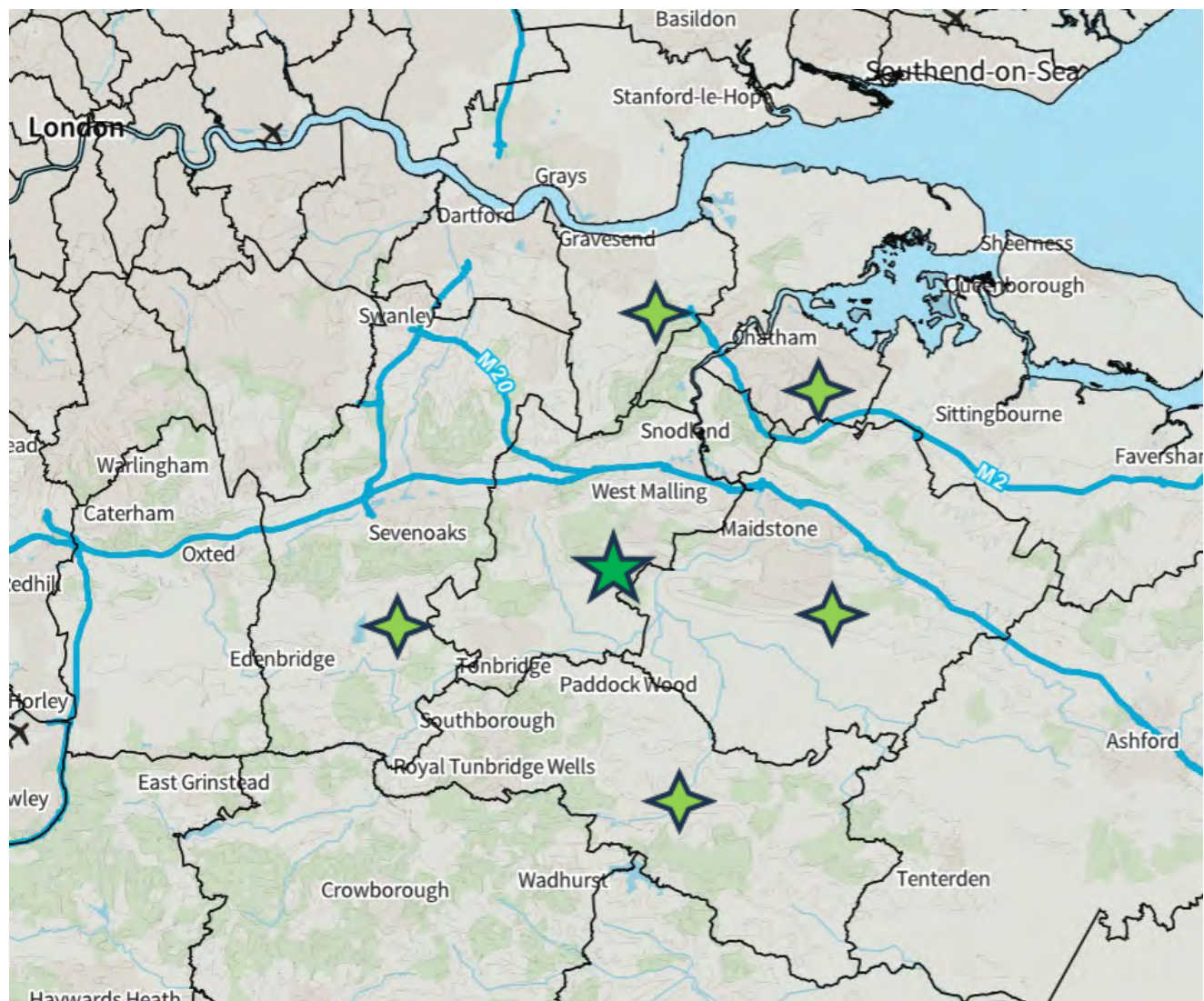


Figure 6: Contiguous Local Authorities (extract planning data map: Gov.uk)

5. Review of Contiguous Local Authorities

5.4 Sevenoaks District to the west of Tonbridge & Malling is almost entirely covered by Green Belt, with 93% of its land covered by this designation. The Green Belt bounds the main urban areas. Much of the northern part of the District is also within the Kent Downs National Landscape. Consequently, there is little need for a further policy of constraint to prevent coalescence. Neither the Core Strategy (2011) nor the Allocations and Development Management Plan 2015 contain a Green Gap or similar policy. A third iteration of the Sevenoaks Draft Local Plan (Regulation 18) was published for consultation in October 2025. There is no Green Gap (or similar) policy within the emerging local plan.

5.5 Tunbridge Wells Borough is to the south and south-east of Tonbridge & Malling. The western section around the main town of Royal Tunbridge Wells is Green Belt (22% of the Borough). The eastern section of the Borough is largely covered by parts of the High Weald National Landscape (70% of the Borough). Over 90% of the Borough is subject to these higher-level policy constraints which restrain development and help to prevent coalescence. Neither the 2006 Local Plan or Core Strategy (2010) contain a Green Gap or similar policy. There are policies related to the Green Belt and the 'rural fringe' land on the edge of urban areas reserved from the Green Belt for future long-term development needs. The submission version of the Local Plan (2021) also does not include a Green Gap or similar draft policy.

5.6 Maidstone Borough is to the east of Tonbridge & Malling Borough. The principal town abuts the authority boundary with Tonbridge & Malling Borough and effectively adjoins the Medway Gap urban area. The other smaller towns of Maidstone Borough are distant from the town of Maidstone and within the southern

and eastern parts of the Borough. Accordingly, there is limited potential for the coalescence of Maidstone with these smaller settlements and the loss of their separate identities. Only a small section of the Borough is within the Green Belt. The Kent Downs National Landscape covers the northern part of the Borough (some 27%). It is more urban-centric than the other contiguous authority areas. The Local Plan Review 2021-2038 (adopted March 2024) does not contain a Green Gap or similar policy. The Local Plan Review does contain policies that protect green and blue infrastructure (networks of natural and semi-natural spaces) and landscapes of local value.

5.7 Medway Council is to the north-east of Tonbridge & Malling and extends up to the Thames Estuary. The main built-up area of Rochester and Chatham lies between the River Medway and M2 motorway. Five historically separate towns have now effectively coalesced into a single large conurbation. The western-most part of the authority's area is within the Green Belt. The Kent Downs National Landscape covers the southern part of the authority's area. The Medway Local Plan 2003 contains a Strategic Gap policy (Policy BNE31: Strategic Gap) which relates to remnants of the same Mid-Kent Strategic Gap in Tonbridge & Malling. The Local Plan also contains an Area of Local Landscape Importance policy (Policy BNE34) which protects locally valued landscape outside of the Green Belt and National Landscape. However, these policies are not currently being carried forward into the emerging Local Plan. The Regulation 19 consultation document was published in June 2025. There is no draft policy relating to Strategic or Green Gaps, although there is reference to the broad principle of countryside to the north of the main urban area as having the role a strategic gap.

5.8 Gravesham Borough lies to the north-west of Tonbridge & Malling. Outside the large urban areas of Gravesend and Northfleet the Borough is predominantly rural. The A2 dual carriageway aligns east-west through the Borough, providing a 'defensible' boundary between the urban north and rural south. Some 78% of the Borough is designated as Green Belt, with much of this area to the south of the A2 also being within the Kent Downs National Landscape. The Core Strategy (2014) does not contain any Green Gap policies. There is a policy relating to Green Infrastructure (Policy CS12) which confirms a long-term ambition for a connected green grid and green corridors throughout the Borough.

6. Conclusions on the Principle of Green Gap Policies

6.1 This GGS considers that, in principle, a Green Gap policy is justified and shown to comply with the NPPF.

6.2 The NPPF requires development to be sympathetic to local character and history, support a sense of place and achieve the creation of distinctive places. If the characters of settlements in an area are distinct, and coalescence (or the process of coalescence) would erode their separate identities, directing development in a way that avoids closing identifiable gaps between settlements can be justified.

6.3 When considering a Green Gap approach, it is useful to understand why T&MBC's contiguous LPAs do not have Green Gap policies and the key differences between these LPAs and T&MBC in this regard. Sevenoaks and Tunbridge Wells have especially high levels of coverage by Green Belt and National Landscape, and their respective larger settlements are substantially contained by these constraints. Historically and largely as a consequence of the above, pressure for coalescence between the larger and other settlements within their respective boundaries has been prevented. Gravesham has large areas of Green Belt and National Landscape coverage, although less than Sevenoaks and Tunbridge Wells, but its larger settlements are also contained by Green Belt. Within Maidstone Borough the main town of Maidstone is constrained by its boundaries with other authorities, and it is, in any case, distant from smaller settlements that are within the Borough. Medway's main settlements have already effectively coalesced and the south and west of the Council's area are constrained by Green Belt and National Landscape respectively. Also, like Maidstone, its larger settlements are distant from its smaller settlements in the 'unconstrained' area to the north.

6.4 Tonbridge & Malling also has large areas within the Green Belt (71%) and National Landscapes (27%); much of which overlap. An essential difference with its contiguous authorities, however, is the proximity of larger settlements within the areas unconstrained by primary designations. Within Tonbridge & Malling the relatively unconstrained area adjoins the edges of larger settlements and has several smaller settlements within it, all with separate identities and comparatively close to each other.

6.5 Examples of adopted Local Green Gap and Gaps between Settlements policies highlight important factors regarding the soundness of potential Green Gaps. Worthing Borough justified their policy as a contributor to social and environmental sustainability and stressed that gaps and open space between settlements are integral to planning and good design. In Adur District the gap policy emphasises visual breaks between settlements and a sense of travelling from one settlement to another. Adjustments were made to the former boundaries of Strategic Gaps within Adur to include strategic developments in preferred locations. Whilst only areas that meet the defined purpose of the Local Green Gap were included.

6.6 Notable points from Arun's policy include the use of gaps as a planning tool to maintain the settlement structure of the district and shape the development patterns of towns and villages. Arun highlighted that breaks between settlements help maintain a sense of place. Arun's Gaps between Settlements policy shows that gaps can be justified across large tracts of land and that settlements do not need to be intervisible across gaps. The key factor being that the land designated within a gap needs to play a legible role in maintaining the separate identities of settlements by providing visual and physical separation.

6.7 The Inspectors' modifications to the text of Tendring District's Strategic Green Gaps policy shows that clarity of purpose must be expressed in relation to the designation of Green Gaps. What the policy seeks to achieve, in this case, should be readily apparent and should focus on the prevention of coalescence of settlements and retaining distinct identities.

6.8 Importantly, each of these authorities recognised that gaps do not rule out development within gap areas but allow for better management of development and schemes which do not harm the integrity of the gap. To be justifiable a Green Gap policy must have clearly defined purposes, for instance to prevent coalescence and maintain separate identities of settlements.

6.9 Green Gaps should have clearly defined boundaries, which, where possible, follow physical features on the ground to ensure they are legible and emphasise their role in defining settlement edges. They should be informed by landscape analysis of the sensitivity to change; the fragility and susceptibility of a gap to erosion; visual breaks between settlements; and where there is a sense of travelling from one settlement to another. Only land necessary to secure the objectives of the gap should be included.

6.10 Green Gap policies should also allow for development that does not compromise the aim of a gap. In this way, the LPA can allow for the allocation of land for future development when defining the boundaries of a gap, through the wording of the related policy allow for future development within a gap where appropriate,

6. Conclusions on the Principle of Green Gap Policies

direct strategic allocations to preferred areas away from a gap and manage (through planning decisions) the evolution of settlement edges within a gap in a way that is sympathetic to the distinctiveness of place.

6.11 The purpose of a Green Gap in Tonbridge & Malling could be similar to that of the former Strategic Gap. Whereas the Strategic Gap has a broad purpose to restrict development across a wide area between the Medway Valley settlements and the Medway Towns, a Green Gap would be more refined, local in scale and related to protecting the identifiable and valued characteristics of specific settlements.

7. Green Gap Assessment

7.1 Drawing on the conclusions from chapter 7, this GGS explores if and where Green Gaps may be justified within Tonbridge & Malling Borough. The findings of the Landscape Sensitivity Assessment¹ have also been considered and have informed the analysis. The four-stage approach, as discussed in chapter 1, is employed:

- Stage 1: Define the Purposes of a Green Gap
- Stage 2: High-level assessment of settlements outside of National Landscapes and Green Belt
- Stage 3: Landscape sensitivity assessment of areas between settlements
- Stage 4: Review and Recommendations

Stage 1: Define the Purposes of a Green Gap

7.2 Stage 1 considers the aims and objectives of a potential Green Gap policy and seeks to define the key purposes of a Green Gap. The potential for Green Gaps between settlements will be assessed against the following three purposes which have been developed through the review of similar existing Local Plan policies and their supporting text:

1. To maintain the landscape between neighbouring settlements as open to prevent merging / coalescence and the process of merging, to protect the setting, separate identity and character of these settlements.
2. To support the appreciation and wider perceptual benefits of open countryside close to settlements.
3. To maintain the existing or influence the future form and boundaries of settlements.

Stage 2: High-level assessment of Settlements outside of National Landscapes and Green Belt

7.3 Green Gaps would not be justifiable within the areas of the Borough designated as Green Belt or the National Landscapes of the High Weald and Kent Downs. Settlements within these areas are already largely protected from coalescence through significant development constraints associated with Green Belt and designated landscape policies, both national and local.

7.4 Therefore, the focus of any justifiable Green Gaps is around settlements outside of the Green Belt and National Landscapes. The high-level assessment analyses the character of these settlements to ascertain whether these settlements have distinct and separate identities that could justify the need for protection from coalescence.

7.5 The recognised settlements outside of the Green Belt and National Landscapes are listed in order of their place in the Settlement Hierarchy of the new Local Plan:

- Medway Gap
- Kings Hill
- West Malling
- East Malling
- Wouldham
- Aylesford village
- Eccles
- Burham
- Peters Village

7.6 The identifiable characteristics of these settlements are analysed, including their origins; scale; urban form; heritage value; landscape context and setting and the relationship of the character of the settlement to this. The pressure for development at settlement edges and drivers and constraints that increase pressure are considered.

¹ Landscape Sensitivity Assessment for Tonbridge & Malling Borough Council, 2025, Enplan-Binnies

7. Green Gap Assessment

Medway Gap settlements

7.7 The Medway Gap settlements (the 'Medway Gap') are a large urban expanse comprising expanded formerly separate settlements that have coalesced, i.e. Ditton, Larkfield and Leybourne, with newer urban expansions such as New Hythe and Lunsford. The combined settlement is dissected east-west by the M20 motorway but to which there is ready access via Junctions 4 and 5. Medway Gap is Tier 1 in the Borough's settlement hierarchy.

7.8 The majority of development has taken place since World War II. The Medway Gap is largely characterised by suburbs of mid to late 20th Century housing at a predominantly two-storey scale adjoining large scale employment uses alongside the River Medway at New Hythe and in the south-east at South Aylesford. The suburbs are arranged on looping, indirect streets and cul-de-sacs without any clear cultural or civic focal point; partly a product of previous coalescence.

7.9 The attractive centres of the former villages remain within the urban area and are designated as Conservation Areas. These village remnants retain strong characteristics but are largely surrounded by more commonplace later development.

7.10 A collection of lakes surrounds the settlement to the north-west. Formerly the result of mineral extraction, these lakes are now used for fishing, watersports and recreation. The River Medway and its floodplain lie to the north-east. The river, floodplain and the lakes combine to prevent any significant further expansion of Medway Gap to the north of the M20.

7.11 The south-east edge of the settlements lies close to the Borough boundary and the north-west corner of Maidstone. Recently implemented residential planning consents in the vicinity of Barming Station mean that Medway Gap will have effectively merged with Maidstone once these developments are complete.

7.12 To the west of Leybourne, the settlement boundary between the M20 in the north and the A20 to the south, is bordered by a further lake and by Green Belt.

7.13 The remaining boundary of Medway Gap to the south-west at Leybourne and to the south of Ditton is undergoing change. Newly completed and recently implemented residential consents at Leybourne and Ditton on greenfield sites are expanding the settlement to the south.

7.14 The presence of significant employment, retail, services, education, leisure and community uses, as well as access to the M20 for commuting, means that there will be continued pressure for development expansion of Medway Gap. Physical constraints to the north and the presence of Maidstone to the south-east mean that this pressure is largely focussed on the countryside to the south.



Figure 7: Aerial image of Medway Gap settlements (Google Earth)

7. Green Gap Assessment

Kings Hill

7.15 Kings Hill is Tier 2 in the settlement hierarchy of the Borough. This relatively modern 'garden settlement' began development in the late 1980s on the site of the former RAF West Malling Airfield. Kings Hill has a population of circa 9,500.

7.16 The town is a large mixed-use late 20th Century garden settlement. The development parcels were designed by different architects and built by several developers. The parcels contain varied traditional style housing designs at a predominantly two-storey scale, built and detailed to a high standard. Housing neighbourhoods are focussed on landscaped spaces and intersecting roads with different parcels separated by belts of trees.

7.17 The town is centred around a commercial and retail district with a well-populated office complex around Churchill Square. Some notable national companies have their regional head offices to the north of this commercial district. A cricket club, golf club and sports park are integrated with the southern and eastern edges of Kings Hill emphasising the presence of sport and active lifestyles.

7.18 Kings Hill is centrally located within the Borough with access via the A26 and A228 to Tonbridge to the south and the M20 motorway to the north.

7.19 The town's western and southern boundaries are defined by the presence of Green Belt. Major extensions within the northern part of the town and some at the northern edge are ongoing with further major sites being promoted between Kings Hill and East Malling and West Malling beyond the former MoD airfield site. Land to the east of the town is largely contained by the Kings Hill Sports Club and by existing woodland.



Figure 8: Aerial image of Kings Hill settlement (Google Earth)

7. Green Gap Assessment

West Malling

7.20 West Malling is Tier 2 settlement in the Borough's hierarchy. It lies to the west of the A228, to the north of Kings Hill and to the south-west of Leybourne that forms part of Medway Gap. It has a population of some 3,000 people. The landscape around West Malling is characterised by its gently rolling landform, horticultural and arable farming and historic parkland landscapes.

7.21 This is an historic market town, with its origins related to a monastic foundation, possibly from as early as 699AD, as a Benedictine Nunnery at St Mary's Abbey and the fortified St Leonard's Tower. It was a focus for trade and has historic associations with tanning, brewing and paper making. The town is centred on the historic core of the broad High Street, Swan Street, King Street, Town Hill and the eastern part of West Street. The West Malling Conservation Area includes this area, together with St Mary's Abbey to the east and Douces Manor and Manor Park to the south. Lying to the west of the historic core and outside of the Conservation Area is Fartherwell, bounded by Norman Road and Offham Road, this mainly residential area dates from the inter war period and expanded in the 1950s and 60s.

7.22 The town lies about 1.5km to the south of the southern boundary of the Kent Downs National Landscape which runs along the M20 at this point. There is some intervisibility of the village with the elevated downs to the north and these long views are an important part of the character of the town.

7.23 Green Belt borders the settlement along its northern, western and most of the southern sides. This has largely acted as a constraint to more contemporary expansion of the town in these directions. Whilst land to the east of the settlement includes St Mary's Abbey and Monastery and its grounds (both Scheduled Monuments), Manor Park and the Hermitage and its parkland; all of which are part of the West Malling Conservation Area. West and south of the Conservation Area, up to the A228 two-lane dual carriageway, is countryside, including West Malling Railway Station and several farmsteads. Proposals for major residential development to the east of West Malling have been dismissed at appeal in recent years. Inspectors have considered that large scale development to the east of the town would adversely impact heritage assets of national importance, the character of the area and the distinct approach to and countryside setting of West Malling. Recent developments at Kings Hill have taken place to the south of the A228 and at St Leonards Street, just to the west of the A228, adjacent to Kings Hill.



Figure 9: Aerial image of West Malling (Google Earth)

7. Green Gap Assessment

East Malling & Mill Street

7.24 East Malling, and the adjoining Mill Street, lie to the east of the A228 and just to the south of Leybourne, Larkfield and Ditton that form part of the Medway Gap settlements. East Malling is within Tier 3 of the Borough's settlement hierarchy. The population estimate of the East Malling parish is some 5,000, noting that this includes part of Larkfield (within Medway Gap), which is now almost physically connected to East Malling.

7.25 East Malling is centred on its High Street and the crossroads of Mill Street and Church Walk. The village, comprising both East Malling and Mill Street, has expanded relatively little over the 20th and 21st Centuries with some infill and housing developments on its peripheries, but these remain relatively low-density and in-keeping, preserving the identity of a semi-rural village, with access to surrounding countryside. Some recent new developments to the north have largely eroded the fragile open break between it and Medway Gap to the north. However, the village's rural context to the west, south and especially the aspect to the east, preserve a sense of separation, openness and links with its agricultural origins.

7.26 Although East Malling was a successful agricultural settlement for centuries, industrial mills were formed at nearby Mill Street from the 17th Century. Corn milling, fulling and papermaking were the main industries. Many terraced houses were built in the 18th and 19th Centuries for agricultural and mill workers, transforming the rural hamlet into a working industrial village. Farm and mill owners built substantial properties on large plots set away from the terraced houses. The High Street was previously home to many commercial premises which have now been converted to residential use.

7.27 The high quality of the surrounding agricultural land has, for centuries, been used for horticulture and fruit growing. The East Malling Research Station lies to the east of the village. This is a world class centre of excellence for applied research and innovation in commercial horticulture.

7.28 The East Malling Village Conservation Area covers much of the village, encompassing areas close to the main junction formed by Mill Street, Church Walk, High Street and New Road. The designated area extends south past the dissecting railway line taking in Chapel Street and The Rocks Road towards the southeastern fringes of the village. There are several listed buildings within the Conservation Area.

7.29 The Mill Street Conservation Area includes the core part of Mill Street and the route of the Mill Stream and some buildings within Well Street within the countryside to the south. The Conservation Area includes two existing former mills, three oast houses and tightly packed houses along Mill Street itself.

7.30 The northern edge of the historic village is close to modern development which has expanded south from Medway Gap including a new residential development, 'The Sweetings', to the east of New Road. However, the set back of housing behind the mature tree lines flanking New Road and the recreation ground by East Malling Village Hall still provide a sense of separation between settlements. Together with the expansion of Medway Gap to the north, there are also various consents and current planning applications for sites around East Malling and Mill Street. These demonstrate considerable pressure for development.



Figure 10: Aerial image of East Malling & Mill Street (Google Earth)

7. Green Gap Assessment

Wouldham

7.31 Wouldham is a village on the eastern bank of the winding River Medway. It is a Tier 3 settlement in the Borough's hierarchy. Wouldham abuts the Kent Downs National Landscape to the north-east and the boundary of Tonbridge & Malling Borough to the north-west, at the river. The village has a population of approximately 1,500. The parish of Wouldham includes the new settlement of Peters Village, which is close to the south.

7.32 As with many of the villages of the Medway Valley, Wouldham has a history of cement quarrying. The cement industry of the Medway Valley started at Wouldham and was active here from the mid-1800s to the 1920s. The river at Wouldham was used to export the material by barge.

7.33 The High Street that runs from north to south through the village is narrow and enclosed by terraces of mid-Victorian workers' cottages. Leading off the High Street are short streets of late-20th Century housing estate development. Some good-quality examples of modern housing (designed in the traditional style) are to the eastern edge of the village.

7.34 As with the other older settlements to the east of the River Medway, the enhanced accessibility brought about by the new bridge for Peters Village, means that an increased level of development pressure is likely for these rural settlements. The National Landscape to the north and the river to the west limit the future development potential of Wouldham along these edges. However, as identified for Peters Village (see below), there is the potential for these nearby settlements to physically merge, although given the close proximity to the Kent Downs National Landscape boundary to the north and east, consideration of the effects on the setting of the National Landscape would be required and this may constrain development.



Figure 11: Aerial image of Wouldham (Google Earth)

7. Green Gap Assessment

Aylesford Village

7.35 Aylesford Village is categorised as a Tier 4 settlement in the Borough's hierarchy. It is small riverside village on the northern bank of the River Medway, with a population of about 1,000. The historic core of Aylesford, at the High Street, has strong connections with the river. The rear facades and gardens of properties lead to the riverbank, and a riverside path links to an informal park and an historic stone bridge (an Ancient Monument).

7.36 The tightly arranged buildings of the village centre along the High Street are generally of two or three storeys. The Church of St Peter and St Paul is located on high ground immediately to the north of the houses on the High Street.

7.37 The Aylesford Conservation Area covers the historic core, riverbanks and The Friars Aylesford Priory to the west of the village. The priory dates from the 13th Century.

7.38 The River Medway has been a key influence on Aylesford throughout its history. The historic stone bridge is understood to be one of the earliest bridges across the river – dating from the 14th Century.

7.39 Large, flooded former quarries lie to the north-west of the village. An extensive warehousing, distribution and light industrial complex lies close by at Forstal to the east.

7.40 Aylesford has its own distinct identity but the southern part of the village, to the south of the river, is connected to Medway Gap, beyond the M20.

7.41 Various existing consents for employment uses are in place for land between Aylesford and the existing warehousing at Forstal and for care and residential uses within and around the lakes and former quarries to the north.



Figure 12: Aerial image of Aylesford Village (Google Earth)



Figure 13: Aerial image of Eccles (Google Earth)

Eccles

7.42 Eccles is a Tier 4 settlement in the Borough's hierarchy. The village is formed of late-Victorian terraces of workers cottages and 20th Century housing. It has a population of over 1,500.

7.43 Eccles is located on the rising land along the eastern side of the Medway Valley, where the River Medway runs through the Kent Downs National Landscape, and the village lies just west of the designated landscape boundary which follows Rochester Road and the Pilgrim's Way. The village is predominantly a 20th Century settlement focussed on Bull Lane, which bisects it, and on a large village green/recreation ground at its centre. The village lies on gentle slopes in a rural landscape of relatively open, arable fields, which offer long views to the south-west, in particular, across the Medway Valley to the industrial areas around Aylesford, to the wooded Greensand Ridge beyond, as well as due west to the wooded Kent Downs on the opposite side of the valley. The village enjoys a relatively quiet, tranquil setting, set apart from the busy and widespread development of the valley floor.

7.44 The growth of the original settlement at Eccles is closely associated with the brick and cement industries of the Medway Valley of the 19th and 20th Centuries with many of the existing houses being former workers' cottages. Comparatively remote, in accessibility terms, until the recent developments at Peters Village to the north and the new road crossing of the river, the village has expanded relatively little in more recent times. However, the implementation of recent large planning consents to the west and south will significantly change the scale of the village.

7. Green Gap Assessment

Burham

7.45 Around 1km north of Eccles lies Burham, a village with a population of circa 1,100. This is a Tier 4 settlement in the Borough's hierarchy.

7.46 Burham has a largely linear form that follows Rochester Road. The road forms the boundary of the Kent Downs National Landscape, which lies on the rising ground to the north-east. Like Eccles, the village enjoys a rural setting and strong visual connection with the surrounding landscape, in particular across the valley to the Kent Downs to the west.

7.47 Also, as with Eccles, Burham has historic associations with the brick and cement industries. Within the village 19th Century workers' cottages form terraces along Rochester Road and Church Street. More modern 20th Century two-storey housing forms the rest of the village.

7.48 The presence of the National Landscape limits development potential to the east but improvements in accessibility with the new bridge over the river at Peters Village may increase development pressure, as it has at Eccles, at this rural settlement. Although given the close proximity to the Kent Downs National Landscape boundary to the east, any of expansion to the village beyond the remaining boundaries of the village would require an assessment of the effects on the setting of the National Landscape and this may constrain development.



Figure 14: Aerial image of Burham (Google Earth)



Figure 15: Aerial image of Peters Village (Google Earth)

Peters Village

7.49 Peters Village is a newly created residential community on the eastern bank of the River Medway. The new village comprises approximately 1,000 homes built in two parcels at a former cement quarry. Peters Village is a Tier 4 settlement in the Borough's hierarchy.

7.50 The quarried slopes and stepped woodlands form a dramatic backdrop to the village. The stepped woodland south of the village is a SSSI. The expansive park that separates the two development parcels emphasises the sense of being within a landscape. The river frontage offers impressive views over the River Medway valley towards the Kent Downs National Landscape. The designated landscape is separated here by the river valley. The Kent Downs are also immediately to the east of Peters Village.

7.51 The houses and community buildings within the new village are of two to four storeys and of a contemporary style – which borrows from the semi-rural vernacular of red brick and timber / weatherboard cladding found across the South-East.

7.52 The planned nature of the village has led to the existing streets being designed within the framework of the strong landscape features, including the river to the west and former quarried areas to the south and east. These natural features are likely to limit potential future expansion. There is some scope for expansion to the north where only a single, albeit large, field separates the new village from Wouldham but given the proximity to the boundary of the Kent Downs National Landscape to the east, such an expansion to the village would require an assessment of the effects on the setting of the National Landscape and this may constrain development.

7. Green Gap Assessment

7.53 The landscape sensitivity assessment of this study is based upon the Enplan-Binnies Landscape Sensitivity Assessment¹ work (LSA) that forms part of the Local Plan evidence base. The LSA has assessed land surrounding the Borough’s 27 most sustainable settlements and two key motorway junctions (M20 J4 and M26 J2a). The LSA has been informed by the findings of the Landscape Character Assessment² and has used these as the basis for the judgements in the LSA of landscape value and landscape susceptibility, which are then combined to define landscape sensitivity. The LSA defines various assessment areas around each of the settlements and motorway junctions, based on landscape units of similar character and/or that form logical visual units with definable boundaries, to which the process of assessing landscape value, landscape susceptibility and landscape sensitivity is then applied.

7.54 The sensitivity of the landscape to development between these settlements is important to this analysis. Where landscape is of high sensitivity to a particular form of development, it is more likely that the value and characteristics of that landscape will be less likely to accommodate change, and new development would be more likely to be inappropriate and can be resisted. Conversely, where the landscape is of lower sensitivity, the landscape will be more likely to be able to accommodate change where development may be more appropriate and less likely to be resisted. There may be other planning reasons, aside from landscape ones, as to why development should be resisted around settlements and that require lower sensitivity landscapes to be protected.

¹ Landscape Sensitivity Assessment for Tonbridge & Malling Borough Council, 2025, Enplan-Binnies
² Tonbridge & Malling Landscape Character Assessment, 2025, Enplan-Binnies

The areas between the settlements considered below is of lower or moderate levels of landscape sensitivity and in recent times, the values and characteristics of these landscapes have been unable, on their own, to resist development pressure.

7.55 This landscape sensitivity assessment reviews two main areas of countryside; that between Kings Hill and the Medway Gap settlements, including that around East Malling and east of West Malling, and that between Aylesford, in the south, and Wouldham, in the north, on the east side of the Medway Valley. Land constrained from development by the Green Belt and National Landscape designations has been excluded, as have some countryside areas which are particularly physically constrained from development, by an area of extensive flooded former mineral workings for example.

7.56 The three levels of development typology used in the assessment are as follows:

- **Small-scale residential development typology**
- Two/two and a half-storey residential dwellings – either terraced, semi-detached or detached – with associated access roads, private gardens and garaging, and with an assumed density of approximately 30-40 dwellings per hectare.
- **Medium-scale residential development typology**
- Two to three with some four-storey residential development – e.g. including blocks of flats, care homes or hotels with associated access roads, parking and communal open space and with an assumed density of approximately 40-50 dwellings per hectare
- **Large-scale residential development typology**
– Large-scale residential development and high densities (+50dph average), e.g. including multiple 5 storey plus blocks

Landscape Sensitivity Area	Small-scale residential development typology	Medium-scale residential development typology	Large-scale residential development typology
KMW01	Medium-Low	Medium	High-Medium
KMW02	Medium-Low	High-Medium	High-Medium
KMW10	Low	Low	Medium-Low
MGS02	High-Medium	High-Medium	High
MGS03	Medium	Medium	High-Medium
MGS04	Medium-Low	Medium	High-Medium
MGS05	Medium-Low	Medium-Low	Medium
MGS06	Medium-Low	Medium-Low	Medium-Low

Table 1: Landscape Sensitivity Assessment for LSAs between Kings Hill and the Medway Gap settlements

7. Green Gap Assessment

7.57 The countryside between Kings Hill and Medway Gap includes landscapes adjoining West Malling, around East Malling to its west, south and east, and up to the Borough's eastern boundary at Barming at the north-west edge of Maidstone. The landscape sensitivity of the relevant LSAs to the various residential development typologies used in the Landscape Sensitivity Assessment are shown in Table 1 above, Figures 16 and 17 indicate the sensitivity assessments for the small-scale residential development typology.

7.58 The LSAs to the immediate north, east and west of Kings Hill (KMW01, KMW02 and KMW10) are of lower levels of landscape sensitivity. This indicates that the nature and characteristics of these landscapes are of Medium value and may accommodate the adverse landscape changes brought about by the small-scale residential development type assessed without undue harm to those values and characteristics. In landscape terms, this means these areas are more vulnerable to development pressure than higher sensitivity landscapes.

7.59 Just to the north of Kings Hill but beyond the A228 across to West Malling (MGS02), the LSA is of High-Medium landscape sensitivity. This means that this LSA is generally not able to accommodate landscape change without undue harm to landscape value and characteristics and, consequently, this may significantly affect the setting of the settlement and its identity.

7.60 The LSA to the west and south of East Malling (MGS03) is of Medium sensitivity and the LSAs to the east, up to the Borough boundary with Maidstone, are of Medium-Low sensitivity (MGS04, MGS05 and MGS06). This indicates that the nature and characteristics of these landscapes are of Medium value and may accommodate

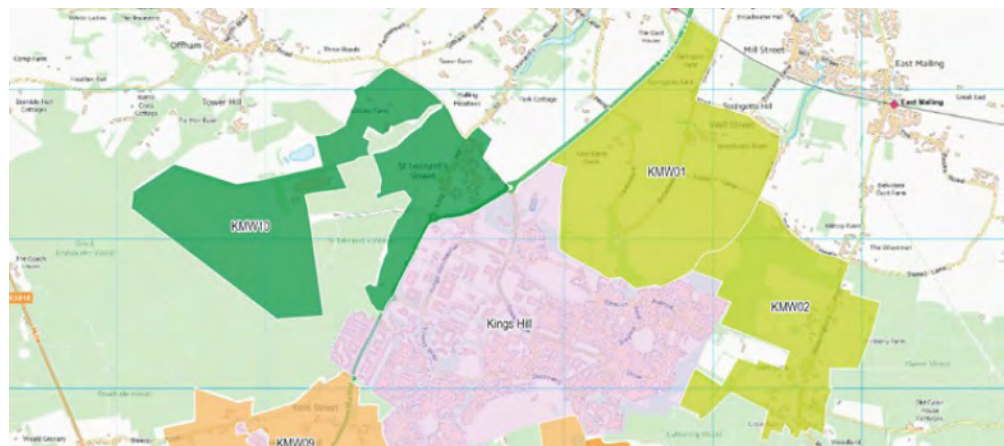


Figure 16: Landscape sensitivity analysis for the small-scale residential development typology (i.e. up to 2-2.5 storey housing at 30-40 dwellings per hectare) to the north of Kings Hill

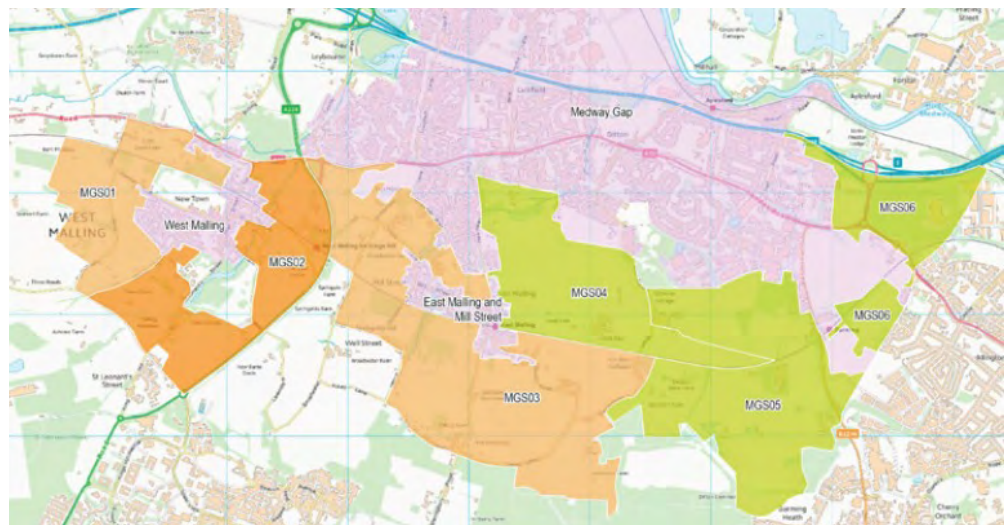


Figure 17: Landscape sensitivity analysis to the small-scale residential development typology (i.e. up to 2-2.5 storey housing at 30-40 dwellings per hectare) to the south of the Medway Gap settlements

7. Green Gap Assessment

the adverse landscape changes brought about by the small-scale residential development type assessed without undue harm to those values and characteristics. In landscape terms, this means these areas are more vulnerable to development pressure than higher sensitivity landscapes.

7.61 The landscape immediately surrounding East Malling is more sensitive to change than the LSAs to its east which adjoin Medway Gap and Maidstone. There are three Conservation Areas relating to East Malling, including the Mill Street Conservation Area that extends into the landscape at Well Street. The visual openness of the landscape to the south-east of the village is more susceptible to change than landscape areas to the east. The landscape character of these areas to the east is less visually open and more related to existing urban developments.

7.62 Overall, with the exception of the LSA north and west of the A228 (east of West Malling – MGS02), the landscape around the northern part of Kings Hill is of a lower level of landscape sensitivity. It is highly vulnerable to development pressure, as are the landscapes to the south and south-east of the Medway Gap settlements. The High-Medium and Medium sensitivity landscapes east of West Malling and around East Malling are also vulnerable to development pressures and where, if development were to come forward, there may be significant effects on the setting of these villages and their identity.

7.63 The countryside on the east side of the Medway Valley between Aylesford, in the south, and Wouldham, in the north, outside of the National Landscape to the east, includes part of the floodplain of the River Medway around Aylesford and northwards beside the river, and the

gently inclined foothills, below the steeper scarp of the National Landscape, between Eccles and Wouldham. The landscape sensitivity of the relevant Landscape Sensitivity Areas (LSAs) to the various residential development typologies used in the Landscape Sensitivity Assessment are shown in Table 2 below. Figures 18-20 on the next page indicate the sensitivity assessments for the small-scale residential development typology.

7.64 The LSAs to the west of Aylesford (MGN03), west of Eccles (ECC01) and west of Burham (WPB05) are of lower levels of landscape sensitivity. This indicates that the nature and characteristics of these landscapes are of Medium value and may accommodate the adverse landscape changes brought about by the small-scale residential development type assessed without undue harm to those values and characteristics. In landscape terms, this means these areas are more vulnerable to development pressure than higher sensitivity landscapes. The recent large planning consent for development to the west and south of Eccles, when implemented, will encompass all of LSA ECC01 and may increase

development pressure on other areas adjoining the consented land and/or elsewhere around Eccles.

7.65 The LSAs to the east of Eccles (ECC02) and around Wouldham (WPB01 and WPB02) are of higher levels of sensitivity, with that part of LSA WPB01 to the west of Wouldham that lies just outside of the National Landscape and LSA ECC02 to the east of Eccles being of High-Medium sensitivity. These High-Medium assessments reflect these landscape’s relatively High value and means that these LSAs are generally not accommodating of landscape change without undue harm to landscape value and characteristics and, consequently, developments coming forward in these LSAs may significantly affect the setting of the settlement and its identity.

7.66 Overall, the landscape west of Eccles and south of Burham is vulnerable to development pressure. The higher sensitivity landscapes, east of Eccles and around Wouldham, include High value landscapes but are also visually open with stronger relationships to the National Landscape to the immediate east than the more visually

Landscape Sensitivity Area	Small-scale residential development typology	Medium-scale residential development typology	Large-scale residential development typology
MGN03	Low	Medium-Low	Medium-Low
ECC01	Medium-Low	Medium	High-Medium
ECC02	High-Medium	High-Medium	High
WPB01	High-Medium	High-Medium	High
WPB02	Medium	Medium	High-Medium
WPB03	Medium-Low	Medium	High-Medium
WPB05	Medium-Low	Medium-Low	Medium

Table 2: Landscape sensitivity assessment for LSAs between Aylesford and Wouldham

7. Green Gap Assessment

enclosed landscapes west of Burham. Although this factor is embedded in the landscape sensitivity assessments, it is worth highlighting that the foothill landscape, beyond the boundary of the National Landscape, is part of the setting of the National Landscape, parts of which are in the foreground of that setting as well. The setting enjoys a degree of protection through national planning policy, including the NPPF³, the Planning Practice Guidance⁴, the 'Protected Landscapes Duty' guidance⁵ and the Management Plan for the Kent Downs.

3 Paragraph 189

4 Paragraph: 042 Reference ID: 8-042-20190721

5 Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes, 2024, DEFRA

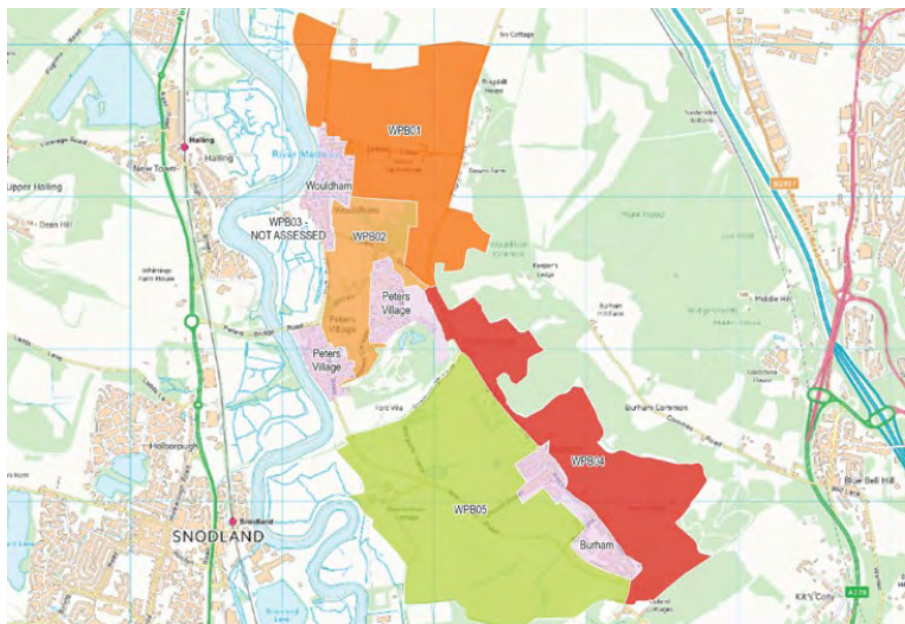


Figure 20: Landscape sensitivity analysis to the small-scale residential development typology (i.e. up to 2-2.5 storey housing at 30-40 dwellings per hectare) from Burham north to Woudham

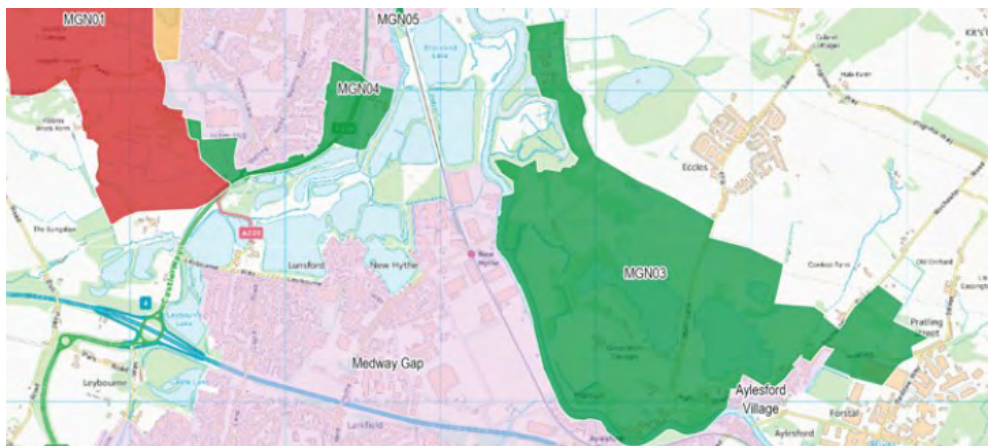


Figure 18: Landscape sensitivity analysis to the small-scale residential development typology (i.e. up to 2-2.5 storey housing at 30-40 dwellings per hectare) to the west of Aylesford

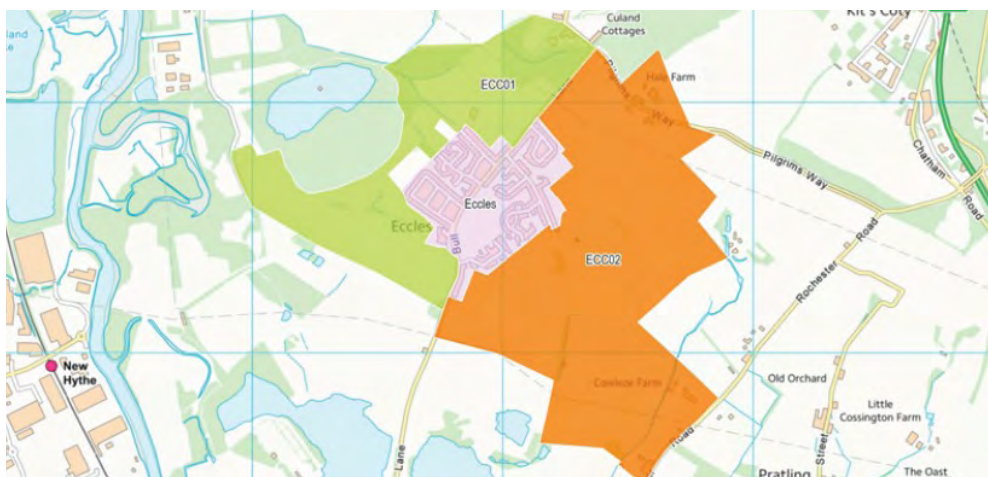


Figure 19: Landscape sensitivity analysis to the small-scale residential development typology (i.e. up to 2-2.5 storey housing at 30-40 dwellings per hectare) around Eccles

7. Green Gap Assessment

Stage 4: Review and Recommendations

Kings Hill and Medway Gap

7.67 Kings Hill and Medway Gap are Tier 2 and Tier 1 settlements respectively. They provide for a range of significant employment, retail, services, education, leisure and community uses, as well as access to the M20 for commuting. The assessment highlights that there is significant and probably inevitable development pressure at their settlement edges and there is a raft of recent planning consents currently being implemented, with applications awaiting decisions. Additionally, sites throughout this part of the Borough are being promoted by developers for inclusion in the emerging Local Plan as part of the Call for Sites process.

7.68 The Green Belt to the west and south of Kings Hill and the physical landscape constraints to the north of Medway Gap mean that the development pressure can only be focussed on the southern side of Medway Gap, specifically Leybourne and Ditton, and on the north side of Kings Hill. There is also considerable development pressure on the edges of East Malling and Mill Street, especially where sites at these edges have some visual enclosure. There is also an absence in this area of other development constraints, such as flooding, wildlife sites and so on. Pressure at West Malling is more readily resisted, by the Green Belt immediately to the west and by 'high-level' heritage constraints beside the town to the east. However, beyond these constraints, the wider countryside to the north, east and south, that provides the rural setting for the town, remains vulnerable.

7.69 Through the emerging Local Plan there is likely to be the need to plan strategically for the further expansion of Kings Hill and Medway Gap through the plan period where conditions allow. In addition to this, there is a

strong case for a Green Gap policy to help to ensure that the setting, character and identities of East Malling, Mill Street and West Malling are conserved. These historic settlements are valuable individually in heritage terms, and collectively to the Borough as a whole, as evidenced by the Ancient Monuments, multiple Listed Buildings and the designation of various Conservation Areas within and around them¹. Also, the countryside around them is readily accessible from the settlements via multiple Public Rights of Way and these provide informal leisure opportunities for the large population the adjoins it. Currently the settings, character and identities of East Malling, Mill Street and West Malling are threatened by the expansion of their larger neighbouring settlements, and a form of Green Gap policy is justified to manage future unplanned growth.

7.70 The prospective boundaries of the Kings Hill – Medway Gap Green Gap, in outline, would follow the northern edge of Kings Hill and southern edge of the Medway Gap settlements respectively, allowing for implemented and live consents, and for allocations that may emerge through the Local Plan process (refer to Figure 21 below).

7.71 The boundary would follow the built-up areas of East Malling, Mill Street and the eastern side of West Malling, again allowing for any Local Plan allocations and related settlement boundary changes. The recreation ground, grounds of The Malling School and grounds around Clare House Park, all to the north of East Malling/Mill Street would be included to conserve the gap between East Malling/Mill Street and the southern 'limb' of Leybourne to the north. The hamlets of Well Street and Four Acres at The Rocks Road, and the East Malling

Research Centre would lie within the Green Gap. The southern boundary of the gap to the east of Kings Hill would follow The Heath, Sweets Lane and Easterfields. The eastern boundary would be close to the buildings of the East Malling Research Centre, excluding undeveloped land and an allocation to the east of the Centre, before looping round the southern edge of Medway Gap. To the east of West Malling, between the settlement boundary and the A228, the Green Gap would include Manor Park Country Park and the parkland of St Mary's Abbey, as well as the countryside between these and the A228.

¹ Refer to the Tonbridge & Malling Heritage Strategy

7. Green Gap Assessment

Kings Hill and Medway Gap

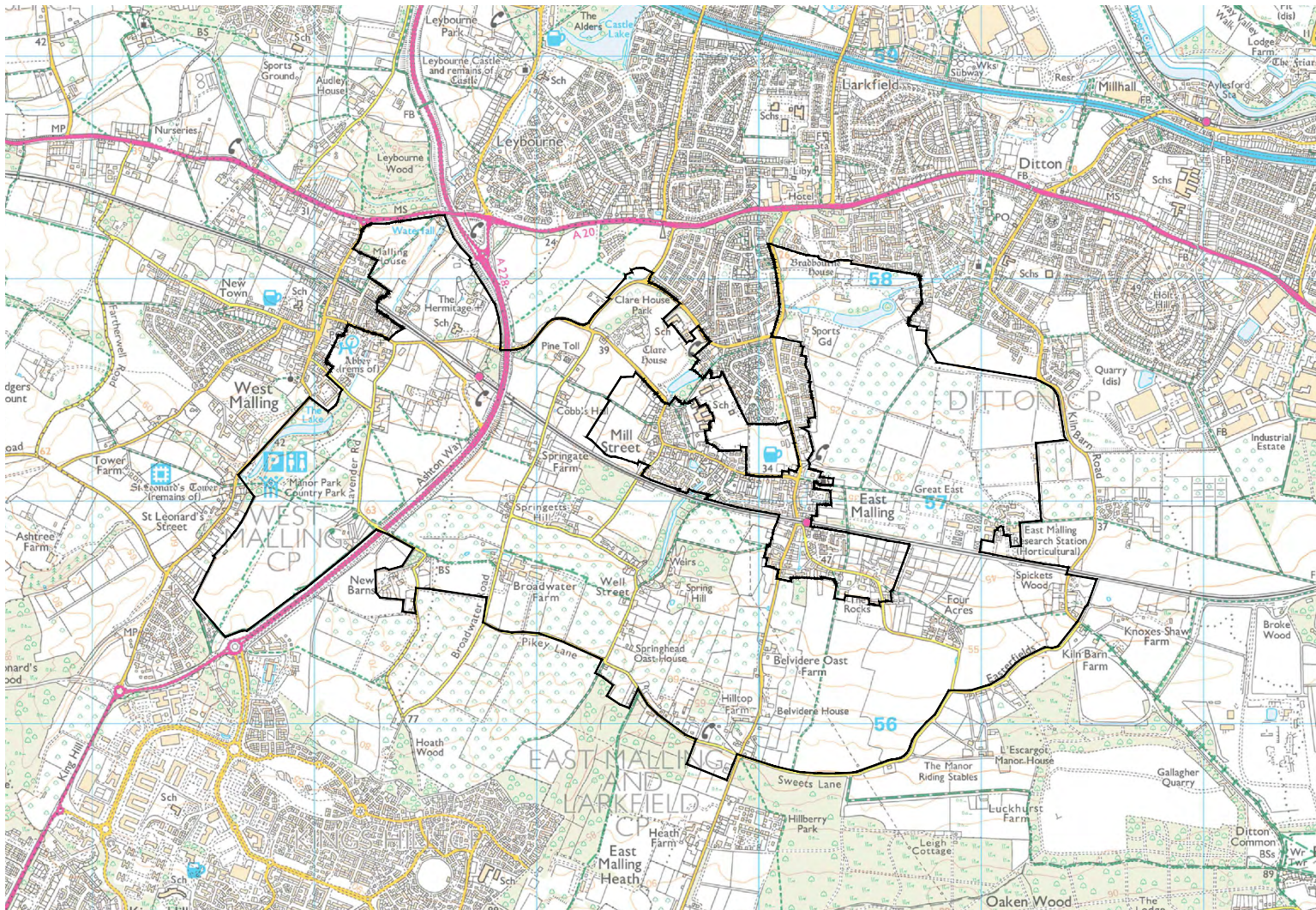


Figure 21: Preliminary proposed boundaries for a Kings Hill – Medway Gap Green Gap

7. Green Gap Assessment

Aylesford to Wouldham

7.72 The area on the east side of the River Medway in the Medway Valley includes three villages, Eccles, Burham and Wouldham, with their origins and histories largely associated with the brick and cement industries of the 18th and 19th Centuries. From the 20th Century the cement industry focussed its interests on the west side, which was accessible to the railway. The east side remained relatively remote in accessibility terms until the recent development of the new Peters Village community, on the former Peters Pit land, and crucially the construction of the road bridge to serve it. The new road bridge has significantly increased the accessibility of the eastern side of the Medway Valley. The large-scale consent recently granted on the land to the west and south of Eccles will evolve the character of the village but the level of employment opportunities, educational and community services on the east side remain comparatively low which may deflect development pressure to areas better served elsewhere for some time to come.

7.73 The character of Eccles, Burham and Wouldham, whilst different to each other in respect of their form and location in the landscape, share some common characteristics. Much of the housing is 18th and 19th Century workers' cottages, with some small-scale 20th Century infill and expansions. Whilst Wouldham has a historic core associated with its riverside past, there are no Conservation Areas within these villages.

7.74 Aylesford, on the River Medway to the south of this area, is perhaps a separate case to the east side villages. It has evident heritage value and has a Conservation Area, many Listed Buildings and a Scheduled Monument. It is partly physically separated from the rest of the east side

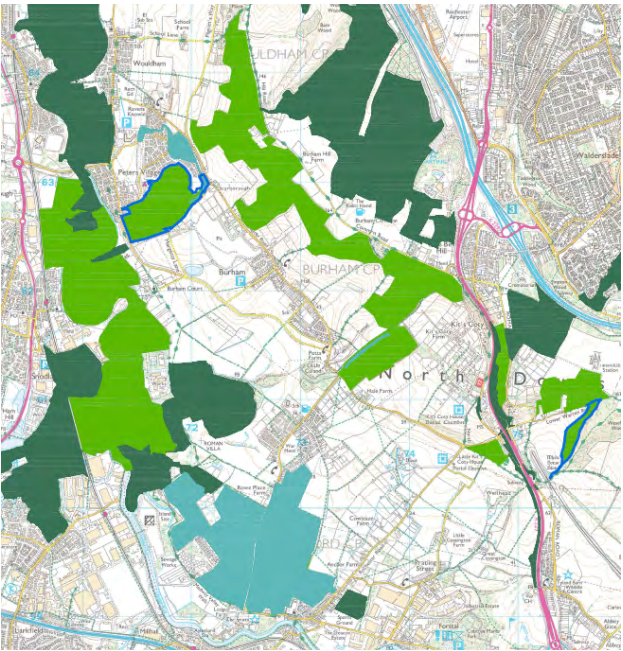
of the river, to the north, by former and flooded mineral workings and its former relationship with the landscape of the east side of the valley and the Kent Downs National Landscape to the north is somewhat diminished by these elements.

7.75 Overall, the east side of the Medway Valley differs from the Kings Hill and Medway Gap in several key respects; it is more accessible than at any previous time, it remains comparatively distant from motorways and railway stations and, although not without some value, the settlements do not have the recognised heritage value associated with the historic settlements of East Malling, Mill Street and West Malling; Aylesford being the exception. In respect of landscape sensitivity, the landscape east of the River Medway is more sensitive overall than the Kings Hill and Medway Gap. Some of it is within the Kent Downs National Landscape and much of it is likely to be within the setting of the National Landscape. There is also the widespread presence of Special Area of Conservation, Sites of Special Scientific Interest, Local Wildlife Sites and Regionally Important Geological Sites designations that also provide a significant constraint to development across some areas (refer to Figure 22); no such designations exist in the Kings Hill-Medway Gap Green Gap. In combination, these circumstances and designations mean that the need for specific development constraint policies, such as a Green Gap, is less essential than between Kings Hill and Medway Gap, although it should be recognised that development pressures will continue presenting some threat to the landscape settings, character and identity of these settlements.

7.76 Through the emerging Local Plan there may be the need to plan strategically for the further expansion of some of the settlements commensurate with their

scale and level of services. A number of sites are being promoted including one at Wouldham and several at Eccles, with the largest promotions being on the land between Eccles and Aylesford. The LSA work and Landscape and Visual Appraisal evidence base¹ should help to ensure that development allocations that emerge through the process are sensitively sited, with appropriate strategic mitigation, to protect the setting, character and identity of these settlements.

1 Landscape and Visual Appraisal for Tonbridge & Malling Borough Council, 2025, Enplan-Binnies



— Special area of Conservation
 ■ Sites of Special Scientific Interest (SSSI)
 ■ Local Wildlife Sites (LWS)
 ■ Regionally Important Geological Sites (RIGS)

Figure 22: Ecological designations around Aylesford and Wouldham

7. Green Gap Assessment

7.77 It is concluded that there is a strong case for a Green Gap policy to help to ensure that the setting, character and identities of East Malling, Mill Street and West Malling are conserved, and it is recommended that a Green Gap policy is adopted for an area of countryside between Kings Hill and Medway Gap and up to the boundaries of Malling and East Malling and Mill Street. For the settlements on the east side of the Medway Valley, there are different circumstances and more designations in the surrounding area that together mean the need for a specific development constraint policy, such as a Green Gap, to protect their separate identity and prevent coalescence, is not essential.

8. Assessment against the Green Gap purposes

8.1 The purpose of this part of the assessment is to analyse the recommended Kings Hill–Medway Gap Green gap against criteria used to define the purposes of Green Gap. The following criteria have been used to assess whether the area of the recommended Green Gap meets the purposes of Stage 1: Define the Purposes of the Green Gap.

The criteria below have been derived from the review of relevant local plan policies, as set out at chapter 4.

8.2 The criteria used are as follows:

Key Purpose 1: *To maintain the landscape between neighbouring settlements as open to prevent merging / coalescence and the process of merging, to protect the setting, separate identity and character of these settlements.*

- Is the land predominantly open?
- Does the land form a gap between neighbouring settlements?
- What is the physical gap between settlements?
- Is there a perceptual gap between settlements?

Key Purpose 2: *To support the appreciation and wider perceptual benefits of open countryside close to settlements.*

- Does the area provide access to the countryside from the settlement edge?
- Does the area provide recreational uses (formal and informal)?
- Does the area provide any key views / visual breaks?

Key Purpose 3: *To maintain the existing or influence the future form and boundaries of settlements.*

- Does the area have defensible and readily recognisable boundary features?
- Do these boundaries restrict the form of future surrounding development?
- Does the area include more land than is necessary to protect the separate identity of the settlements?
- Is the extent of the designation compatible with the strategic allocations set out in the Borough's spatial strategy?

8. Assessment against the Green Gap purposes

Key Purpose 1

8.3 Key Purpose 1 addresses the functional aspects of the land that would be included within the Green Gap and the land between the settlements.

8.4 The land within the Green Gap is predominantly open, which is one of the essential requirements for a gap between settlements. It includes scattered settlement, as does much of the Borough's countryside, and some other built elements that may complement the Green Gap, such as St Mary's Abbey at West Malling. It also includes several areas of existing development that require a level of planning restriction, such as that provided by a Green Gap policy, to prevent possible outward expansion that may undermine the purposes of a Green Gap, for example the Four Acres development at The Rocks Road.

8.5 The land within the Green Gap, to a very large extent, provides a clear physical and perceptual gap between the settlements. Only between Mill Street and the southern edge of part of the settlement boundary of Medway Gap would the gap be relatively narrow (some 100m to 400m). Here it is also partly occupied by built uses, such as schools. This built form would diminish the gap's effectiveness, in a perceptual sense, although the open areas, such as the school playing fields and recreation ground at East Malling, ensure the effectiveness of a Green Gap overall. Moreover, then remaining open areas represent the 'last field' before actual coalescence would occur and are, therefore, critical to the protection of the separate identity of the settlements, especially Mill Street in this case.

8. Assessment against the Green Gap purposes

Key Purpose 1

Key Purpose 1: <i>To maintain the landscape between neighbouring settlements as open to prevent merging / coalescence and the process of merging, to protect the setting, separate identity and character of these settlements.</i>	
Is the land predominantly open?	The land is predominantly open. Built form includes scattered and very low-density residential development and occasional farmsteads, typical of the Borough's countryside, plus some more significant built elements. These are, from west to east; St Mary's Abbey, The Hermitage, West Malling Railway Station, Clare House Park, the hamlet of Well Street, various schools around East Malling, Bradbourne House, the Four Acres settlement at The Rocks Road and the East Malling Research Station. The area is also crossed by the A228 Ashton Way dual carriageway
Does the land form a gap between neighbouring settlements?	The land forms two distinct gaps between East Malling/Mill Street and Medway Gap to the east and west of New Road respectively, and gaps between West Malling and Medway Gap, between West Malling and Mill Street, and between West Malling and the north-west end of Kings Hill. Part of the recommended southern boundary follows the built edge of a potential allocation at Broadwater Farm. Only to the south-east does the land not form a gap between neighbouring settlements, but it is proposed to include this land for other purposes (see below).
What is the physical gap between settlements?	Mill Street and Medway Gap = varies 100-400m East Malling and Medway Gap = varies 600m-1km West Malling and Medway Gap = 400m West Malling and Mill Street = 1km West Malling and Kings Hill = 700m East Malling/Mill Street and Broadwater Farm boundary = 800m
Is there a perceptual gap between settlements?	The existing gap between Mill Street and Medway Gap is narrow and, in part, is occupied by some built uses, e.g. The Malling School. The open parts of the gap include a recreation ground, playing fields and some woodland. There remains a perceptual gap, albeit that it is of modest scale. The gap between East Malling and Medway Gap is much broader and largely open in character. Whilst the two settlements have effectively conjoined along the east side of New Road immediately to the north of East Malling, the gap to the north-east of this is, however, a clearly perceived gap. The other gaps between settlements all comprise predominantly open land and are of a reasonable width to ensure that these are perceived as gaps between settlements.

Table 3: Summary Table for Key Purpose 1

8. Assessment against the Green Gap purposes

Key Purpose 2

8.6 Key Purpose 2 seeks to explore how the countryside within the gap would be used and appreciated by people who live in the settlements.

8.7 The area within the recommended Green Gap provides multiple opportunities to access the countryside within the gap and the countryside beyond the gap, especially to the woodlands to the south-east. The Public Rights of Way network within the gap is readily accessed from the settlements and this, together with several minor country lanes, provide for routes of a relatively high level of amenity and with some fine views. In addition to these routes there is Manor Park Country Park at West Malling and the recreation ground at East Malling for informal recreation.

8.8 The rolling topography, together with the open character of some of the area, provides for a number of attractive key views that allow for an appreciation of the breaks between settlements and the countryside setting of the settlements. These include some views from the edges of settlements to other settlements and other views that provide an appreciation of the countryside setting and character of the visual break between settlements generally. Figure 23 identifies the location of the longer of these views and Figures 24-27 illustrate the nature of some of these longer views.

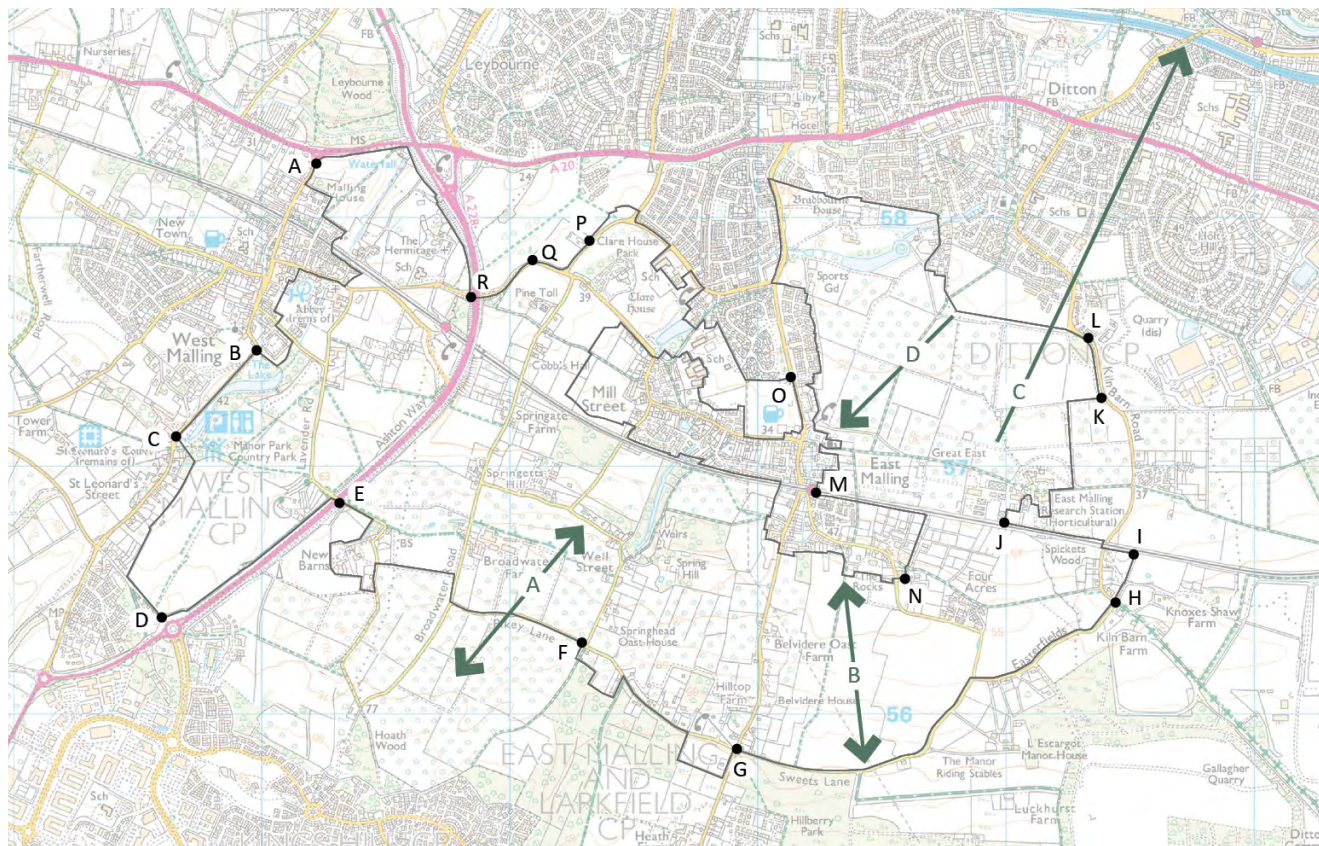


Figure 23: Proposed Green Gap boundaries and Key Views

8. Assessment against the Green Gap purposes



Figure 24: View (A) from Pikey Lane, north to Well Street



Figure 25: View (B) from Sweets Lane, north to East Malling



Figure 26: View (C) from ridgeline footpath at Four Acres, north to the chalk escarpment



Figure 27: View (D) towards St James' Church, East Malling

8. Assessment against the Green Gap purposes

Key Purpose 2: <i>To support the appreciation and wider perceptual benefits of open countryside close to settlements.</i>	
Does the area provide access to the countryside from the settlement edge?	The area provides multiple access points from all settlements to countryside both within the Green Gap and to countryside outside the gap. The access opportunities include Public Rights of Way and some country lanes. Users of a number of these have the opportunity to enjoy a high level of amenity with scenically attractive surrounds, some fine views and a sense of tranquillity away from the roads and settlement edges. These include views from the south-east of East Malling to the south-east and those back from the south-east to East Malling (Figure 24), the ridgeline footpath between The Rocks Road and Kiln Barn Lane (Figure 25), footpaths across the fruit fields of the East Malling Research Station (Figure 26), footpaths and country lanes around Well Street (Figure 24), and footpaths across the land east of West Malling.
Does the area provide recreational uses (formal and informal)?	The Green Gap provides informal recreational uses via the Public Right of Way network together with Manor Park Country Park at West Malling. Formal recreational uses include the multiple sports fields associated with the schools and the recreation ground at East Malling.
Does the area provide any key views / visual breaks?	The gently rolling topography and openness of much of the area within the gap provides for some attractive key views and an appreciation of the breaks between settlements and the countryside setting of the settlements. The key views include (refer to Figure 22): The views from Well Street, south across the orchards of Broadwater Farm in the direction of Kings Hill (currently largely screened) and views back from the south-west towards Well Street (View A Figure 23). The open views from the south-east edge of East Malling, south to the wooded horizon of Oaken Wood and Barming Wood and the return views to East Malling from Sweets Lane (View B Figure 24). The expansive views from the ridgeline public footpath near Four Acres, south over the fruit fields of the East Malling Research Station to the chalk escarpment of the Kent Downs National Landscape (View C Figure 25). The views to St James' Church, East Malling, from the north and east from the public footpaths across the fruit fields of the East Malling Research Station (View D Figure 26).

Table 4: Summary Table for Key Purpose 2

8. Assessment against the Green Gap purposes

Key Purpose 3

8.9 Key Purpose 3 focusses on the likely effectiveness of the boundaries of the Green Gap, the extent to which it allows for future expansion, including the spatial strategy for future development in the Local Plan, and whether the boundaries define the land required to protect the separate identity of the settlements is the minimum necessary.

8.10 The recommended Green Gap boundary follows clearly recognisable and robust features on the ground throughout. The boundary has been drawn to accommodate proposed site allocations at Kings Hill (Broadwater Farm), Medway Gap (at Lucks Hill), by The Rocks Road immediately east of East Malling, and the proposed allocation at East Malling Research Station. Other than these site allocations, the boundaries of the Green Gap are deliberately drawn in order to preserve the open character of the gap through the life of the new Local Plan.

8.11 Overall, it is considered that the proposed boundaries of the Green Gap and the land proposed to be included within it meet the criteria used to define the purposes of Green Gap. The boundaries are clearly defined, follow physical features on the ground and allow for appropriate site allocations through the Local Plan. The land within the Green Gap is predominantly open, accessible countryside and visually perceived as a gap between settlements, and the land within the gap is the minimum necessary to protect the separate identity of those settlements.

8. Assessment against the Green Gap purposes

Key Purpose 3: <i>To maintain the existing or influence the future form and boundaries of settlements.</i>	
Does the area have defensible and readily recognisable boundary features?	The boundary is defined by clearly recognisable and robust physical features on the ground throughout. The boundary features by section are as follows (refer to Figure 22): A-B = the settlement boundary of West Malling B-C = St Leonards Street C-D = property boundaries along St Leonards Street and Windmill Lane West D-E = A228 E-F = the built edge for the proposed Broadwater Farm site allocation F-G = combination of The Heath and woodland edge to the south of The Heath G-H = Sweets Lane and Easterfields H-I = property boundaries I-J = railway line J-K = the edge of the proposed East Malling Research Station employment uses allocation K-L = part of Kiln Barn Road L-M = the settlement boundaries of Medway Gap and part of East Malling M-N = the edge of a proposed residential allocation at East Malling N-O = the settlement boundaries of East Malling and Mill Street O-P = part of the settlement boundary of Medway Gap P-Q = parts of Winterfield Lane and Lucks Hill, as well as a proposed residential allocation Q-R = Lucks Hill and part of the settlement boundary of Medway Gap R-A = A228 and A20
Do these boundaries restrict the form of future surrounding development?	The boundaries allow for proposed site allocations in the new Local Plan but otherwise seek to restrict the form of future surrounding development through the life of the new Local Plan.
Does the area include more land than is necessary to protect the separate identity of the settlements?	The area only includes land necessary to prevent the coalescence of the settlements and to protect their separate identity, except in one area. The land in the south-east of the recommended Green Gap, between the south-east edge of East Malling and the boundary along Sweets Lane and Easterfields (points G-J on Figure 23) is included within the Green Gap because it protects the visually open, rural setting of East Malling to the south-east, as well as preserving several key views within the gap that help to define that setting. It also ensures the continuity of the land within the gap around East Malling which is a more robust position from which to protect the identity of this settlement.
Is the extent of the designation compatible with the strategic allocations set out in the Borough's spatial strategy?	The boundaries allow for proposed site allocations in the new Local Plan around Medway Gap, Kings Hill, East Malling and to the East Malling Research Station.

Table 5: Summary Table for Key Purpose 3

9. Summary and Conclusions

9.1 The purpose of this Green Gap Study (GGS) is to ascertain whether the designation of Green Gaps, and an associated policy to control development within them, could be justified. The designation of Green Gaps, and policies to protect them, can help to avoid coalescence of settlements and preserve their separate identities and characters by maintaining open landscapes between them.

9.2 Other than Green Belt, the National Planning Policy Framework (NPPF) includes no specific requirement to seek to prevent the coalescence of settlements to maintain their separate identities. There is support in the NPPF for maintaining the identifiable characteristics of places, albeit that this is with regard to new development and the achieving of well-designed places. For example, paragraph 135 requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting; and to “establish or maintain a strong sense of place.....to create attractive, welcoming and distinctive place to live, work and visit”. It would be reasonable to interpret that this emphasis allows for policies to protect what constitutes a distinctive place, including the relationship between built and landscape features.

9.3 Green Gaps, or similar policies, have been included in recently adopted local plans by Adur District Council, Worthing Borough Council and Arun District Council. The relevant development plan policies were adopted between 2017 – 2023 and, therefore, post the NPPF. These authority areas include the extensive urban development along the coastal strip between Shoreham-by-Sea and Littlehampton. Undeveloped areas that remain, in between individual settlements, are protected by Green Gap or similar policies. Tendring District Council is a further

example and shares some similar spatial characteristics with Tonbridge & Malling. Tendring adopted a Strategic Green Gaps policy in January 2022.

9.4 The local plans of the local planning authorities contiguous with Tonbridge & Malling Borough have been reviewed for Green Gap, or similar policies. These authorities share some broad characteristics with the Borough. They all have large urban and large countryside areas covered, to greater or lesser degree by ‘higher-level’ designations, i.e. National Landscapes and Green Belt. However, some countryside areas of the Borough, that are not covered by the higher-level designations lie between settlements that are physically close and where, typically, development pressure is at its greatest. These circumstances of the close physical proximity of settlements and significant development pressure at these settlements are not unique to the Borough, but they are arguably more pronounced here than in any of the other contiguous authorities.

9.5 This GGS explores if and where Green Gaps may be justified within the Borough using a four-stage approach. These stages define the purposes of a Green Gap, provide a high-level assessment of settlements outside of National Landscapes and Green Belt, consider the landscape sensitivity assessment of areas between settlements and, lastly, review and make recommendations.

9.6 The focus of the need for Green Gaps is on those settlements outside of the Green Belt and National Landscapes. A high-level assessment analyses the character of these settlements to ascertain whether these settlements have distinct and separate identities that could justify the need for protection from coalescence. These settlements include Kings Hill and Medway Gap, and

those settlement between these, and the settlements on the east side of the Medway Valley between Wouldham and Aylesford.

9.7 This GGS considers that, in principle, a Green Gap policy is justified and shown to comply with the NPPF. Through the emerging Local Plan there is the need to plan strategically for the further expansion of Kings Hill and Medway Gap through the plan period where conditions allow. In addition to this, there is a strong case for a Green Gap policy to help to ensure that the setting, character and identities of East Malling, Mill Street and West Malling are conserved. These historic settlements are valuable individually in heritage terms, and collectively to the Borough as a whole. Currently their settings, character and identities are threatened by the expansion of their larger neighbouring settlements, Kings Hill and Medway Gap. Moreover, the landscape sensitivity of the countryside between these settlements is relatively moderate or low. Where the landscape is of lower sensitivity, it will be more likely to be able to accommodate change where development may be more appropriate and, therefore, less likely to be resisted. This means that these landscapes are particularly vulnerable.

9.8 The east side of the Medway Valley differs from the Kings Hill and Medway Gap in several key respects; although it is more accessible than at any previous time, it remains comparatively distant from motorways and railway stations. Also, although not without some value, the settlements do not have the recognised heritage value associated with the historic settlements of East Malling, Mill Street and West Malling; Aylesford being the exception. In respect of landscape sensitivity, the landscape east of the River Medway is slightly more sensitive overall than the Kings Hill and Medway Gap. Some of it is within

9. Summary and Conclusions

the Kent Downs National Landscape and much of it is likely to be within the setting of the National Landscape. There is also the widespread presence of Special Area of Conservation, Sites of Special Scientific Interest, Local Wildlife Sites and Regionally Important Geological Site designations that also provide a significant constraint to development across some areas. In combination, these circumstances and the designations mean that the need for specific development constraint policies, such as a Green Gap, is less essential than between Kings Hill and Medway Gap, although it should be recognised that development pressures will continue presenting some threat to the landscape settings, character and identity of these settlements.

9.9 It is recommended that a Green Gap policy is adopted for an area of countryside between Kings Hill and Medway Gap and up to the smaller settlements of West Malling and East Malling and Mill Street. Overall, it is considered that the proposed boundaries of the recommended Green Gap, and the land proposed to be included within it, meet the criteria used to define the purposes of Green Gap. The boundaries are clearly defined, follow physical features on the ground and allow for appropriate site allocations through the Local Plan. The land within the Green Gap is predominantly open, accessible countryside and visually perceived as a gap between settlements, and the land within the gap is the minimum necessary to protect the separate identity of those settlements.

