
Spatial Strategy Topic Paper

November 2025

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This report has been prepared by officers within the Council to support the Regulation 18 Local Plan consultation.

1. Introduction

- 1.1. Tonbridge and Malling Borough Council ('the Council') is in the process of preparing a new Local Plan which will set out how the borough will grow and evolve over the next 15 years. The Plan includes a vision, strategic objectives and planning policies and development allocations that together provide the overarching framework for the delivery of sustainable development. The new Local Plan aims to allocate sufficient land in sustainable locations to ensure that the Council meets its housing and employment needs over the plan period 2024 to 2042.
- 1.2. Once adopted, the new Local Plan will replace the current Local Development Framework which comprises the adopted Core Strategy (September 2007), Development Land Allocations Development Plan Document (DPD) (2008), Tonbridge Central Area Action Plan (2008), Managing Development and the Environment DPD (2010) and Saved Policies (1998).
- 1.3. The purpose of this Topic Paper is to present the policy background, evidence and conclusions that have been considered in developing the spatial strategy for the Regulation 18 Local Plan. This paper explains the preferred spatial strategy and sets out the national planning policy and guidance relevant to this, as well as the local evidence that has informed the approach taken. It sets out the aims of the spatial strategy and the other options that have been considered for the emerging local plan, within the Sustainability Appraisal (SA).
- 1.4. Following public consultation on the Regulation 18 Local Plan, the Council will consider the feedback received to refine the draft local plan where necessary, including its spatial strategy. This Topic Paper will be kept under review throughout plan preparation to take account of any changes to national policy and any additional evidence.

2. Spatial Portrait

- 2.1. The Council's emerging Local Plan aims to deliver sustainable development across the borough, to meet a range of needs. In order to do this, it is important to have an understanding of the local characteristics.
- 2.2. Tonbridge and Malling borough is located in West Kent and is mainly rural in character, set within a context of a variety of beautiful landscapes and townscapes. The attractiveness of these areas includes a rich historic heritage, a working countryside that includes small villages and hamlets supported by agriculture, horticulture and forestry. The countryside includes some of the very best productive agricultural land in the country and other notable features such as the upper reaches of the River Medway, and areas with rich and diverse wildlife habitats.
- 2.3. The borough stretches to the north to include areas of Walderslade and the Kent Downs National Landscape, to Tonbridge in the south which also includes areas of the High Weald National Landscape. The borough also extends from the historic village of Ightham in the west, to settlements in the Medway Valley in the east, including Aylesford.
- 2.4. Tonbridge is the borough's principal town, offering a wide range of services and facilities. Other large settlements and urban areas include West Malling, Borough Green, Hadlow, Hildenborough,

settlements in the Medway Gap, Snodland, part of Walderslade, and East Peckham. Kings Hill is a recent and comprehensively master planned mixed-use community on the former West Malling Airfield. Kings Hill includes commercial floorspace and dwellings together with shops, schools and other community and recreation facilities.

- 2.5. Overall, the borough benefits from proximity to London and the Kent coast. There are four railway lines that pass through the borough: London to Ashford via Maidstone East, London to Dover and Ramsgate via Tonbridge and the Medway Valley Line, with rail services to Hastings and Redhill also available from Tonbridge. Within the borough there are various strategic and prominent local roads, including the A20, M20, A21, A227, A228, M2, A25, A26, A229 and M26 roads. These roads connect the borough to other boroughs, including the M25 motorway and the channel ports.
- 2.6. The longstanding designation of the west of the borough as Metropolitan Green Belt has resulted in much development coming forward outside of the Green Belt. This has resulted in a focus of development to the east of the borough, where many new housing estates have coalesced, particularly along the A20 London Road and through to Maidstone.
- 2.7. The River Medway and its tributaries pass through the borough, and an extensive area of the borough lies within flood zones. The improved Leigh Barrier and Hildenborough embankment scheme to the west of Tonbridge should be complete by winter 2025/26; these measures help to mitigate flood risk downstream for communities including Hildenborough and Tonbridge.
- 2.8. The geography and landscape of the borough is strongly influenced by the underlying geology with alternating bands of hard and soft rock leading to a strong east-west grain to the landscape. This geological sequence is important in determining the character of the landscape and the historic nature of land use, with predominantly agriculture on the low-lying areas and woodland on the higher ground. The underlying geology has resulted in extensive areas of quarrying in the borough, some still active, whilst others, where mineral working has been restored, providing space for new development of housing and recreation.
- 2.9. Tonbridge and Malling has been a popular place to live for many decades, particularly as accessibility and connectivity has improved. More recently, improved internet speeds and remote working have also contributed to the borough being an attractive place to live. It has increased local spending and demand for local services and has also raised expectations about lifestyle and living spaces.
- 2.10. The increasing attractiveness of the borough as a place to relocate and live has led to an increase in house prices making it more difficult for people to be able to buy or indeed rent their own home. This is a key challenge that this Local Plan will need to address. Traditional and modern businesses thrive where established and new communities have flourished, but the pressures on infrastructure and the diverse natural environment are demanding.
- 2.11. The location and scale of future growth in the borough will need to have regard to these local characteristics to ensure development is sustainable.

3. Policy Context

- 3.1. Local planning authorities are required to address the requirements set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (PPG).

National Planning Policy Framework – December 2024

- 3.2. At the heart of the NPPF is a presumption in favour of sustainable development, which plans should pursue positively throughout their preparation. Paragraph 7 in the NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.
- 3.3. Paragraph 8 of the NPPF identifies that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. The three objectives are:
- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 3.4. Paragraph 9 of the NPPF confirms that planning policies should play an active role in guiding development towards sustainable solutions, but in doing so, should take local circumstances into account, to reflect the character, needs and opportunities of their area.
- 3.5. Paragraph 11 of the NPPF states for plan-making that:
- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development

in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

- 3.6. Paragraph 20 of the NPPF confirms that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:
- a. homes (including affordable housing), employment, retail, leisure and other commercial development;
 - b. infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c. community facilities (such as health, education and cultural infrastructure); and
 - d. conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 3.7. Paragraph 22 of the NPPF sets out that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
- 3.8. Paragraph 36 of the NPPF states that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are considered 'sound' if they are:
- a. Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.
- 3.9. Paragraph 77 of the NPPF confirms that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant

extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). In identifying such sites, local planning authorities should:

- a. consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
- b. ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
- c. set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well designed and beautiful homes to meet the needs of different groups in the community; and
- d. make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation.

- 3.10. Paragraphs 82 and 83 of the NPPF relate to rural housing and note that planning policies should be responsive to local circumstances and support housing developments that reflect local needs, including affordable housing. It also notes that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.
- 3.11. Paragraph 87 of the NPPF in relation to building a strong and competitive economy, advises that planning policies should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters of networks of knowledge and data-driven, creative or high technology industries, storage and distribution operations at a variety of scales and the expansion and modernisation of other industries.
- 3.12. Paragraph 88 of the NPPF confirms that planning policies should enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 3.13. Paragraph 90 of the NPPF sets out that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. It states further that local planning authorities should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. It also recognises the role that residential development plays in ensuring the vitality of centres.
- 3.14. Paragraph 110 of the NPPF confirms that the planning system should actively manage patterns of growth in support of these objectives. It notes that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. However, the NPPF recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account for plan-making.

- 3.15. Paragraph 111 of the NPPF states that planning policies should support an appropriate mix of uses across the area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.
- 3.16. Paragraph 124 of the NPPF confirms that planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. This should include ways that makes as much use as possible of previously developed or 'brownfield' land.
- 3.17. Paragraph 170 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 3.18. Lastly, paragraph 189 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. It notes that the scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Planning Practice Guidance

- 3.19. The National Planning Practice Guidance (PPG) on plan making states that plans set out a vision and framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.
- 3.20. Authorities must therefore prepare local plans by assessing future needs and opportunities for their areas, exploring and identifying options for addressing these needs, and setting out a preferred approach to delivering for these identified needs. The PPG advises that the process should involve gathering evidence, carrying out a sustainability appraisal, and effective engagement and consultation with local communities, businesses and other interested parties. In this way, the Local Plan should be able to show how the presumption in favour of sustainable development will be applied locally.

Tonbridge and Malling Corporate Plan 2023-2027

- 3.21. The Council's Corporate Plan, approved in 2023, sets out a vision and strategic priorities to guide the work of the Council and its investment priorities. The strategic priorities are:
- a) Efficient services for all our residents, maintaining an effective council
 - b) Sustaining a borough which cares for the environment
 - c) Improving housing options for local people whilst protecting our outdoor areas of importance
 - d) Investing in our local economy to help support residents and businesses and foster sustainable growth.

- 3.22. The Council recognise that local communities have varying needs and the approach to delivering these priorities will need to be tailored to reflect this, and these strategic priorities are embedded within the Regulation 18 Local Plan.

Adopted Local Plan

- 3.23. The current adopted Local Development Framework which comprises the adopted Core Strategy (September 2007), Development Land Allocations Development Plan Document (DPD) (2008), Tonbridge Central Area Action Plan (2008), Managing Development and the Environment DPD (2010) and Saved Policies document (1998).
- 3.24. The adopted Core Strategy sets out the current spatial strategy and seeks to guide the location of development and growth to support the principle of sustainable development. The spatial strategy in the adopted Local Plan is considered to have been positively delivered, in terms of delivering housing and economic in sustainable locations within the borough. The site allocations set out in the Development Land Allocations DPD and Tonbridge Central Area Action Plan have largely now been delivered.
- 3.25. Given the age of the adopted suite of documents, all of the policies and the spatial strategy are in need of review as part of the preparation of the emerging local plan. The emerging local plan will look towards 2042. The new local plan will take account of up-to-date national planning policy and guidance, as well as local priorities, in order to develop a growth strategy that will support land for development in appropriate locations during the new plan period.

4. Evidence

- 4.1. The latest standard method, introduced by the Government in December 2024 with March 2025 and May 2025 updates using the affordability ratio and housing stock dataset, identifies that the local plan must deliver 1,097 dwellings per year. This means that our gross housing need figure is to deliver 19,746 homes during the plan period between 2024 – 2042.
- 4.2. The Local Plan must, as part of the housing supply, take into account our existing commitments (completions and extant permissions) and a windfall allowance which is based on our understanding of small sites coming forward. Further detail is provided in the Housing Windfall Methodology Topic Paper. This leaves a residual net need for 12,634 dwellings over the plan period.

Strategic Housing Market Assessment Report

- 4.3. The Strategic Housing Market Assessment (SHMA) (2025) provides evidence on the 'Housing Market Areas' that exists in the borough. A 'Housing Market Area' (HMA) is defined within the PPG22 as 'a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work'. Defining the HMA within the district can help to support decisions on where to provide new housing development and help guide the spatial strategy.
- 4.4. The SHMA identifies that Tonbridge and Malling does not have its own distinct Housing Market Area (HMA) and is instead influenced by larger settlements outside the borough such as Tunbridge Wells,

Maidstone and Sevenoaks. Tonbridge and Malling therefore forms part of the West Kent HMA, encompassing Tonbridge and Malling, Tunbridge Wells, Maidstone and Sevenoaks.

- 4.5. To understand our housing requirements, the SHMA considers a number of matters relating to housing in our borough including the housing market, housing need, affordable housing and the types and sizes of homes required to meet community needs. The Local Plan is then required to provide a sufficient supply and mix of sites to meet our overall housing requirement.
- 4.6. Our overall housing development needs over the plan period include:
- A need to deliver approximately 647 affordable homes per annum¹.
 - 33 Gypsy and Traveller and Travelling Showpeople pitches
 - 950 additional housing units with support (sheltered/retirement housing)
 - 220 housing units with care, such as extra care units
 - 720 nursing and residential care bedspaces
- 4.7. The spatial strategy is identifying sufficient land to meet the identified housing needs of the borough.
- 4.8. Historically, there has been a significant under delivery of housing in the borough and paragraph 78b of the NPPF stipulates that where this is the case that a 20% buffer is therefore required to be added to the five-year supply, which equates to an additional 1,097 dwellings being added / frontloaded from subsequent years to the five-year supply.
- 4.9. The local plan on submission will therefore need to show a five-year supply of housing against the housing requirement, with a 20% increase, and will need to demonstrate that it can deliver 6,540 homes in its five-year supply. Further work is required on the detailed phasing of those proposed allocations to inform the Regulation 19 Local Plan.

Economy Study

- 4.10. The Economy Study (2025) establishes the employment land and floorspace requirements for Tonbridge and Malling between 2024 to 2042.
- 4.11. The study considers three different scenarios of future employment space requirements in the borough. These indicate the broad scale and type of growth arising from different approaches to modelling future employment space needs; forecast economic growth, past development trends, and potential housing growth and range from 290,000 sqm to 538,700 sqm. However, it recommends the labour demand scenario for office requirements and the development trends scenario for B2 and B8 development. This provides an overall gross requirement of 361,500 sqm, which equates to an 83.2 ha land requirement, of which 60,500 sqm is identified for office use.
- 4.12. Once employment floorspace losses and gains, as well as consented but not yet implemented employment developments have been factored in, there remains a net need of 65,111 sqm, of which

¹ Please note that it will not be possible to deliver this level of affordable housing on an annual basis, therefore this figure is provided as a guide to show our exceptional affordable housing need.

52,644 sqm is identified for office use.

- 4.13. The supply of industrial land (B2 and B8) is positive and the council is able to deliver suitable sites to meet this need. The Local Plan seeks to allocate 78,700 sqm of B2 and B8 floorspace. This provides a surplus of employment land over scenario 2 (development demand). This is considered as a positive position to ensure that employment land comes forward alongside the increase in housing required to be delivered as per the Government's standard method. It also accounts for the high contribution of existing commitments allowing supply to move towards the labour supply scenario.

Land Availability Assessment

- 4.14. The Land Availability Assessment (LAA) (2025) is an essential piece of evidence which is required to support the local plan process. It is a technical assessment which considers the availability, suitability and achievability of land identified in the borough for possible development.
- 4.15. This evidence assists the Council in identifying what land in the borough could be available to deliver housing, economic development, and other needs. These sites are subject to detailed testing and assessment including through the site selection process (see the Site Selection Topic Paper), the Sustainability Appraisal (SA), the Habitats Regulation Assessment (HRA), Strategic Flood Risk Assessment, transport modelling and other infrastructure testing. Overall, the LAA forms an integral part of the local plan process providing the starting point for considering sites and an indication of site deliverability and capacity.
- 4.16. All of the sites identified as suitable, available and achievable in the LAA are proposed for inclusion in the Regulation 18b Local Plan. A further Call for Sites exercise is underway to identify any additional sites that should be considered. Any new sites will be subject to the same assessment process, and should any be identified as suitable and deliverable, then subject to other evidence, they could be considered for inclusion in the Regulation 19 Local Plan.

Green Belt

- 4.17. Approximately 71% of Tonbridge and Malling is designated as Metropolitan Green Belt. Many hamlets and some small villages are 'washed over' by the Green Belt designation, while larger settlements are inset from it. The main aim of Green Belt is to prevent urban sprawl by keeping land permanently open, but like all countryside, it can also provide multifunctional benefits including for recreation, nature conservation, food production and flood mitigation.
- 4.18. The Stage 1 Green Belt Assessment (2025) undertook a borough wide review of the Green Belt. The Green Belt was subdivided into 'parcels', and each tested against the five Green Belt purposes in the NPPF, which are:
- a) To check the unrestricted sprawl of the large built-up areas.
 - b) To prevent neighbouring towns merging into one another.
 - c) To assist in safeguarding the countryside from encroachment.
 - d) To preserve the setting and special character of historic towns.

e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 4.19. The report also identifies fundamentally important areas within the Green Belt, where future growth should be considered carefully to ensure that it does not fundamentally undermine the purposes of the Green Belt taken together across the plan area. The spatial strategy predominantly proposes development outside of these areas. However, some limited amount of development is proposed to the south of Snodland, but due to its scale and proximity to existing settlement, is not considered to not fundamentally undermine the purposes (taken together) of the remaining Green Belt in accordance with paragraph 146 of the NPPF.
- 4.20. The Stage 2 Green Belt Assessment (2025) is a spatially focussed and granular study to identify and assess the performance of smaller sub-areas against the five Green Belt purposes, consider the role of the sub-areas as part of the wider strategic Green Belt, identify provisional grey belt, consider boundaries and categorisation and recommends whether the sub-area should be considered further either in isolation, or in combination with other sub-areas. This study focusses on areas of Green Belt around sustainable settlements and motorway junctions, as these are considered by the council to be to be potential sustainable locations for growth.
- 4.21. Where the Stage 2 Green Belt Assessment recommends a sub-area for further consideration either in isolation or combination, the Council considered the potential to allocate that land for development, having regard to the full suite of other relevant evidence. Around Tonbridge and Snodland, the spatial strategy identified some growth within sub-areas that were not recommended for further consideration. In these instances, the growth is located not only around sustainable settlements that are toward the top of the settlement hierarchy offering access to a wide range to services and facilities, but also have easy access to a train station, therefore proposing development in locations that offer a choice of transport modes in accordance with paragraph 110 of the NPPF.
- 4.22. Work is currently underway to consider whether there is potential to extend the Green Belt boundary to the east of West Malling to the bypass as well as to the east of the bypass towards Watlingbury Road, East Malling. This evidence will be completed prior to Regulation 19. In the meantime, a Local Green Gap policy has been progressed for the area east of the West Malling bypass, should a Green Belt extension not be supported by evidence.

Landscape Character Assessment

- 4.23. The Tonbridge and Malling Landscape Character Assessment (LCA) (2025) provides a comprehensive and up-to-date borough wide assessment of the borough's landscape in terms of the physical and cultural influences that have shaped it and the perceptual qualities it possesses. This nests within the National Character Areas and the Landscape Assessment of Kent (2004) but is at a local scale and mapped to a finer grain of detail.
- 4.24. From the data gathered, 12 Landscape Character Types (LCTs) were identified and within these, 31 landscape character areas. The Tonbridge and Malling LCA provides a detailed discussion of the key characteristics of the LCTs and LCAs along with the forces for change and landscape guidelines should development come forward in the respective areas.

Landscape Sensitivity Assessment

- 4.25. The Landscape Sensitivity Assessment (LSA) (2025) focuses on the relative landscape sensitivity of different landscape areas within the borough located around sustainable settlements and around motorway junctions to different types and scales of residential and employment development, in order to help inform decisions on the potential location of housing and employment growth as part of the Regulation 18 Local Plan, but also to guide consideration of individual planning applications.
- 4.26. The LSA provides a sensitivity rating for each parcel of land to a range of development typologies, based on a number of criteria and judgements, together with broad landscape mitigation guidelines. This evidence base helps to guide decisions on sites, and whether to allocate in relation to landscape impacts.

Landscape and Visual Appraisal

- 4.27. The Landscape and Visual Appraisal (LVA) (2025) assesses the suitability of potential development sites to accommodate growth (in landscape and visual terms), around sustainable settlements and around motorway junctions in the borough, and identifies any site-specific constraints, design considerations and mitigation (to avoid or minimise adverse landscape effects) that may need to be considered. For each potential development site, an analysis of the potential landscape and visual effects of development was undertaken. This includes identification of the potential effects of development on landscape character and features, National Landscapes, existing settlement form and setting, visual amenity and cumulative effects as well as the constraints and opportunities in landscape terms for each site.
- 4.28. For some potential development sites, the LVA concluded that development would be unacceptable from a landscape and visual perspective, and or where their impacts would not be able to be mitigated. In these instances, those sites are not included in the Regulation 18 Local Plan.

Green Gap Study

- 4.29. As part of this Local Plan, the council has explored the potential for Green Gaps - a designation which helps to avoid coalescence and preserve the separate characters and identities of different settlements by providing physical and visual breaks. The designation of Green Gaps, and policies to protect them, can help in maintaining open landscapes between settlements, contributing to the amenity of an area.
- 4.30. The Green Gap Study (2025) identifies that there is support in the NPPF for maintaining the identifiable characteristics of places, and that any Green Gaps 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.
- 4.31. The Study focussed on land in the north east of the borough, outside of the Green Belt and National Landscape designations (as these designations already help to perform an anti-coalescence function) and which is under pressure from development due to the lack of designations that may result in the merging of individual settlements. The study considers the merits of two locations, one between Kings Hill, West Malling, East Malling and the Medway Gap, and another between Aylesford, Eccles and

Burham. The study considers that the latter has a substantial number of designations in the area between those settlements including Sites of Special Scientific Interest and Local Wildlife Sites, which reduce the risk of coalescence occurring. However, the former has few existing designations, increasing the pressure for development in that area, and as such a Green Gap would be suitable in that location.

Strategic Flood Risk Assessment

- 4.32. In line with the requirements of the NPPF, the Council have undertaken a Level 1 Strategic Flood Risk Assessment (SFRA) (2025) for the district. This sets out a high level and strategic assessment of the risk of flooding from all sources (fluvial, coastal/tidal, surface water, groundwater, reservoir and sewer) within the borough, and screens potential development sites against these sources in order to identify potential risk. This evidence helped the Council to identify land at the highest risk of flooding within the borough so that development can be focused within those areas at lower risk of flooding. Given the River Medway, River Bourne and their tributaries run through Tonbridge and Malling and low lying topology in the south of the borough, large parts of the borough are at risk from flooding.
- 4.33. A SFRA Level 2 Scoping has also been carried out to identify which potential development sites may require a Level 2 SFRA to be undertaken to understand potential flood risks in more detail, where development cannot be accommodated on land outside of Flood Zone 2 and 3. This work will be carried out prior to Regulation 19 and will provide site specific guidance and recommendations for any potential allocations.

Habitats Regulations Assessment

- 4.34. The Conservation of Habitats and Species Regulations 2017 (Habitat Regulations) as amended, transpose the requirements of EC Directive 2009/147/EC on the Conservation of Wild Birds (the Birds Directive) and EC Directive 94/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive). The Habitat Regulations set out a requirement for a Habitats Regulations Assessment (HRA) to be applied to all land use plans to assess the potential effect of a plan against the conservation objectives of European Sites including Special Area of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites.
- 4.35. There are a number of European Sites within the borough that need to be protected, these include the North Downs Woodland SAC and Peters Pit SAC. The HRA considers if the Regulation 18 Local Plan growth strategy (alone and in combination within surrounding growth) may detrimentally impact any of the European Sites identified (either within or outside the district).
- 4.36. The HRA (2025) confirms that the Regulation 18 Local Plan will not result in an adverse effect the European Sites within the borough or on the Medway Estuary and Marshes SPA/Ramsar Site, Queendown Warren SAC, Thames Estuary & Marshes SPA/Ramsar site or Ashdown Forest SAC/SPA which all fall outside of the borough, from air quality, water quality (level and flow) or water quality.
- 4.37. The HRA does identify that there is potential for development to contribute to increase recreational footfall on the North Downs Woodland SAC, both alone and in combination. The HRA recommends that the allocation at Land north of Holborough Lakes, Snodland, which is approximately 600m from the SAC and will deliver 1,300 dwellings, should take the opportunity to deliver a large area of semi-natural publicly accessible open space as part of its development. There is no formal standard for this,

but a widely used standard is the SANG standard of 8ha per 1000 population (although this area would not be a SANG since need for mitigation has not been identified in this HRA or that of neighbouring local plans). Since this new open space would be closer to the allocation than the SAC, and on less steep ground, this would underline a conclusion of no adverse effect on integrity.

- 4.38. The HRA will be updated further as further site information and evidence becomes available as the local plan progresses towards its Regulation 19 stage and submission.

Sustainable Settlement Study

- 4.39. The Sustainable Settlement Study (2025) surveyed the settlements within Tonbridge and Malling to determine the services and facilities present and the accessibility to existing public transport networks and frequency of transport provision, providing a basis for understanding the sustainability of settlements across the borough. This involved defining a list of key services, important community services and other community services to reflect their relevant importance and then applying scores to each service, including the availability and frequency of public transport.
- 4.40. In addition to the quantitative nature of the scoring system, other qualitative factors in determining a settlement's sustainability were considered to understand where a settlement should sit within the settlement hierarchy. This included factors such as transport links, accessibility to larger centres, environmental constraints and the location of settlements and whether they support or share services with a neighbouring settlement. Ultimately, the sustainability of the larger settlement provides a supporting role for settlements that surround it. This approach reflects one of the main objectives of the NPPF, which is to focus growth where residents have the opportunity to use non-car modes of travel.
- 4.41. This Study has been used to inform the Settlement Hierarchy and the spatial strategy within the Regulation 18 Local Plan. The table below sets out the new settlement categories and hierarchy. All settlements that are categorised as types 1 - 4 are considered to be sustainable settlements and have development boundaries identified within the Regulation 18 Local Plan.

Settlement Category	Settlement name
Tier 1: Principal Service Centre	Tonbridge and Hilden Park, Medway Gap, Walderslade
Tier 2: Service Centre	Snodland, Borough Green, West Malling, Kings Hill
Tier 3: Primary Village	Hildenborough, Hadlow, East Malling, East Peckham, Watlingbury, Wouldham
Tier 4: Secondary Village	Aylesford Village, Hale Street, Burham, Snoll Hatch, Wrotham, Eccles, Leybourne Chase, Peter's Village, Plaxtol, Platt, Ightham, Birling, Ryarsh, Mereworth & Herne Pound

Tier 5: Other rural settlements	Stansted, Offham, Shipbourne, Fairseat, Addington, Addington Clearway, Golden Green, West Peckham, Wrotham Heath, Dunks Green, Crouch, Trottiscliffe, Blue Bell Hill
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Other evidence

- 4.42. In addition to the above evidence base documents that are pertinent to the spatial strategy of the borough, the Council has also produced a number of other evidence base documents that have informed policies within the plan, and these are available to view on the [Local Plan evidence base](#) webpage.
- 4.43. There are also a number of existing evidence base documents that will be updated prior to the publication of the Regulation 19 Local Plan, as well as a number of new evidence base documents that will be published in the intervening period between the Regulation 18 and Regulation 19.

5. Development of the Spatial Strategy

Regulation 18 (2022)

- 5.1. The first stage of the Council's local plan process was the publication of a high level Regulation 18 consultation document in 2022. The document that was consulted upon between 22 September and 3 November 2022. It provided an opportunity to engage local communities, partner organisations and stakeholders on a range of important topic areas. It set out the key issues and challenges for the borough and considered how to accommodate growth over the period to 2040. The identified housing need was 839 units/annum, or 15,941 units (gross) over the plan period. Once this figure was adjusted to take account of extant permissions and a windfall allowance, the net housing need figure was identified as 9,245 units.
- 5.2. The consultation document and accompanying Sustainability Appraisal (SA) set out five spatial strategy options to meet identified needs and invited comments on these. The spatial strategy options identified at this stage were:
- Option 1 - Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty.
 - Option 2 - Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements.
 - Option 3 - Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements.
 - Option 4 - Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities.
 - Option 5 - New Settlement: Development focussed on sites within (greenfield as well as PDL)

urban areas, rural service centres and other rural settlements, as well as a new settlement/s.

- 5.3. These options were tested through the Interim Sustainability Appraisal. Although Option 1 received the most support amongst consultation responses, this would locate all development in the north east of the borough, place pressure on existing infrastructure and services in that location, and result in potentially unsustainable patterns of development which would promote the use of the private car to access services and facilities in the south and west of the borough. Option 3 was identified as scoring most positively against the SA objectives, whilst meeting the aim of the plan to deliver sustainable development and would therefore form the basis of the spatial strategy to be taken forward.
- 5.4. However, a revised NPPF was published in December 2024, and updates were also made to Planning Practice Guidance (PPG), including updated guidance released in February 2025 on how to address the changes made to national Green Belt policy in both plan-making and decision making. The changes to the NPPF and PPG, a substantial increase in housing numbers and updated evidence base, resulted in the need to revisit the spatial options to ensure that the plan could progress in accordance with national policy.

Regulation 18 Stage 2 (2025)

- 5.5. The Regulation 18 Local Plan (2025) is a much more detailed plan than the previous Regulation 18 document. The plan contains a vision, detailed policies and proposed allocations to meet the identified needs of the borough. As part of this Regulation 18 stage, eight spatial strategy options have been considered. The options test different yields and distributions of growth across the borough having regard to sites identified to the Council, site assessments, areas of significant constraint, and the updated settlement hierarchy, in order to deliver growth in sustainable locations and reflect the aims and objectives of the Local Plan. There Options considered are:

- Option 1: To maximise growth in all locations within the borough.
- Option 2: To focus growth in and around sustainable settlements within the borough.
- Option 3: To focus growth in and around sustainable settlements within the borough, but excluding any new large extensions of c. 800+ units to existing sustainable settlements (i.e. North of Kings Hill, West Tonbridge, Borough Green, East Malling Research, Holborough, North Tonbridge, Aylesford Lakes, Hildenborough).
- Option 4: To focus growth in sustainable settlements and on large extensions to sustainable settlements of 800+ units North of Kings Hill, West Tonbridge, Borough Green, East Malling Research, Holborough, North Tonbridge, Aylesford Lakes and Hildenborough.
- Option 5: To focus growth in and around sustainable locations outside of the National Landscapes.
- Option 6: To focus growth in and around sustainable locations outside of the Green Belt.
- Option 7: To focus growth in and around sustainable locations outside of the National Landscapes and outside of the Green Belt.
- Option 8: Within existing settlement confines.

- 5.6. A new settlement option, which was considered in the 2022 Regulation 18 Local Plan, was not considered at this stage, as it was no longer considered by the council to be a reasonable alternative following detailed site assessment work as part of the LAA, and the that the identified need could be accommodated in accordance with the updated settlement hierarchy without the need for a new settlement.
- 5.7. These eight options were tested through the Interim Sustainability Appraisal. Options 1, 2, 4 and 5 would likely deliver sufficient growth to meet the net need for 12,634 dwellings over the plan period. However, options 3, 6, 7 and 8 would likely yield insufficient levels of growth to meet that need. The detailed assessment of the options can be found in the Interim Sustainability Appraisal.
- 5.8. The Interim Sustainability Appraisal identified that Option 2 (with elements of Option 4) scored most positively against the SA objectives, whilst meeting identified needs and the objectives of the plan to deliver sustainable development. This option therefore forms the basis of the spatial strategy.

Preferred Spatial Strategy

- 5.9. The spatial strategy, policies and proposed allocations contained within the Regulation 18 (stage 2) Local Plan, are a refinement of the preferred approach identified through the 2022 Regulation 18 consultation document.
- 5.10. The overall development strategy reflects national policy and takes into account local evidence in relation to development needs and constraints of the borough, and consultation responses received during earlier stages of plan making. The proposed spatial strategy presents a justified approach, striking an appropriate balance between meeting future development needs in sustainable locations and protecting and enhancing the natural and built environment for the benefit of all.
- 5.11. The spatial strategy provides for a range of sites in sustainable locations, and includes some large extensions to settlements which could help deliver key pieces of infrastructure needed in the Borough, which would be less likely to be delivered through smaller sites alone.
- 5.12. The largest of the strategic allocations is Land North of Borough Green. This site has capacity to deliver around 3,000 dwellings, alongside other community uses and infrastructure. Parts of the site (around half) is considered to be previously developed land given its former and current minerals extraction site. For the purpose of the Regulation 18 consultation, we have identified that this site has the potential to deliver around 2,000 dwellings within the Plan period, with an additional 1,000 dwellings to be delivered post 2042.
- 5.13. The majority of development proposed is located outside of the Kent Downs and High Weald National Landscapes in line with national planning policy. However, some small-scale growth is identified adjacent to some villages within the Kent Downs National Landscape, in order to provide some limited opportunities to meet the needs in those areas. In each instance, the LVA of those sites indicate that development in those locations will not have a detrimental impact on the special components, characteristics and qualities of the protected landscape, and provide an opportunity to conserve and enhance the natural beauty of the area in accordance with the Protected Landscapes Duty.
- 5.14. Given the 71% coverage of Green Belt within the borough, it is not considered possible to deliver the identified housing need without allocating sites within the Green Belt. In accordance with the NPPF,

opportunities to make as much possible use of suitable brownfield sites and underutilised land and optimise density have been explored and will be explored further prior to Regulation 19. The council have contacted neighbouring authorities to understand whether they are able to meet some or all of this unmet need, thereby removing or reducing the need to allocate sites in the Green Belt. However, from Duty to Cooperate engagement to date, it is considered unlikely that they will be able to meet any of the unmet need. The Regulation 18 Local Plan has therefore identified land for development within the Green Belt to ensure that identified needs can be met. In each instance, the site is identified by the Stage 2 Green Belt Assessment as provisional grey belt, and are all located in locations that promote sustainable patterns of development in accordance with paragraph 148 of the NPPF.

- 5.15. The Interim Sustainability Appraisal identifies Option 2, with elements of option 4, as the most sustainable option. It would deliver growth within and adjacent to the most sustainable settlements as defined within the Sustainable Settlement Study. These have the majority of services and facilities as well as access to sustainable modes of transport. This option has the potential to deliver new facilities, services and infrastructure and reduce the need for trips via the private motor vehicle, which would help to combat the effects of climate change.
- 5.16. The LAA has assessed all site options, and those considered to be suitable, and deliverable have been proposed for development in the Regulation 18 Local Plan. These sites allow the council to meet its identified needs in sustainable locations.
- 5.17. The spatial strategy is supported by a range of policies to guide development on the sites proposed for allocation, and to guide development proposals on other land within the Borough (not allocated for development). The scope of these policies reflects the scope and requirements of the NPPF, whilst taking into consideration local priorities and issues.

6. Next Steps

- 6.1. Following this consultation, the Council will consider responses on the Regulation 18 (Stage 2) Local Plan including the proposed spatial strategy, which will inform preparation of the Regulation 19 Local Plan.
- 6.2. In addition, further evidence will be prepared, where required, to further inform the next stage of the plan including a range of further technical evidence.
- 6.3. The proposed allocations are not set in stone at this stage. Should the Council receive evidence either as part of the consultation or as part of further testing then changes may be made ahead of publishing the Local Plan at Regulation 19 stage. In relation to the strategic sites, further engagement will be undertaken with site promoters regarding further technical assessments, including master planning. Ongoing engagement with neighbouring authorities to meet the Duty to Cooperate and statutory consultees will continue throughout plan making.
- 6.4. As with any Local Plan at Regulation 18 stage, the Council will be undertaking further testing of the Spatial Strategy to inform the Regulation 19 Local Plan. This will include further testing of all sites to confirm their deliverability in relation to constraints, viability and whether the necessary

infrastructure can be provided to support the development, both on their own and cumulatively. Further testing alongside working with infrastructure providers will provide confidence about the deliverability of the spatial strategy in the Regulation 19 Local Plan.

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