

**FINAL  
SUSTAINABILITY APPRAISAL REPORT**



**Tunbridge Wells Borough  
Core Strategy Submission Report**

# FINAL SUSTAINABILITY APPRAISAL REPORT

## Tunbridge Wells Borough Core Strategy Submission Report

Client:

**TUNBRIDGE WELLS  
BOROUGH COUNCIL**

Reference: EN4942/R/4.2.2MN

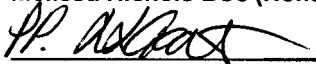
Status: FINAL

Date: April 2009

Issued by: Waterman Energy,  
Environment and Design

Author:

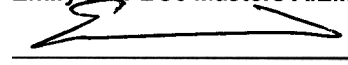
Name **Melissa Nichols BSc (Hons) AIEMA**

Signature  \_\_\_\_\_

Position Senior Consultant

Approved by:

Name **Emily Low BSc Masters AIEMA**

Signature  \_\_\_\_\_

Position Associate Director

Telephone: 0207 928 7888

Fax: 0207 902 0981

[environmental@waterman-group.co.uk](mailto:environmental@waterman-group.co.uk)

[www.waterman-group.co.uk](http://www.waterman-group.co.uk)

---

This report has been prepared by Waterman Environmental, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

---

# SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

## CONTENTS

<b>NON-TECHNICAL SUMMARY .....</b>	<b>1</b>
<b>1. INTRODUCTION .....</b>	<b>1</b>
1.1 The Purpose and Structure of this Report .....	1
1.2 Requirements of the SEA Directive.....	2
<b>2. BACKGROUND .....</b>	<b>4</b>
2.1 Need for SA/SEA.....	4
2.2 The Core Strategy Submission Report .....	4
<b>3. SUSTAINABILITY APPRAISAL METHODOLOGY.....</b>	<b>5</b>
3.1 Overview.....	5
3.2 Consultation.....	7
<b>4. SUSTAINABILITY OBJECTIVES, BASELINE DESCRIPTION AND CONTEXT .....</b>	<b>10</b>
4.1 Relevant Plans, Programmes and Strategies.....	10
4.1.1 National Planning Policy and Guidance.....	11
4.1.2 Regional Planning Policy and Guidance.....	11
4.2 Evidence Base for the Core Strategy.....	12
4.2.1 Tunbridge Wells Core Strategy: Submission Stage, Habitats Regulations Assessment – Appropriate Assessment, 2009.....	13
4.2.2 Accession Mapping Study, 2007 .....	13
4.2.3 Strategic Flood Risk Assessment, 2007.....	13
4.2.4 Strategic Housing Market Assessment, 2008.....	14
4.2.5 Strategic Housing Land Availability Assessment.....	16
4.2.6 Landscape Character Assessment and Capacity Study, 2009.....	17
4.3 Summary of Key Sustainability Issues for the Core Strategy .....	17
4.4 The SA Framework for the Core Strategy.....	17
4.5 Testing the Plan Objectives.....	18
<b>5. ASSESSING OPTIONS AND ALTERNATIVES .....</b>	<b>21</b>
5.1 Appraising the Effects of Alternatives .....	21
5.2 Business as Usual Scenario.....	21
5.3 Appraisal of Options and Alternatives .....	21
5.3.1 Spatial Option 3: Disperse development throughout the Borough's settlements .....	24
5.3.2 Spatial Option 4: New expanded town.....	24
5.3.3 Economy 1: .....	25
5.3.4 Transport (b):.....	25
5.3.5 Housing 4: .....	25
5.3.6 Housing 6: .....	25
<b>6. SIGNIFICANT CHANGES TO THE CORE STRATEGY .....</b>	<b>25</b>
<b>7. HOW THE SA HAS INFLUENCED PLAN DEVELOPMENT .....</b>	<b>29</b>
<b>8. APPRAISAL OF THE CORE STRATEGY POLICIES .....</b>	<b>31</b>
8.1 Sustainability Implications for the Core Strategy (Spatial Strategy and Core Policies) .....	32
8.2 Secondary, Cumulative and Synergistic Effects .....	33
8.3 Mitigating Measures .....	35
<b>9. SUMMARY AND IMPLEMENTATION .....</b>	<b>41</b>
9.1 Summary .....	41
9.2 Links to other Tiers of Plans, Programmes or Projects .....	41
9.3 Next Stage of the Planning Process .....	42
9.3.1 Appraising significant changes resulting from representations.....	42
9.3.2 Making decisions and providing information.....	42
9.3.3 Proposals for Monitoring .....	42

## APPENDICES

APPENDIX A	TESTING THE CORE STRATEGY OBJECTIVES AGAINST THE SA FRAMEWORK .....	50
APPENDIX B	RESULTS SUMMARY: APPRAISAL OF THE SPATIAL STRATEGY, GENERAL POLICIES AND PLACE-SHAPING POLICIES .....	55
APPENDIX C	TESTING THE SPATIAL STRATEGY AGAINST THE SA FRAMEWORK .....	58
APPENDIX D	TESTING THE GENERAL POLICIES AGAINST THE SA FRAMEWORK .....	76
APPENDIX E	TESTING THE PLACE-SHAPING POLICIES AGAINST THE SA FRAMEWORK .....	115

# SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

## TABLES

TABLE 1: SEA REQUIREMENTS AND WHERE THESE ARE ADDRESSED IN THIS REPORT

TABLE 2: KEY ISSUES FOR THE LDF PREPARATION

TABLE 3: THE SA FRAMEWORK FOR THE CORE STRATEGY

TABLE 4: LIST OF OPTIONS AND ALTERNATIVES CONSIDERED FOR THE CORE STRATEGY DPD

TABLE 5: SUMMARY OF CUMULATIVE EFFECTS

TABLE 6: PROPOSED MITIGATION MEASURES

TABLE 7: PROPOSALS FOR MONITORING THE SIGNIFICANT AND UNCERTAIN EFFECTS OF THE CORE STRATEGY

**NON-TECHNICAL SUMMARY**

**INTRODUCTION**

This Sustainability Appraisal (SA) has been undertaken for the Submission Core Strategy Development Plan Document (DPD). It aims to ensure that sustainability considerations i.e. the social, environmental and economic effects are taken into account during the plan making process.

**BACKGROUND AND METHODOLOGY**

The Core Strategy, when adopted, will form part of the suite of Local Development Documents, referred to as the Local Development Framework. The Core Strategy is a key document that will set out the vision for Tunbridge Wells Borough until 2026. It will be a strategic spatial plan and contain a number of strategic policies for the Borough.

The Core Strategy is a strategic document that will set the broad pattern for the development of new housing, employment and community facilities. More detailed policies on specific issues and the allocation of specific sites for development will be included within other planning documents.

The SA of the Core Strategy has been undertaken in line with Government guidance included within the ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents’ published in November 2005.

**SUSTAINABILITY OBJECTIVES, BASELINE DESCRIPTION AND CONTEXT**

Waterman Environmental undertook a review of key planning policy and baseline information for the Borough as part of an initial ‘Scoping Process’. The results of this exercise were documented in a ‘Scoping Report’. Since this report was produced, the Government has issued a number of new policy documents and guidance. A number of these documents emphasise the issues of sustainability and climate change. It is important that these issues drive the development of the new plan. The spatial location of new development can have an important influence on both the level of carbon emissions which contribute to climate change as well as vulnerability to consequences such as flood risk. Key considerations going forward include setting high standards of environmental performance for new development to deliver the Government’s aspirations for ‘zero carbon development’ and improved resource efficiency.

The SA uses a number of sustainability objectives (SO) to provide a systematic way of evaluating the plan. These objectives were consulted on as part of the Scoping Process and include the following:

- SO1 To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home;
- SO2 To improve the health and wellbeing of the population and reduce inequalities in health;
- SO3 To reduce poverty and social exclusion;
- SO4 To raise educational achievement across the Borough and develop the opportunities for everyone to acquire the lifetime skills needed to find and remain in work and support the long-term competitiveness of the Borough;
- SO5 To reduce crime and the fear of crime;
- SO6 To improve accessibility to all services and facilities, including employment, education, health services, shopping, green space, culture, leisure, recreation (CLR) facilities and a sustainable tourism sector;
- SO7 To improve efficiency in land use through the reuse of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance;
- SO8 To reduce pollution (to land, air and soil) and maintain and improve the water quality of the Borough’s rivers, and to achieve sustainable water resources management;
- SO9 To address the causes of climate change through reducing emissions of greenhouse gases;

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

- SO10 To conserve and enhance the Borough's biodiversity;
- SO11 To protect, enhance and make accessible for enjoyment, the Borough's countryside and historic environment;
- SO12 To improve travel choice and to reduce the need for travel, particularly by car to reduce road congestion;
- SO13 To reduce the impact of resource consumption by using sustainably produced and local products and reducing general waste generation and disposal;
- SO14 To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough;
- SO15 To ensure high and stable levels of employment so everyone can benefit from economic growth of the Borough; and
- SO16 To stimulate and sustain economic growth and competitiveness across the Borough.

It is important that the objectives for the Core Strategy, which are set out in the Submission Core Strategy Document, are consistent with sustainability principles. To ensure this, the compatibility of the Core Strategy Objectives was assessed against the sustainability objectives listed above. Overall, the appraisal indicates that the Core Strategy Strategic Objectives are broadly sustainable.

### ASSESSING OPTIONS AND ALTERNATIVES

An Initial SA of the Tunbridge Wells Borough Issues and Options Report tested four main spatial options and alternatives for the Borough up to 2026, and a number of policy options to address six key themes for the Core Strategy. The Initial SA found that the most sustainable spatial options have been selected for inclusion within the Core Strategy.

### ASSESSING THE CORE STRATEGY (SPATIAL STRATEGY AND CORE POLICIES)

The SA assessed the Spatial Strategy and Core Policies for the Core Strategy against the 16 sustainability objectives (listed above) to identify the potential environmental, social and economic effects for the Borough. The appraisal shows that the Spatial Strategy and Core Policies are broadly sustainable. In particular, the appraisal shows that the Core Strategy should have major benefits for the Borough through:

- The provision of affordable homes;
- Improvements to health and wellbeing;
- Reducing inequalities in health, poverty and social exclusion;
- Reducing crime and the fear of crime;
- Improving accessibility to facilities and services for everyone;
- Improving travel choice and reducing the need to travel;
- Ensuring high and stable levels of employment;
- Stimulating the economy;
- Reducing greenhouse gas emissions; and
- Reducing the impact of natural resource consumption.

However, the appraisal did identify some minor negative effects or uncertain effects for some Sustainability Appraisal objectives. In some cases, the Core Strategy could do more to benefit sustainability in the Borough by better addressing certain sustainability issues, or including more detailed policies or guidance to make sure the Core Strategy is implemented in a way that will deliver these benefits. A summary of these sustainability issues is provided below.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### Education and Training

The Local Development Framework needs to support initiatives that will make sure all members of the community have access to opportunities to find and remain in work by ensuring facilities are available to gain required skills. This will also have long-term benefits for the Borough's local economy.

### Reuse of Previously Developed Land and Existing Buildings

The Core Strategy will ensure the development of previously developed land (PDL) and the reuse of existing buildings prior to the development of 'greenfield' sites. However, due to the level of development required in the Borough, some development may need to be delivered on greenfield sites.

### Biodiversity

Due the level of development required in the Borough, some development may need to be delivered on greenfield sites in the long-term, which may result in adverse effects on biodiversity. Greenfield sites should also only be released for development where they would not have a detrimental impact on sites designated for biodiversity value in the Borough.

### Countryside and Historic Environment

As mentioned above, due to the level of development required in the Borough, some development may need to be delivered on greenfield sites in the long-term, which may result in adverse effects on the Borough's countryside and historic environment in the long-term. The Core Strategy needs to make sure that new development is only permitted in those areas capable of accommodating development as identified in the Tunbridge Wells Borough Council Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into all new developments.

## RECOMMENDATIONS AND MITIGATION MEASURES

The SA has identified a number of areas where the Core Strategy or wider Local Development Framework could reduce potentially adverse effects (including those highlighted above) or increase beneficial effects. The key recommendations and mitigation measures proposed are:

- Given the high number of biodiversity constraints located within the Borough, more detailed guidance is required on how to design for biodiversity;
- Greenfield sites should only be released for development where they will not have a detrimental impact on sites designated for biodiversity or landscape value;
- Make sure that new development is only permitted in those areas capable of accommodating development as identified in the Tunbridge Wells Borough Council Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into all new developments;
- Need to ensure new affordable housing is spatially integrated to promote the development of mixed and balanced communities;
- A policy should be developed to ensure additional residential development does not result in the capacities of existing health care and recreation/leisure facilities being exceeded;
- The Core Strategy or wider LDF should support initiatives that will address the need to raise educational achievement across the Borough or to develop opportunities for everyone to acquire the lifetime skills needed to find and remain in work;
- Prioritise new jobs for local residents where possible;
- Make sure footpaths, cycleways and public transport infrastructure such as bus stops are convenient and safe for users across the whole Borough;
- Ensure workers have the opportunity to access sustainable modes of travel, particularly between residential and employment uses in Paddock Wood;
- Ensure public transport is affordable to all;
- Provide more detailed policies and/or guidance to successfully implement sustainable design and construction and transport policies;

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

- Encourage developments to be in line with the waste hierarchy – waste prevention, reuse, recovery and recycling of waste during design, demolition and/or construction and operation; and
- Where viable, consider requiring financial contributions towards the provision of offsite renewable or community heating schemes.

### IMPLEMENTATION AND MONITORING PROPOSALS

To ensure the Core Strategy is successful in the long-term, it is important that the Core Strategy is implemented properly. To achieve this, the Core Strategy will need a number of detailed policies and/or supplementary guidance documents on key issues, such as sustainable design and construction. The Core Strategy must link in with plans and programmes of other organisations such as the Kent County Council, which may be better placed to achieve greater sustainability benefits for areas such as education and transport. The Core Strategy must include links to other planning documents which are being produced as part of the Borough's Local Development Framework (LDF).

A number of recommendations have been made to monitor the implementation of the Core Strategy and the results may be reported in the Annual Monitoring Report prepared by the Council.

### SUMMARY AND NEXT STAGE OF THE PLANNING PROCESS

The SA process has helped to inform the preparation of the Core Strategy DPD, with recommendations put forward in earlier stages and throughout the appraisal process, to allow incorporating into the Preferred Options and Submission Reports. This SA demonstrates that the Strategic Objectives, Spatial Strategy and Core Policies presented in the Core Strategy Preferred Options Report generally accord with the principles of sustainable development. A range of positive and very positive effects have been recorded against most of the sustainability objectives. A number of recommendations and mitigation measures have been identified for the policies of the Core Strategy to help mitigate potentially adverse effects and maximise positive effects. Ultimately, success of the Core Strategy will depend on implementation.

#### **Appraising Significant Changes resulting from Representations**

The Core Strategy has now been finalised for submission to the Secretary of State for an independent examination. This SA Report provides part of the evidence base and will be used to assess the soundness of the Core Strategy.

As a result of the examination, the Inspector will produce a report with recommendations which will be binding upon the Planning Authority. Where the Inspector suggests significant changes in the binding report, the SA will be amended by the Planning Authority to show these changes have been appraised.

#### **Making decisions and providing information**

The information in the SA Report, and responses to the final consultation, will be taken into account in the Examination, and incorporated, if necessary before it is finally adopted. An SA/SEA adoption statement will be produced to accompany the adopted Core Strategy. This will be published on the Council's website and made available to the public and statutory bodies in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 36 of the Town and Country Planning (Local Development Regulations) 2004.

#### **Proposals for Monitoring**

The Council will be required to monitor predicted significant effects of the Core Strategy. This SA Report identifies a draft monitoring framework to monitor these effects. A final agreed list of indicators will be provided when the Core Strategy is adopted.



## 1. INTRODUCTION

Tunbridge Wells Borough Council (TWBC) is in the process of preparing a new document called the Core Strategy, which will set the strategic pattern of development and strategic planning policies for the Borough to 2026. To help inform the preparation of the Core Strategy, the Council have produced a Submission Core Strategy Report for consultation. This report documents the results of a Sustainability Appraisal (SA), which has been undertaken on the Submission Core Strategy Report, to ensure the new plan is as sustainable as possible.

### 1.1 THE PURPOSE AND STRUCTURE OF THIS REPORT

This SA Report presents the findings of the SA carried out on Tunbridge Wells Borough Council's Core Strategy Submission Report (Ref. 1). It follows the methodology and framework set out in the SA Scoping Report for Tunbridge Wells Borough Local Development Framework (LDF), issued for consultation in September 2005 and finalised in March 2006 (Ref. 2).

SA promotes sustainable development by identifying the likely sustainability effects of the proposed objectives and broad policy options for the Core Strategy, together with making recommendations for reducing, mitigating or compensating any significant adverse effects and maximising positive effects. The SA has applied the Strategic Environmental Assessment (SEA) requirements to ensure compliance with the SEA Regulations (Ref. 3) and meets the requirements of the former Office of the Deputy Prime Minister's (ODPM) requirement for SA of Development Plan Documents (DPD's) under the Planning and Compulsory Purchase Act (Ref. 4).

This SA report is structured as follows:

**Section 2** provides the background to the SA Report, including the requirements for SEA/SA, and the contents of the Core Strategy Submission Report;

**Section 3** outlines the SA methodology and the consultation process;

**Section 4** addresses the Sustainability Objectives, the baseline context or evidence base for the Core Strategy, key sustainability issues, the SA Framework used in the assessment of the Core Strategy Submission Report, and assesses the compatibility of the Core Strategy objectives against the SA Framework objectives;

**Section 5** addresses the reasonable alternative options, including the 'do-nothing' approach and the main core strategy options;

**Section 6** identifies where significant changes have been made to the Core Strategy since the Preferred Options Stage;

**Section 7** identifies how the SA has influenced plan development since the Preferred Options Stage;

**Section 8** presents the potential beneficial and adverse effects of the Core Strategy Submission Report, including cumulative, synergistic and secondary effects, mitigation measures, recommendations and uncertainties; and

**Section 9** discusses implementation, the next stages in the planning process and proposals for monitoring.

# SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

## 1.2 REQUIREMENTS OF THE SEA DIRECTIVE

Table 1 sets out the requirements of the SEA Directive and signposts relevant sections of the report where these requirements are fulfilled.

**Table 1: SEA Requirements and where these are addressed in this report**

Requirements	Where covered in SA Report
a) An outline of the contents, main objectives of the plan or programme, and relationships with other relevant plans and programmes.	Section 2.2
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 4.3, Section 5.2
c) The environmental characteristics of areas likely to be significantly affected.	Section 4
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 4
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 4.1
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative.	Section 8 Appendices B, C, D and E
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 8 Appendices B, C, D and E
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 5
i) A description of measures envisaged concerning monitoring in accordance with Article 10.	Section 9.3.3
j) A non-technical summary of the information provided under the above headings.	At front of Report

The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Requirements	Where covered in SA Report
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>• Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</li> <li>• Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).</li> <li>• Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</li> </ul>	Section 3.2
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</p>	Section 3.2
<p><b>Provision of information on the decision:</b></p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• The plan or programme as adopted;</li> <li>• A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>• The measures decided concerning monitoring (Art. 9 and 10)</li> </ul>	To be completed following adoption
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	To be completed following adoption
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive</p>	This table seeks to signpost sections of the report that fulfil the SEA Directive

## 2. BACKGROUND

### 2.1 NEED FOR SA/SEA

The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of new or revised planning documents including Development Plan Documents (DPDs). Under Section 39(2) of the Planning and Compulsory Purchase Act (2004) (Ref. 3), SA is mandatory for new or revised DPDs and other specified planning documents.

When preparing revisions of DPDs, Local Planning Authorities must also conduct an environmental assessment in accordance with the requirements of European Directive 2001/42/EC “*on the assessment of the effects of certain plans and programmes on the environment*” (the Strategic Environmental Assessment or ‘SEA Directive’), transposed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the ‘SEA Regulations’) (Ref. 4).

SEA and SA are very closely linked. The SA should fully comply with the requirements of the SEA Directive and the SEA Regulations, whilst also extending the assessment of environmental effects to incorporate economic and social aspects, as required for the Planning and Compulsory Purchase Act (2004) (Ref. 3). Although the requirement to carry out both an SEA and SA is mandatory, it is possible to satisfy the requirements of both pieces of legislation through a single appraisal process and this is the approach advocated by the former ODPM. From here on, the term SA is used to represent the combined SA/SEA process.

This SA has been undertaken in accordance with the core guidance document on the methodology or carrying out SAs: ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents’ published by the ODPM in November 2005 (Ref. 5).

### 2.2 THE CORE STRATEGY SUBMISSION REPORT

The Core Strategy is a key document that will set out the vision for Tunbridge Wells Borough until 2026, including objectives and strategic policies for achieving that vision. It forms the main document within the LDF, and all subsequent DPDs and SPDs must be in general conformity with this document. The Core Strategy will set the broad pattern of development for the location of new housing, employment, retail and community facilities whilst other documents will contain strategic policies on specific issues. For example, although the Core Strategy outlines the strategic locations of development, specific site allocations and more detailed development control policies will be included within subsequent DPD’s.

The Core Strategy Submission Report represents the current stage reached in developing the Core Strategy. The Document firstly sets out the Spatial Vision for the Borough (Chapter 3). Seven overarching Strategic Objectives are then set out in Chapter 3 of the Submission Report with the aim to ensure that the Spatial Vision for the Borough is realised.

The Delivery Strategy (which includes a Spatial Strategy and Settlement Hierarchy) then follows in Chapter 5 of the Submission Report and provides a directive plan of how the Spatial Vision and Strategic Objectives will be achieved in practical terms. It summarises how much development will happen where, when and by what means.

A series of Core Policies then detail the fundamental principles that should be adhered to in order to deliver development in accordance with the Delivery Strategy (Chapter 4). For the purposes of this sustainability appraisal, the Core Policies have been grouped into ‘General Policies’ (Core Policies 1-8) which cover general issues facing the Borough and ‘Place-Shaping Policies’ (Core Policies 9 – 15) which are responsible for maintaining or creating a sense of identity in different areas in the Borough.

The Objectives, Delivery Strategy and Core Policies have all undergone a Sustainability Appraisal, with results presented within this Sustainability Appraisal Report (refer to Section 8).

### 3. SUSTAINABILITY APPRAISAL METHODOLOGY

#### 3.1 OVERVIEW

The ODPM guidance (Ref. 5) provides detail on the process of implementing SA. Figure 1, overleaf, outlines the SA methodology and illustrates how SA fits into the DPD plan preparation process.

Stage A of the process involves the development of an appraisal framework to assess the sustainability of the LDF (referred to as the 'SA Framework'), the collection of baseline data, review of relevant plans and policies and identification of the key sustainability issues. This stage was undertaken by Waterman Environmental and the results were summarised in a Scoping Report (March, 2005) (Ref. 2).

Stage B of the process involves the development and refinement of broad strategic locations for development. This stage was undertaken by Waterman Environmental and the results were summarised in the Initial Sustainability Appraisal of the Tunbridge Wells Borough Local Development Framework Issues and Options Report, which was issued for consultation in February 2007. A further review of additional baseline information was undertaken as part of the Initial Sustainability Appraisal as various reports, strategies and specific pieces of research had been undertaken by TWBC (since the production of the Scoping Report) in order to establish the evidence base for the Core Strategy. The Initial Sustainability Appraisal Report also provided an update on the review of relevant plans, policies and programmes as a result of significant changes in national sustainability policies as well as changes in planning policy at a national and regional level.

Stage C of the process involves the development and sustainability appraisal of Core Strategy Preferred Options. Waterman Environmental undertook the sustainability appraisal of the Preferred Options, and the results were published in the Sustainability Appraisal Report of the Core Strategy Preferred Options (Ref. 3), which was issued for consultation (alongside the Preferred Options Report) in November 2007.

Stage D of the process involved public consultation of the Core Strategy Preferred Options Report and the accompanying Sustainability Appraisal Report.

The focus of this SA Report is on the second part of Stage D (2a), which involves appraising any significant changes that may occur to the Core Strategy policies as a result of public consultation. A further review of additional baseline information has also been undertaken and is updated in this Report in Section 4 to reflect the emergence of new baseline information to further inform the evidence base for the Core Strategy.

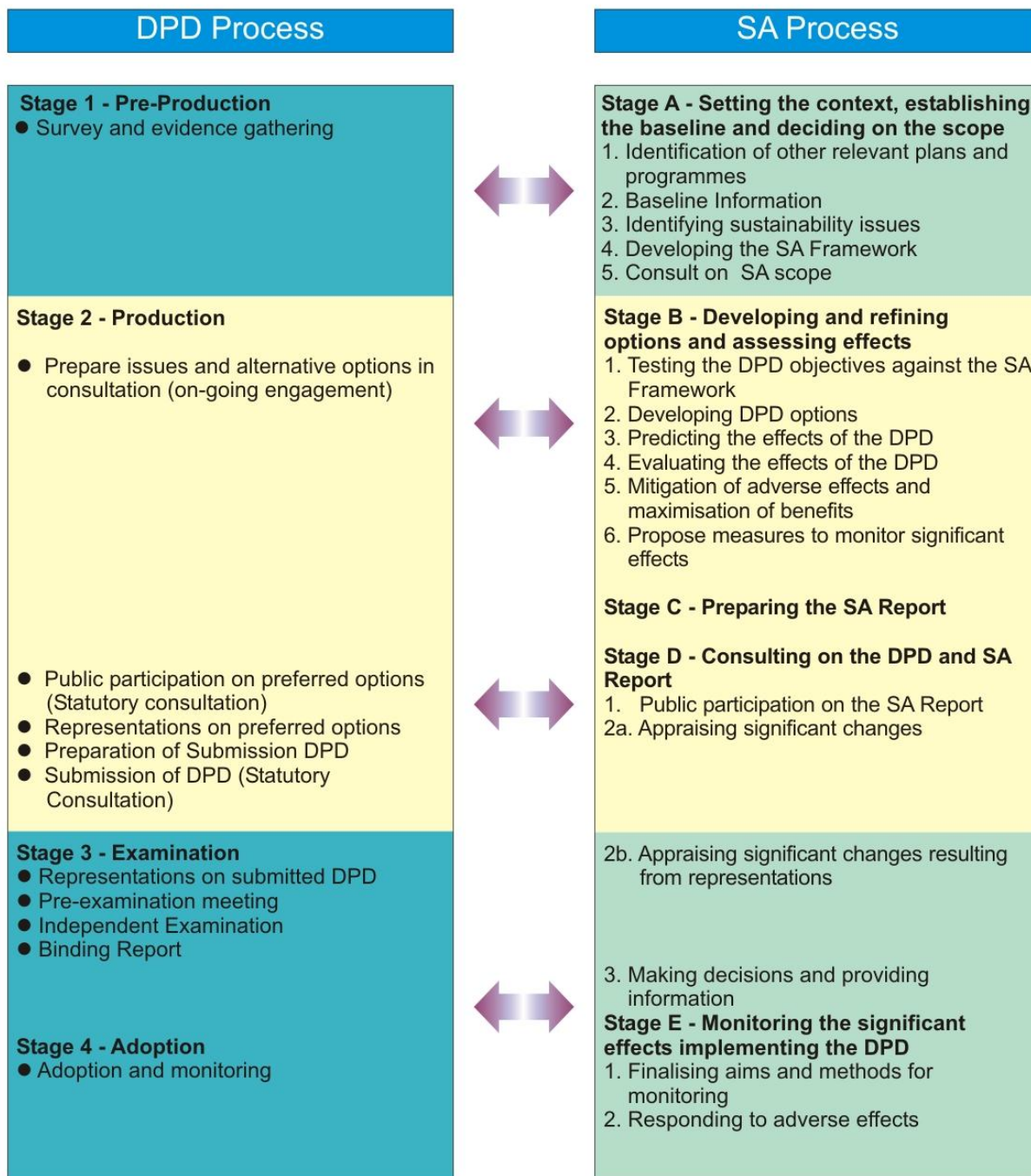


Figure 1: The DPD Preparation Process in Relation to the SA Process

### 3.2 CONSULTATION

#### Scoping Stage (Stage A)

In accordance with ODPM guidance, a copy of the SA Scoping Report (Ref. 2) was sent out to the following organisations:

- Statutory consultees
- Non-Statutory consultees
- Countryside Agency (now part of Natural England)
- South East England Regional Assembly
- English Heritage
- South East England Development Agency
- English Nature (now part of Natural England)
- Regional Health Authority
- Environment Agency
- South West Kent and Maidstone Weald Primary Care Trusts
- Kent County Council
- East Sussex County Council
- Parish and Town Councils within Tunbridge Wells Borough
- Neighbouring Local Planning Authorities (Ashford, Maidstone, Rother, Sevenoaks, Tonbridge and Malling, and Wealden)
- Royal Tunbridge Wells Town Forum

Comments on the SA Scoping Report were received from English Nature, the Environment Agency (Kent Area), and the Countryside Agency. Following consultation, a number of minor changes were made to the draft SA Framework. The revised SA Framework is contained within the Scoping Report which is available on the Tunbridge Wells Borough Council website ([www.tunbridgewells.gov.uk](http://www.tunbridgewells.gov.uk)). No respondent suggested altering the Sustainability Objectives. However, minor changes were made to a number of sub-objectives in light of comments received. In relation to the Core Strategy, the only relevant changes were the addition of the following sub-objectives:

- 8.7 *'Will development be designed so it is less likely to cause pollution?;*
- 8.8 *'Will it prevent inappropriate development in areas at risk of flooding?; and*
- 11.4 *'Will it significantly affect the quality of landscapes, in the countryside or in more urban settings?'*

As a result of consultation, the additional sub-objectives were included in the SA Framework.

Furthermore, the Council has already produced a number of Supplementary Planning Documents (SPDs). As part of the process of producing these SPDs an additional sub-objective was added:

- 6.5 *Will it ensure suitable access for people with disabilities?*

These additional sub-objectives were added to the SA Framework at Issues and Options stage, and have been included within all appraisal work since, including within this Sustainability Appraisal Report. The SA Framework is detailed within Section 4 of this Report.

#### Initial Sustainability Appraisal Stage (Stage B)

No comments were received on the Initial SA Report (Ref. 6) which was made available for consultation alongside the Tunbridge Wells Borough Local Development Framework (LDF) Core Strategy Issues and Options Report in February 2007. However, a summary of the comments raised in relation to sustainability issues are presented below:

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### *Renewable Energy*

- Encourage sustainable design by reducing use of unsustainable resources, increasing energy efficiency and improving targets which are currently low. Solar energy for water heating and electricity generation should be promoted. Financial incentives should be considered. Overall, the incorporation of renewable should not be at the expense of the projects viability or biodiversity and landscape assets.

### *Employment*

- Seek to maintain employment land within the borough where possible by restricting the conversion of such land to alternative uses. The need for small business units within the borough and rural areas in particular was raised. Concern was raised over the limited sustainable transport provision being a limitation to an increase in local employment.
- Farm diversification should be encouraged, but only to economic activity such as small and light industry which should be promoted in all parts of the Borough, and the Borough Council should do all it can to minimise agricultural decline.

### *Community Services*

- Support was given for the provision of key services in close proximity to residents to achieve sustainable communities and local employment within Villages, Neighbouring centres, Paddock Wood, Cranbrook and Hawkhurst reducing the need to travel. Within RTW and Southborough there was a recommendation that the loss of surgeries and libraries in particular should not be allowed. In general there is a need for existing facilities to be improved and for larger facilities within the town centre, such as a cinema and an ice skating rink.

### *Crime*

- Designing out crime has been identified as a way of reducing crime in the area. However it was felt that the root cause of crime is the concentration of certain types of housing, together with a lack of facilities for young people. The majority of respondents feel that more visible policing, better education and greater provision of local activities will help to reduce the opportunities for crime.

### *Transport*

- Overall it was felt that accessibility problems occurring as a result of traffic congestion and on-road parking and an over-reliance on private car use were the main transport related issues. These issues make access difficult for pedestrians and wheelchair users. Improvements are needed to existing cycle and pedestrian facilities both within town and village centres. Promotional events, such as a car-free city centre day, were also suggested. Improvements to transport interchanges were also highlight as necessary.
- Numerous measures were proposed to reduce the use of the car, the most viable were: car-free days, car-schedules, cycling/walking promotions backed up by extra bus services; improved quality, frequency and cost of public transport; flat fares for buses; better publicity; park and ride; hopper bus taking circular route; integrated price structure between transport providers; giving priority to buses and taxis; better school buses; trams.



### Housing

- There was general support for use of brownfield sites first and support for higher densities to avoid the need for greenfield land-take for housing. However, this must be subject to good quality design and layout and Conservation Area considerations. All housing should be provided with some form of private space such as a balcony or small amenity space or garden. As a general principle, it was suggested that new housing should be sustainably located so as to reduce the need to travel, especially by car. Affordable housing should be mixed on sites of all sizes to avoid large areas of one tenure type and at a minimum 30% should be provided.

### Preferred Options Stage (Stage C)

In accordance with ODPM guidance, a copy of the SA Report of the Core Strategy Preferred Options (Ref. 7) was put out to public consultation alongside the Core Strategy Preferred Options Report.

Comments on the SA Report of the Core Strategy Preferred Options were received from the South East England Development Agency (SEEDA), Campaign to Protect Rural England (CPRE) and the Cranbrook Conservation Area Advisory Committee (CCAAC). Comments received requested the inclusion of some additional economic objectives within the Sustainability Appraisal objectives, including objectives to:

- Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities; and
- Recognise the economic value of the rural economy and tourism sector in the Borough.

The SA Framework and objectives for the Core Strategy were consulted on and agreed as part of the SA Scoping Report (Ref. 2). Notwithstanding this, the importance and economic value of the tourism sector has been addressed throughout the appraisal process (including the Initial Sustainability Appraisal Stage through to this Submission Stage) through the following Sustainability Appraisal objectives and sub-objectives:

- SA Objective 6: *'To improve accessibility to all services and facilities, including ... cultural, leisure, recreation (CLR) facilities and a sustainable tourism sector'*;
- Sub Objective 6.1: *'Would it offer opportunities for participation in CLR activities by tourists and local people'*; and
- Sub-Objective 6.2: *'Would it provide support for CLR providers'*

In addition, the promotion of a knowledge-based economy has been inherently addressed during the SA process through the following SA Sustainability Appraisal objectives and sub-objectives:

- SA Objective 4: *'To raise educational achievement across the Borough and develop opportunities for everyone to acquire the lifetime skills needed to find and remain in work and support the long-term competitiveness of the Borough'*;
- Sub Objective 4.1: *'Would it increase opportunities for education/ training for everyone?'*; and
- Sub Objective 4.2: *'Would it increase opportunities to improve the level of basic skills and/ or information/ communication technology?'*

Furthermore, recognition of the economic value of the rural economy has been inherently addressed throughout the SA process through the following SA Sustainability Appraisal objectives and sub-objectives:

- SA Objective 16: *'To stimulate and sustain economic competitiveness across the Borough'*; and, in particular
- Sub-Objective 16.2: *'Would it sustain the vitality and viability of the village?'*

In consideration of the above, and the number of stages that have already been completed of the SA of the Core Strategy, no changes have been made to the SA Framework (as contained within the Scoping Report) which has been used during the Initial SA and Preferred Options SA stages.

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Apart from commendations regarding the quality of the SA accompanying the Core Strategy Preferred Options, and recommendations to make constructive amendments to the Core Strategy in light of particular findings of the SA, no other comments were received on the SA Report of the Preferred Options.

**4. SUSTAINABILITY OBJECTIVES, BASELINE DESCRIPTION AND CONTEXT**

**4.1 RELEVANT PLANS, PROGRAMMES AND STRATEGIES**

The Core Strategy is influenced by a number of other international, national and local plans and programmes, which were reviewed as part of the Scoping process. The full list of documents studied and the review of relevant plans, programmes and strategies are presented in the SA Scoping Report (Ref. 2), and the Initial Sustainability Report of the Issues and Options (Ref. 6).

A summary of the key issues identified for consideration in the preparation of the LDF resulting from the review of plans, programmes and strategies at that time are outlined in Table 2 below:

**Table 2: Key Issues for the LDF Preparation**

<b>Topic</b>	<b>Key issues to be considered in the LDF preparation</b>
<b>General</b>	Consider objectives and targets from the RSS, Integrated Regional Framework and the Regional SA when developing the LDF.
<b>Economy</b>	Enhance the local economy (consistently maintain unemployment below national and county rates until 2011). Promote tourism to increase prosperity and employment. Promote small businesses in rural locations. Promote vitality and viability of town and village centres. Retain a portfolio of employment sites/ premises to provide a range of employment opportunities.
<b>Social</b>	The LDF should make provision for an appropriate supply of housing. The LDF should seek to maximise housing density where appropriate. Maximise new dwellings to be developed on previously developed land. Provide housing, which meets the needs of the local population. Prioritise affordable / Key Worker housing. Ensure adequate provision of affordable housing in all new developments. Advocate the use of the SEEDA / BRE sustainability checklist for new housing. Enhance access to healthy lifestyle choices and to healthcare facilities. Create and sustain vibrant mixed communities, but also adapt to the needs of an ageing population. Provide sufficient local services to meet local needs. The LDF should provide policies, which promote a wide range of high quality and enjoyable leisure opportunities. Increase the provision of recreation areas and open space and ensure policy proposals take account of the impact of developments on all open public space. Reduce crime and the fear of crime.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Topic	Key issues to be considered in the LDF preparation
Environmental	<p>Ensure all reasonable opportunities are taken forward to encourage development, which is energy efficient.</p> <p>Prioritise policies that protect environmentally designated sites including SSSIs, Sites of Local Nature Conservation Interest, the AONB, and Conservation Areas in relation to renewable energy developments and encourage development of renewable energy facilities.</p> <p>Promote and improve safe, convenient and sustainable transport options to work, school, health and leisure facilities. In doing so, the LDF would be contributing to the air quality, human health, climate change and social inclusion objectives of its SA.</p> <p>Ensure that the LDF is co-ordinated with rural transport service plans.</p> <p>LDF should avoid unnecessary development in the floodplains that might decrease storage/increase runoff, and compromise human safety.</p> <p>Ensure that proposed development will avoid harm to biodiversity and geological conservation interests. These interests should be maintained, enhanced and restored in association with development.</p> <p>Protect and enhance key open spaces and designated sites. Increase opportunities for education regarding key open spaces and designated sites.</p> <p>Protect and enhance the high quality landscape of the Borough.</p> <p>Expand existing woodland or create new woodland areas.</p> <p>The LDF could influence the historic environment. Heritage issues should be taken into account when considering proposals affecting buildings of special architectural or historic interest, or their settings.</p> <p>Policies should be developed that require remediation of contaminated sites.</p> <p>Maximise use of previously developed land, whilst minimising loss of greenfield sites.</p> <p>Certain land uses and development might hinder accessibility to open country and common land. The LDF should consider these issues, which have relevance to SA objectives on human health, population, and severance.</p> <p>Improve air quality in locations where objectives have already been, or are likely to be exceeded in the future.</p>

The SA of the Issues and Options Report undertaken by Waterman (Ref. 7) updated this policy review, highlighting a number of new and emerging planning policy requirements and guidance. These included the following:

### 4.1.1 National Planning Policy and Guidance

- Planning Policy Statement (PPS) 1: Delivering Sustainable Development, and PPS: Planning and Climate Change, Supplement to PPS1 (Ref. 8);
- Planning Policy Statement (PPS) 3: Housing (Ref.9);
- PPS25: Development and Flood Risk (Ref. 10);
- Water Efficiency in New Buildings (Ref. 11).

### 4.1.2 Regional Planning Policy and Guidance

- The Kent and Medway Structure Plan (KMSP) (Ref. 12);
- Local Transport Plan (LTP) Kent 2006-11 (Ref. 13);
- Vision for Kent: Kent people in partnership for a better tomorrow (Ref. 14); and
- Planning For Minerals in Kent 2006 to 2021, The Minerals Core Strategy Development Plan. Document (Ref. 15);
- Kent Environmental Strategy Progress Report (Ref. 16); and
- West Kent Area Investment Framework (Ref. 17).

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

A number of additional or updated relevant legislation and planning documents have also been published by the Department of Communities and Local Government (DCLG) since the SA Issues and Options Report was undertaken. These include:

- Building a Greener Future: Policy Statement (Ref. 18);
- Planning for a Sustainable Future: White Paper (Ref. 19); and
- Code for Sustainable Homes (Ref. 20).

### **Building a Greener Future: Policy Statement, 2006**

This policy statement responds to the key issues raised in responses to the consultation paper 'Building a Greener Future: Towards Zero Carbon Development' which set out proposals to progressively to improve the energy/carbon performance set in Building Regulations to achieve zero carbon housing within ten years. The policy statement confirms the Government's intention for all new homes to be zero carbon by 2016. The regulations will be progressively tightened with a 25 percent increase in 2010 and 44 percent increase in 2013 to reach zero carbon in 2016. Tax relief incentives will be implemented with effect from 1 October 2007 for new homes built to a zero carbon standard. The policy statement also reports on positive responses in relation to proposals to make the Code for Sustainable Homes a mandatory requirement. Further consultation is awaited to define the specifics of how a mandatory rating against the Code will work building on the use of Energy Performance Certificates.

### **Planning for a Sustainable Future: White Paper, 2007**

The White Paper has been prepared in response to Kate Barker's recommendations for improving the speed, responsiveness and efficiency in land use planning, and taking forward Kate Barker's and Rod Eddington's proposals for reform of major infrastructure planning. The Paper sets out proposals for reforms in the planning system in relation to decisions on nationally significant infrastructure projects - including energy, waste, waste-water and transport. The proposals are to replace the multiple existing consent regimes with a new system, making the system more efficient and responsive given the challenges economic globalisation and climate change.

### **Code for Sustainable Homes, 2007**

The Code was introduced on 10<sup>th</sup> April 2007 to replace EcoHomes in England. It is a new national standard to improve the overall sustainability of newly built homes. The Code aims to support the Government's overall aim of achieving zero carbon housing by 2016, as well as achieving a 25% improvement in the energy/carbon performance set in Building Regulations in 2010; increasing to a 44% improvement in 2013. The Code is based on EcoHomes and was developed by the DCLG, working closely with the Building Research Establishment (BRE). The Code is a set of sustainable design principles covering performance in nine key areas, namely; Energy and CO<sub>2</sub> Emissions; Water; Materials; Surface Water Run-off; Waste; Pollution; Health and Wellbeing; Management; and Ecology. In each of these categories, performance targets are proposed which are in excess of the minimum needed to satisfy Building Regulations, but are considered to be sound best practice, technically feasible, and within the capability of the building industry to supply. The Code sets minimum standards for energy and water efficiency above the minimum mandatory requirements in Building Regulations and complements the system of Energy Performance Certificates, introduced in June 2007. The Code also sets standards for other categories including waste and materials.

Since April 2008, the Government will require that all new homes should have a mandatory Code rating in line with Planning Policy Statement: Planning and Climate Change, Supplement to PPS 1.

## **4.2 EVIDENCE BASE FOR THE CORE STRATEGY**

Key sustainability issues for Tunbridge Wells Borough were identified in the SA Scoping Report, consulted on in September 2005 (Ref. 2). However, where necessary, additional studies have been undertaken to provide a more detailed evidence base to inform the preparation of the Core Strategy and the subsequent Sustainability Appraisal. These are summarised in the following sections.

### 4.2.1 Tunbridge Wells Core Strategy: Submission Stage, Habitats Regulations Assessment – Appropriate Assessment, 2009

A pre-screening report was prepared by Scott Wilson in 2007, which provided an initial Habitat Regulations Assessment (HRA) of the potential effects of TWBC's Core Strategy on the Natura 2000 network i.e. Special Areas of Conservation (SACs), and Special Protection Areas (SPAs). A full HRA was undertaken in 2009 in order to inform the Submission Core Strategy. Of the European sites taken forward from screening into the Appropriate Assessment, it was concluded that no adverse effects would result upon two (Dungeness SAC/Dungeness to Pett Level SPA and Hastings Cliffs SAC) due to a combination of the physical distance of the main population centres of Tunbridge Wells borough and the fact that both sites already have management schemes in place that are considered sufficient to control recreational pressure.

However, the HRA concluded that adverse effects upon Ashdown Forest SAC/SPA as a result of increased recreational pressure from the 6,000 homes to be delivered in Tunbridge Wells borough could not be ruled out when considered in combination with the more than 90,000 homes to be delivered elsewhere in the Ashdown Forest recreational catchment over the lifetime of the Core Strategy. This was due to the fact that although Tunbridge Wells has a very high ratio of accessible natural greenspace to population (and therefore provides considerable alternative recreational resources considerably closer to the main population centres than Ashdown Forest) the intrinsic and historic appeal of the SAC/SPA is such that a proportion of new residents will always be likely to be drawn to this site for itself.

Given that much of this potential effect will be outside the direct control of TWBC, the HRA recommended that TWBC monitor progress with the ongoing assessment and recreational management studies being undertaken on the SAC/SPA by Wealden District Council and be prepared to participate in any collaborative cross-authority management plan or associated scheme that ultimately derives from these studies. Any measures derived from these studies which would need to be applied by TWBC would need to be incorporated into future DPDs or SPDs.

The HRA also identified that if the increase in population as a result of the delivery of 6,000 new homes within the district was likely to reduce the ratio of accessible natural greenspace to population then new areas of accessible greenspace would need to be identified and delivered at a minimum rate of 1ha/1000 new population (this being Natural England's Accessible Natural Greenspace Standard).

The HRA concluded that provided the aforementioned recommendations concerning Ashdown Forest SAC/SPA are implemented, TWBC would be seen to be taking all measures possible at this tier of planning to ensure that the development to be delivered under the Core Strategy would not have a significant adverse effect upon nearby European Sites.

### 4.2.2 Accession Mapping Study, 2007

An Accession Mapping Study was undertaken to identify accessibility levels to key destinations across the Borough, taking into consideration public transport accessibility and the proximity of key services and facilities, such as Neighbourhood and Village Centres, Retail Areas, Schools, Hospitals and GPs. This Study highlighted poor public transport accessibility between villages and rural towns in the Borough, with the greatest accessibility within the main urban areas of Royal Tunbridge Wells and Southborough and villages in close proximity such as Pembury and Langton Green.

### 4.2.3 Strategic Flood Risk Assessment, 2007

A Strategic Flood Risk Assessment (SFRA) has been undertaken by Scott Wilson to help inform the land use planning process to reduce the vulnerability of development to flooding. In accordance with the requirements of PPS 25, the SFRA presents information to enable TWBC to apply the 'sequential test' to potential development sites guiding development to areas of low flood risk. Where development sites cannot be located in accordance with the sequential test, the SFRA should provide sufficient information to demonstrate that development will be safe from the risks of flooding for the lifetime of the development.

The report presents mapping and information to guide TWBC in undertaking the 'sequential test' for new development. The report sets out clear policy recommendations which are set out the preferred approach to considering sites with respect to flood risk.

The report provides additional area specific recommendation. In particular, parts of Paddock Wood and Five Oak Green have a rapid response to rainfall but currently do not benefit from the Environment Agency's Flood Warning Service which should be considered in undertaking the 'sequential test'. In addition, planning applications for developments around the areas of Paddock Wood, Five Oak Green and Cranbrook should submit a Flood Risk Assessment (FRA) that considers flooding from the sewer system and the consequences of a failure of the drainage system through blockage in addition to river flooding. For the areas around Paddock Wood, Five Oak Green, Frittenden and Lamberhurst where flooding as a result of overland flow has been experienced, planning applications should submit a FRA that considers the risk of overland flow to and from the development and Sustainable Urban Drainage Systems (SuDS) that may be used to mitigate this risk. It should also consider building layouts so as not to exacerbate risk of flooding from overland flow.

The SFRA report also details policy recommendations for the Council such as seek out opportunities to have infrastructure such as bridges, culverts, drainage systems investigated and upgraded if necessary, safeguard floodplains from development or provide compensatory storage on level for level basis and seek opportunities to restore natural river forms and floodplains as areas of biodiversity and increasing their amenity value.

The SFRA recommends that all developments located within a flood risk area have a Flood Emergency Plan and when the new development is marketed, a flood pack is given to all viewing the property.

Evidence collected in the preparation of the SFRA Report suggests that flood risk in specific areas has been exacerbated by developments taking place within the natural floodplains of watercourses. Five Oak Green is located in the floodplain of the River Medway and Alder Stream therefore any future development around this area must not increase the risk to the existing development. Increased pressure on the drainage system has also contributed to flooding in Paddock Wood from fluvial sources and a result of an inadequate drainage. The SFRA therefore recommendation that TBWC to:

*'Adopt policies that will ensure that any new developments have a drainage system that will accommodate the stormwater that development generates. If these developments are being linked to older systems the Council should ensure that the original systems are designed and maintained to an appropriate standard or provide strategic options to reduce pressure on the sewer system'.*

The SFRA Report highlights the need to consider the design of effective SUDS solutions on development sites. Recommendations made, require drainage design and sustainable drainage design to consider the impacts of climate change for the lifetime of the development at the site and downstream ensuring discharge rates do not increase and are preferably restricted to greenfield runoff rates. The SUDS should maximise opportunities for biodiversity, amenity value, water quality and resource value of a development and/or surrounding area. Reference is also made to the inclusion of water efficiency measures, such as greywater recycling, rainwater harvesting and water use minimisation technologies in new developments to help limit the consequences of flooding and water resource shortages.

Specifically, in order to mitigate flooding as a result of the insufficient capacity in the existing drainage infrastructure and/or the speed at which storm water is delivered to the Mid Drain in Paddock Wood, it is recommended that the Council:

*'Ensure all proposed developments in this area restrict their discharge rates to less than that currently contributed to the sewer system and that this reduction should be achieved through the use of SUDS'.*

Finally, the Council should be satisfied that the proposed developments can be accommodated by the existing resource provision in the area and seek developments to restore watercourses, integrating them into their design and incorporating a management plan for their continued maintenance to secure their long-term biodiversity and amenity value.

#### 4.2.4 Strategic Housing Market Assessment, 2008

In accordance with the Communities and Local Government (CLG) Strategic Housing Market Assessments: Practice Guidance (Ref. 22), a Strategic Housing Market Assessment (SHMA) (Ref. 23) was to undertaken for the following West Kent authorities to ensure a comprehensive and robust assessment:

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

- Tunbridge Wells Borough Council;
- Sevenoaks District Council; and
- Tonbridge and Malling Borough Council.

### *Nature and Level of Current Housing Market and Demand*

The SHMA identified a high level of self-containment of household moves within each Local Authority, with 68.6% of migration contained within Tunbridge Wells, and any cross boundary movement principally to adjoining Local Authorities. In migration from Greater London to Tunbridge Wells at 11.8%, nonetheless represents a lower proportion when compared to Sevenoaks District Council and Tonbridge and Malling Borough Council. The SHMA reports that TWBC comprises a lower proportion of total social housing stock (15.8%) than the national average (19.3%). In addition, the level of owner occupation is higher (70.8%) than the national average (68.1%).

With regards to housing type, TWBC comprises a higher proportion of flats (21.2%) and lower levels of terraced properties (18.7%) when compared to the other West Kent authorities and at county level, regionally and nationally.

The SHMA identifies that affordability of properties within TWBC remains an issue, with a 34.1% price increase between 2003 and 2008. Notwithstanding this, it is important to note that after a long period of economic growth and low levels of unemployment, the SHMA was conducted during a period of major economic uncertainty; particularly in the finance and housing markets. A financial crisis in mortgage markets has led to a significant fall in the availability of mortgages; the SHMA reports that this fall represents the fastest fall in house sales and new development for over 60 years. As a result of the 2008/09 financial crisis, West Kent is expected to experience an increased demand for private rented accommodation, intermediate housing initiatives and ultimately social-rented properties. Estimates that it will take approximately two years for the local economy to recover, which will, in the short-term, also result in adverse impacts on housing delivery.

### *Likely Characteristics of Future Housing Markets*

The SHMA estimates that TWBC will experience a 2.9% increase in population (9,600 people) between 2006 and 2026. A key feature of this growth is predicted to be an increase in the population of those aged between 65 and 84 years of age and 85 years and over. Indeed, by 2026, the 65 years and over age group is predicted to comprise 24.5% of the West Kent population. This will have significant implications for housing, health, social care policy and provision.

### *Future Demand for Housing*

TWBC is required to plan for a full range of types and sizes of market housing to meet the needs of the whole community, including family, single person and multi-person households. The SHMA reports that, after allowing for the turnover of existing stock, TWBC is predicted to experience a net annual shortfall of 290 houses, and a need of 728 affordable houses per annum.

### *Key Recommendations*

In light of the findings of the SHMA, the SHMA identifies the following key recommendations:

- Ensure that future new development provides a mix of housing type and size to meet the needs of all households;
- Focus new delivery in market housing to address the stock imbalance, and the impact of future demographic and household formation change;
- Consider setting affordable housing targets of at least 40% of all suitable sites;
- The affordable tenure mix targets for TWBC should be 60% socially rented and 40% intermediate housing;
- Consider affordable housing property size targets of 35% one bedroom and 30% two bedroom units, principally flats and terraced houses to meet the needs of single, couple and small family households and 35% three and four bedroom houses to address the needs of larger families;

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

- Meeting the affordable accommodation requirements of families or those with priority needs should be as important as the larger scale requirements of small units for single or couple households;
- Consider adopting the following site thresholds for affordable housing:
  - Main Towns: 10+ dwellings or 0.3ha;
  - Local Service Centre Settlements: 5+ dwellings or 0.2ha; and
  - Smaller Villages: 50% affordable housing provision for 2+ dwellings or 0.1ha.
- Consider market housing property size targets delivery of a 20% level applied to one bed, 30% to two bed, 35% to three bed units and 15% for four plus bedrooms;
- Develop housing strategies to make the best use of existing housing stock; and
- Address the current and future growth in older people and frail older households across all tenures, and their related care and support needs.

**4.2.5 Strategic Housing Land Availability Assessment**

In 2008/2009 TWBC undertook a Strategic Housing Land Availability Assessment (SHLAA) (Ref. 24) of the Borough in order to meet the requirements of PPS3: Housing.

The purpose of the assessment was to ensure that there is an adequate deliverable housing land supply to meet the emerging South East Plan strategic requirements to 2026. It identified sufficient sites with housing potential to ensure that, through the plan-making process, all necessary development may be delivered in appropriate and sustainable locations.

Results of the SHLAA are summarised in Table 3 below, which identifies the amount of new housing identified for settlements in the Borough and the proportion that will be able to be delivered on previously developed sites up to 2015.

The SHLAA therefore shows that there is a sufficient supply of land with housing potential to accommodate a net additional 6,000 dwellings (2006 - 2026) to meet the draft South East Plan Panel Report August 2007 targets. The housing trajectory identifies sufficient specific sites to deliver housing in the first five years, and a further supply of developable sites for years 6-10 and years 11-15.

**Table 3: Table 3: Results of the SHLAA**

Settlement	Distribution of the Borough’s total housing requirement	Approximate % that can be delivered on Previously Developed Land (PDL)
Royal Tunbridge Wells and Southborough	75%	69%
Paddock Wood	10%	10%
Cranbrook	5%	76%
Hawkhurst	4%	37%
The Villages	3%	Varies between 38-100%
The Rural Area	3%	48%

It should be noted that it is envisaged that there will be a procedure that allows for annual updating or reassessment of the SHLAA. It is therefore anticipated that more PDL sites will be identified, or become available, during the lifetime of the Core Strategy.



**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

**4.2.6 Landscape Character Assessment and Capacity Study, 2009**

Building on the existing Landscape Character Area Assessment, the Tunbridge Wells Landscape Character Assessment and Capacity Study (Ref. 25) examined the quality, value and sensitivity of landscapes within TWBC, whilst also identifying capacity for change in the landscape around main settlements, and the scope for mitigation of potential future development.

The assessment identified the possibility for future expansion around some areas of the main settlements of Tunbridge Wells, Paddock Wood, Cranbrook and Hawkhurst, provided that the site-specific mitigation measures identified as part of the assessment are incorporated as part of new development layout and design. The findings of the Assessment are to be used as evidence in the development of the Site Specific Allocations DPD and will be used to guide future allocation and inform development.

**4.3 SUMMARY OF KEY SUSTAINABILITY ISSUES FOR THE CORE STRATEGY**

The updated baseline information and evidence base for the Borough indicates that the key challenges which need to be addressed for the Core Strategy are: the capacity of PDL to absorb the development and housing needs of the Borough, the associated landscape and biodiversity issues with development on greenfield land, and mitigating flooding risk and delivery of sustainable transport infrastructure.

Pressures for housing growth threaten a number of environmental issues including a high number of sensitive ecological areas and landscapes, the Borough’s distinctive cultural heritage, potential to increase the risk of flooding, air quality issues associated with poor public transport provision in rural areas and rising car ownership, as well as ecological impacts of increased water abstraction to meet increased demands. Due to limited land availability, it is crucial that these environmental constraints are carefully considered to ensure any growth is accommodated in the most sustainable way and any opportunities for environmental enhancement are secured.

**4.4 THE SA FRAMEWORK FOR THE CORE STRATEGY**

The SA Framework for the Core Strategy, which was consulted on and agreed as part of the SA Scoping Report (Ref. 2) is set out below.

**Table 4: The SA Framework for the Core Strategy**

<b>Sustainability Objective</b>	
<b>Objective 1</b>	To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.
<b>Objective 2</b>	To improve the health and wellbeing of the population and reduce inequalities in health.
<b>Objective 3</b>	To reduce poverty and social exclusion.
<b>Objective 4</b>	To raise educational achievement across the Borough and develop the opportunities for everyone to acquire the lifetime skills needed to find and remain in work and support the long-term competitiveness of the Borough.
<b>Objective 5</b>	To reduce crime and the fear of crime.
<b>Objective 6</b>	To improve accessibility to all services and facilities, including employment, education, health services, shopping, green space, culture, leisure, recreation (CLR) facilities and a sustainable tourism sector.
<b>Objective 7</b>	To improve efficiency in land use through the reuse of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.
<b>Objective 8</b>	To reduce pollution (to land, air and soil) and maintain and improve the water quality of the Borough’s rivers, and to achieve sustainable water resources management.
<b>Objective 9</b>	To address the causes of climate change through reducing emissions of greenhouse gases.
<b>Objective 10</b>	To conserve and enhance the Borough’s biodiversity.
<b>Objective 11</b>	To protect, enhance and make accessible for enjoyment, the Borough’s countryside and historic environment.

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

**Sustainability Objective**

<b>Objective 12</b>	To improve travel choice and to reduce the need for travel, particularly by car to reduce road congestion.
<b>Objective 13</b>	To reduce the impact of resource consumption by using sustainably produced and local products and reducing waste generation and disposal.
<b>Objective 14</b>	To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough.
<b>Objective 15</b>	To ensure high and stable levels of employment so everyone can benefit from the economic growth of the Borough.
<b>Objective 16</b>	To stimulate and sustain economic growth and competitiveness across the Borough.

**4.5 TESTING THE PLAN OBJECTIVES**

As it is important that the Core Strategy Objectives are in line with sustainability principles, a compatibility test of the Core Strategy objectives has been undertaken against the SA Framework. The Compatibility Test presented in this Submission SA Report has been based on the Compatibility Test presented in the SA Report of the Preferred Options, with an updated appraisal where necessary to reflect any significant changes to the objectives. Table 5 below shows how the Core Strategy Objectives at the Preferred Options stage relate to those in the Submission Report, and where significant changes arise (highlighted in ‘bold’ text).

**Table 5: Core Strategy Objective changes from Preferred Options to Submission**

<b>Preferred Options</b>	<b>Commentary on Changes and Additional Evidence Base</b>	<b>Submission Report 2009</b>
<i>Strategic Objectives</i>		
1. To provide an adequate and continuous supply of land, in sustainable locations, to meet the Borough’s strategic requirements for housing, employment and retail development and for other supporting infrastructure, whilst protecting and seeking to enhance the Borough’s unique high-quality built and natural environment.	No change, further appraisal not required. However, a review of appraisal is required in light of new evidence base (Strategic Housing Market Assessment, Strategic Housing Land Availability Assessment and Landscape Character Study).	1. To provide an adequate and continuous supply of land, in sustainable locations, to provide a mix of uses and meet the Borough’s local and strategic requirements for housing, employment and retail development and for other supporting infrastructure, while protecting and seeking to enhance the Borough’s unique high-quality built and natural environment.
2. To maintain the general extent of the Metropolitan Green Belt.	This objective has been removed. Partly addressed by the Core Strategy strategic Sustainable Development Objective 1 (see below) and Core Policy 1, Delivery of Development and Core Policy 2 Green Belt (see Table 6).	
3. To provide, or to enable the provision of, enhanced infrastructure to support new and existing development, particularly where this can reduce the need to travel and encourage the use of sustainable modes of transport where travel remains necessary.	No change, further appraisal not required.	4. To facilitate the provision of enhanced infrastructure to support new and existing development, particularly where this can reduce the need to travel and to encourage the use of sustainable modes of transport where travel remains necessary.

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Preferred Options	Commentary on Changes and Additional Evidence Base	Submission Report 2009
<p>4. To provide sufficient affordable housing and a housing mix that meets the needs of local people.</p>	<p>More detail and new concepts included within this policy, SA of revised policy undertaken.</p>	<p>5. To provide high quality housing to meet the needs of all sectors of the community, both current and in the future, including with affordable housing, retirement accommodation, homes for young and elderly people and for those with special needs.</p> <p>7. To promote a safe and health community that is inclusive of the needs of the communities that make up the Borough’s population.</p>
<p>5. To stimulate and sustain the economic growth and competitiveness of Royal Tunbridge Wells as a Regional Hub in a way that also provides business opportunities for local people. Focusing development at the Hub should not prejudice the need to support the rural economy by protecting and enhancing the vitality and viability of the small rural towns, neighbourhood and village centres and wider rural area</p>	<p>No change, no further appraisal required.</p>	<p>2. To stimulate and sustain the economic growth and competitiveness of Royal Tunbridge Wells as a Regional Hub in a way that also provides business opportunities for local people. Focusing development at the Regional Hub should not prejudice the need to support the rural economy by protecting and enhancing the vitality and viability of small rural towns, neighbourhood and village centres and wider rural area.</p>
<p>6. To target regeneration efforts where necessary to ensure that all current and future residents of the Borough have the opportunity to access the services and facilities they require to meet their needs for housing, employment, leisure, education and health.</p>	<p>No change, no further appraisal required.</p>	<p>3. To target regeneration efforts where necessary to ensure that all current and future residents of the Borough have the opportunity to access the services and facilities they require to meet their needs for housing, employment, leisure, education and health.</p>
<p><b>New Sustainable Development Objective included. SA of new objective undertaken.</b></p>	<p><b>New objective. SA of new objective undertaken.</b></p>	<p>6. To ensure the provision of open space, sports, play, recreational, community and cultural facilities that are accessible to all.</p>

*Sustainable Development Objectives*

<p><b>New Sustainable Development Objective included. SA of new objective undertaken.</b></p>	<p><b>New Sustainable Development Objective included. SA of new objective undertaken.</b></p>	<p>1 To ensure that development takes account of the role and value of biodiversity and geodiversity and aims to protect and enhance locally important habitats, wildlife and geology.</p>
<p>1. To maximise the use of previously developed land and the existing property stock</p>	<p>No change, further appraisal not required.</p>	<p>2. To maximise the use of previously developed land and existing property stock.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Preferred Options	Commentary on Changes and Additional Evidence Base	Submission Report 2009
2. To conserve, wherever possible, finite non-renewable resources, including land, energy, water, soil and air quality	No change, further appraisal not required.	3. To conserve, wherever possible, finite non-renewable resources, including land, energy, water, soil and air quality.
<b>3. To ensure development addresses sustainability issues, including climate change adaptation and mitigation issues</b>	<b>Wording of the objective has changed, therefore further SA of submission draft policy undertaken.</b>	<b>4. To ensure development has regard to the potential impacts of climate change and to its long-term implications.</b>
4. To ensure development gives full consideration to design principles, including energy efficiency and sustainable construction.	No change, further appraisal not required.	5. To ensure development gives full consideration to good design principles, including energy efficiency and sustainable construction.

The detailed assessment results of the updated Compatibility Test are presented in Appendix A, a summary of which is presented below.

Overall, the appraisal indicates that the Core Strategy Strategic Objectives are broadly sustainable. The appraisal highlights that the most potential conflicts or uncertainties lie with Core Strategy Objectives (CSO) 3, 6, 8 and CS Sustainability Objective 2.

The provision or enhancement of infrastructure to support new development (CSO 8) could result in adverse effects on a number of SA Objectives depending on the type and level of infrastructure required and whether it can be accommodated on previously developed land, thus protecting environmental resources. There is a limit to Previously Developed Land (PDL) availability in the Borough and sensitive planning will be needed to limit the negative effects arising from the potential loss of greenfield land. Notwithstanding this, it should be noted that Core Policy 1: Delivery of Development endeavours to address these issues.

Similarly, the delivery of housing (CSO 3) could potentially result in adverse effects due to the number of sensitive constraints present within the Borough. Impact will depend on the location of development, the type of housing to be provided and other variables.

Regeneration of the Borough (CSO 6) involves ensuring access to housing, infrastructure, employment, education, health and leisure facilities and consequently the effects of the regeneration objective will be similar to those for infrastructure and housing as described above.

Finally, maximising the use of PDL (CS Sustainability Objective 2) may have adverse effects for biodiversity (where these sites support diverse habitats), heritage in urban areas, and the delivery of affordable housing (due to limited PDL availability).

### 5. ASSESSING OPTIONS AND ALTERNATIVES

#### 5.1 APPRAISING THE EFFECTS OF ALTERNATIVES

##### SEA Directive:

The Environmental Report should consider 'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' and give 'an outline of the reasons for selecting the alternatives dealt with' (Article 5.1 and Annex 1).

#### 5.2 BUSINESS AS USUAL SCENARIO

The business as usual scenario considered the sustainability implications of there being no new or amended policy, i.e. the effects of the current plan in the long-term.

The current Local Plan adopted in March 2006 (Ref. 26) covers a period up to 2011. This Local Plan was subject to a sustainability appraisal (although it is noted that the methodology applied at that time differs from that used within this Appraisal and which is now advocated by government guidance). The key issues arising from the appraisal of the Local Plan are discussed below.

The Local Plan generally has positive effects, by:

- Restricting development in the countryside during the Plan period;
- Restricting urban sprawl and seeking to encourage development within established settlements and focus large scale development within the existing Primary Shopping Areas thereby reducing journey times;
- Requiring design that preserves or enhances the character or appearance of a conservation area;
- Requiring development proposals to respect all aspects of site context and character; and
- Resisting development of greenfield sites and protecting green, open spaces including those that may have limited habitat value.

However, some uncertain or adverse effects have been identified in relation to increased overall emissions from additional building stock/development and site allocations in some locations may increase the need to travel. Some allocations for economic development include sites within the identified floodplain and the possibility of greenfield land-take is also identified.

Given that the Local Plan did not consider additional baseline information which has since been undertaken to better understand local needs and issues, and that the Sustainability Appraisal methodology used considered a more limited range of issues and topics relevant to long-term sustainability of communities and is not in compliance with current legislation and guidance, the Local Plan is unlikely to deliver sustainable development in the Borough.

In contrast, the planning and sustainability appraisal process undertaken in preparing the emerging Core Strategy will both contribute to ensuring the sustainability of spatial policies for the Borough, and improve on the existing situation.

#### 5.3 APPRAISAL OF OPTIONS AND ALTERNATIVES

The Initial Sustainability Appraisal of the Tunbridge Wells Borough Issues and Options Report (Ref. 6) tested the following main Core Strategy options:

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

- Main spatial options or alternatives for the Borough up to 2026 (set out as Spatial Options 1 to 4 in the Issues and Options Report); and
- Policy options to address the following six key themes for the Core Strategy – Environment, Economy, Leisure, Crime, Transport and Housing.

Table 6 below identifies, in the first column, all the issues and options appraised as part of the Initial Sustainability Appraisal of the Issues and Options Report consulted on in February 2007 (Ref. 6), and in the second column is a summary of how they have been dealt with within the Core Strategy Preferred Options Report (Ref. 7).

**Table 6: List of options and alternatives considered for the Core Strategy DPD**

<b>Issues and Options (Issues and Options Report (Ref. 6))</b>		<b>Preferred Options (Preferred Options Report (Ref. 7))</b>
Spatial Strategy Option 1	Concentrate development at the main areas of Royal Tunbridge Wells and Southborough	Selected to be included within: <ul style="list-style-type: none"> <li>• Spatial Strategy</li> <li>• Core Policy 1</li> </ul>
Spatial Strategy Option 2	Concentrate development at the urban areas of Royal Tunbridge Wells and Southborough, modest development at Paddock Wood, Cranbrook and Hawkhurst	Selected to be included within: <ul style="list-style-type: none"> <li>• Spatial Strategy</li> <li>• Core Policies 1, 2, 4</li> </ul>
Spatial Strategy Option 3	Disperse development throughout the Borough's settlements	Not selected
Spatial Strategy Option 4	New expanded town	Not selected
Environment 1	Increasing the amount of renewable energy supplied to: (a) new housing developments, (b) new commercial developments	Selected to be included within: <ul style="list-style-type: none"> <li>• Core Policy 10</li> </ul>
Environment 2	Use of small micro-renewable energy technologies to increase the proportion of renewable energy supplied to domestic properties	To be addressed through the DC Policies DPD
Environment 3	Should private developers contribute financially towards renewable and sustainable energy schemes at the Borough level, such as a wind farm?	To be addressed through the DC Policies DPD
Economy 1	Continue to allow commercial sites, which generate local jobs, to be converted to, or redeveloped for housing in Royal Tunbridge Wells/ Southborough, Paddock Wood, Cranbrook and Hawkhurst	Partly addressed through: <ul style="list-style-type: none"> <li>• Core Policy 9</li> </ul>
Economy 2	Potential to increase the following types of business and commercial premises: <ul style="list-style-type: none"> <li>(a) Small office units for less than 10 employees ...</li> <li>(e) ... Storage and distribution units e.g. home storage facility</li> </ul>	Selected to be included within: <ul style="list-style-type: none"> <li>• Core Policy 1</li> <li>• Core Policy 2</li> <li>• Core Policy 9</li> </ul>
Economy 3	Attract more shoppers to Royal Tunbridge Wells town centre in the face of increasing competition from neighbouring town centres	Selected to be included within: <ul style="list-style-type: none"> <li>• Core Policy 8</li> </ul>
Economy 4	Provide a greater range and number of job opportunities in the following towns: (a) Paddock Wood, (b) Cranbrook, (c) Hawkhurst	Selected to be included within: <ul style="list-style-type: none"> <li>• Core Policy 2</li> <li>• Core Policy 4</li> </ul>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Issues and Options (Issues and Options Report (Ref. 6))		Preferred Options (Preferred Options Report (Ref. 7))
Economy 5	Supporting the provision of key services such as Post Offices, shops, doctor surgeries and libraries	Selected to be included within: <ul style="list-style-type: none"> <li>Place-Shaping Policies</li> <li>Core Policy 8</li> </ul>
Economy 6	Allowing farmers to convert surplus agricultural buildings for commercial use	Selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 3</li> </ul>
Economy 7	Attract more tourists to visit the Borough	Selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 6</li> <li>Core Policy 8</li> </ul>
Leisure 1	Allow additional leisure facilities not currently provided for	Selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 8</li> </ul>
Leisure 2	Improving the quality of Council-owned recreation and leisure facilities in the Borough	To be addressed through the DC Policies and Site Allocations DPDs
Leisure 3	Improving the level of access to Council-owned recreation and leisure facilities in the Borough	To be addressed through the DC Policies and Site Allocations DPDs
Crime 1	Use appropriate design and other measures to reduce crime and the fear of crime	Selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 15</li> </ul>
Transport (a)	Addressing deficiencies in the frequency, coverage and quality of bus services and train services. Improving cycling facilities and footways. Improving interchanges between bus, rail, car and cycle facilities, pursue the provision of Park and Ride facilities and major highway improvements.	Partly addressed within: <ul style="list-style-type: none"> <li>Core Policy 10</li> </ul>
Transport (b)	Introducing congestion charging and significantly increasing car parking charges	Not selected
Housing 1	Providing new housing as far as possible on previously developed land	Selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 7</li> <li>Core Policy 11</li> </ul>
Housing 2	Preference for higher housing densities coupled with good quality design and layout over more extensive use of greenfield land and the countryside	Selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 7</li> </ul>
Housing 3	What type of open space should be provided in flats, small houses and larger houses?	To be addressed through the DC Policies and Site Allocations DPDs
Housing 4	All new housing developments to have a private car parking space even where communal or on-road spaces are available.	Not selected.
Housing 5	Options for affordable housing thresholds	Variable threshold option selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 7</li> </ul>
Housing 6	Options for when sites trigger the affordable housing threshold	Selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 7 (Partly)</li> </ul>
Housing 7	In addition to providing affordable housing on Rural Exception Sites, allocation similar sites for this purpose	Selected to be included within: <ul style="list-style-type: none"> <li>Core Policy 3</li> <li>Core Policy 5</li> <li>Core Policy 6</li> </ul>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

<b>Issues and Options (Issues and Options Report (Ref. 6))</b>		<b>Preferred Options (Preferred Options Report (Ref. 7))</b>
		<ul style="list-style-type: none"> <li>• Core Policy 7</li> <li>• Core Policy 4 (Partly)</li> </ul>
Housing 8	Options for meeting the identified need for small dwellings in the Borough	To be addressed through the DC Policies and Site Allocations DPDs
Housing 9	Options for meet the needs of gypsies and travellers	Selected to be included within: <ul style="list-style-type: none"> <li>• Core Policy 7</li> </ul>

The following sections summarise the appraisal of alternatives. This includes details on those identified detailed above which have not been selected for inclusion or are partly addressed within the Preferred Options, and will not be included within other Development Plan Documents.

**5.3.1 Spatial Option 3: Disperse development throughout the Borough’s settlements**

Dispersing development throughout the Borough’s settlements may restrict the ability to provide affordable homes, new services and facilities and also opportunities for renewable energy provision since development sites are likely to be smaller and therefore less likely to trigger policy requirements. With a more dispersed population, accessibility is likely to be reduced making residents more dependent on the car as a means of transport, therefore creating potential adverse effects on air quality and climate change.

Dispersing development may result in lower density development throughout the Borough, increasing the need for greenfield land take. This could have more significant effects on the Green Belt and sensitive natural and landscape designations. Pressure to release greenfield land is unlikely to promote the reuse of previously development land, which is focused in the main urban areas.

Following a review of consultation comments of the Issues and Options Report and results of the Initial Sustainability Appraisal, sustainability appraisal results for Spatial Option 3 were refined for the Preferred Options Stage, particularly in respect of rural villages in the Borough. Results of the revised Sustainability Appraisal can be found in the Initial Sustainability Appraisal Briefing Note: Appraisal of spatial options for additional development (November, 2007; Ref 17). The Sustainability Appraisal indicated that locating significant new development at most of the smaller settlements would seriously compromised landscape and other environmental objectives, and would not allow for efficient infrastructure provision.

**5.3.2 Spatial Option 4: New expanded town**

The creation of a new expanded town would have benefits since larger scale development increases the opportunity to deliver a higher level of affordable housing and also the potential to deliver site-wide energy strategies improving both affordable housing and the integration of renewable energy technologies. However, consideration would need to be given to ensuring any benefits such as new services, facilities, jobs and housing meet the needs of local people. This is particularly an issue for Paddock Wood where good train access could attract people who work in London to live in the Borough, therefore limiting any benefits for existing residents.

The effects such as accessibility, transport, air quality and climate change are very dependent on the location of any expansion. Areas such as Royal Tunbridge Wells, Southborough and Paddock Wood are well connected by existing public transport infrastructure whereas links to areas such as Cranbrook or Hawkhurst are much more limited and would increase the need to travel. Major expansion would involve greenfield land take and therefore would provide less incentive to use previously developed sites. This option could also affect sensitive landscape and ecology, particularly for Hawkhurst and Cranbrook, which are located within AONB and are also more likely to encroach onto protected habitats.



### **5.3.3 Economy 1: Continue to allow commercial sites, which generate local jobs, to be converted to, or redeveloped for housing in the main urban areas and rural towns**

Implementation of this alternative would have an adverse impact for the delivery of new employment. The loss of employment opportunities will have adverse effects for stimulating and sustaining economic growth and competitiveness across the Borough. Effects on employment opportunities are uncertain as the Borough's population is generally highly skilled and therefore a reduction may not necessarily lead to a loss of local jobs. In addition, the majority of respondents from the consultation on the Issues and Options Report, disagreed with this approach to development on the basis that it is important to maintain local employment opportunities and the economic position of the Borough.

Not implementing this option, however, will have an adverse effect on housing provision, unless adequate land can be found for housing without converting employment land.

### **5.3.4 Transport (b): Introducing congestion charging and significantly increasing car parking charges**

Congestion charging supports a reduction in pollution and vehicular transport by restricting car use, although use of alternative travel will depend upon implementation as charging along some routes could lead to congestion in others. Economics effects on residents, visitors and tourists would need to be considered. Benefits for reducing pollution and the need to travel by car will only be realised if the policy is supported by a viable sustainable transport alternative.

Significantly increasing car parking charges has similar effects to above, by restricting car use and promoting more sustainable transport modes. Adverse effects for economic growth could be mitigated to a degree through the promotion of alternative travel options. Effects on businesses and visitors would need to be considered.

### **5.3.5 Housing 4: All new housing developments to have a private car parking space even where communal or on-road spaces are available**

This alternative would have adverse effects for reducing pollution and vehicular travel by promoting car use. However, studies confirm restricting car use does not reduce car ownership; only the distance travelled by car. Reduced ownership therefore relates more to household size. Recommendations for reduced car parking to be provided at developments where appropriate (i.e. urban areas where there is a high accessibility to local services and facilities, good existing public transport and provision).

### **5.3.6 Housing 6: Thresholds for affordable housing**

A lower threshold could increase the level of affordable housing provision. However, if the threshold is too low then this may severely compromise the viability of development for small scale house builders, thereby limiting the delivery of affordable housing. A variable threshold (incorporated within the preferred option) would allow provision to be more appropriate to local needs although may risk the delivery of targeted affordable housing levels.

## **6. SIGNIFICANT CHANGES TO THE CORE STRATEGY**

### **Progressing the Core Strategy from the Preferred Options Stage to Submission**

During the preparation of the Submission DPD, the policy approaches identified in the Preferred Options may be altered. This may simply be a refinement of policy thereby providing greater clarity. However, it may be that the Submission Report includes changes to the approach to a policy from that proposed in the Core Strategy Preferred Options document. Between the Preferred Options stage and Submission, the SA is required to appraise any significant changes or differences to the policy arising from consultation at the Preferred Options stage. This includes changes arising any new evidence base that may have arisen during since the Preferred Options stage. This appraisal then informs the final Submission Report.

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

For the Tunbridge Wells Borough Council Core Strategy, many of the submission policies are closely based upon approaches proposed during the Preferred Options stage, however for some policies there are some differences which warrant additional appraisal (e.g. Core Policy 7: Employment). In addition, new evidence base documents have become available since the Preferred Options stage which have influenced the Core Strategy and therefore required further appraisal.

Table 7 below shows how the policies at the Preferred Options stage (appraised as part of the SA Report of the Preferred Options (Ref. 7)) relate to those in the Submission Report, and where significant changes arise (highlighted with **'bold'** text).

**Table 7: Core Strategy changes to policy from Preferred Options to Submission**

Preferred Options	Commentary on Changes and Additional Evidence Base	Submission Report 2009
<i>Spatial Strategy</i>		
<ul style="list-style-type: none"> <li>• To focus the majority of development at the main urban area of Royal Tunbridge Wells and Southborough</li> <li>• To pursue targeted regeneration and, possibly, modest extensions at the small rural town of Paddock Wood</li> <li>• At the small rural towns of Cranbrook and Hawkhurst, to allow (re)development in keeping with their roles as rural service centres and to meet rural exception housing needs</li> <li>• At the villages, to limit development to minor infill and redevelopment and to meet rural exception housing needs</li> </ul>	<p>Changes to strategy include:</p> <ul style="list-style-type: none"> <li>• Submission Report now includes the quantity of housing, employment and retail development to be delivered within (1) Main Urban Area, (2) Small Rural Towns, and (3) Villages</li> <li>• Less of an emphasis of increased development (such as modest extensions) at Paddock Wood in comparison to Cranbrook and Hawkhurst</li> <li>• Limiting development within the existing 'Limits to Built Development' at villages</li> <li>• More of a focus on PDL and protecting character of rural environment</li> </ul> <p>Submission SA Report has appraised the revised policy. In addition, the appraisal has been revised to take into account the additional evidence base (the Housing Needs Survey and SHLAA).</p>	<ul style="list-style-type: none"> <li>• To focus the majority of new development at Royal Tunbridge Wells and Southborough to support its role as a Regional Hub with Tonbridge while improving access to, from and within it (75% housing and 90% retail development within the main urban area, 20% housing and 10% retail within the small rural towns and 5% housing within the villages)</li> <li>• To pursue an urban focus for development in order to optimise the vitality of the Borough's town centres, to make optimum use of previously developed land and to protect the distinctive character of the rural environment by pursuing an urban focus for development</li> <li>• To provide sufficient development at Cranbrook, Hawkhurst and Paddock Wood to support and strengthen them as local service areas for the Borough's rural area</li> <li>• To protect the character of the Borough's villages by limiting new development to within the existing Limits to Built Development, unless it is specifically required to meet local needs</li> </ul>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Preferred Options	Commentary on Changes and Additional Evidence Base	Submission Report 2009
<i>General Policies</i>		
<b>Core Policy 7: Housing Provision</b>	The policy now addresses elderly/extra care housing provision. Policy now addresses housing land supply. Clearer wording on the proportion of housing development to be delivered on previously developed land or through conversion of existing buildings. Requirements now specified in relation to dwelling size and affordable housing provision. <b>Submission SA Report has appraised the revised policy.</b>	<b>Core Policy 6: Housing Provision</b>
Core Policy 8: Provision for Retail and Leisure	More detail added, policy strategy remains largely unchanged. Policy now includes a provision for improved linkages to areas of open space, sports and leisure facilities and communities which they serve which would have a positive effect on SA objective 6. However, this would not change the previous appraisal which predicted positive effects.	Core Policy 8: Retail and Leisure Provision
<b>Core Policy 9: Employment Provision</b>	<b>New text regarding strengthening the rural economy, the provision of employment land in locations as well as Tunbridge Wells Town Centre, the allocation of new employment land and a specific provision for the re-use of rural buildings for employment.</b> <b>Submission SA Report has appraised the revised policy.</b>	<b>Core Policy 7: Employment Provision</b>
Core Policy 10: Transport and Infrastructure	No significant changes.	Core Policy 3: Transport Infrastructure
Core Policy 11: Green Belt and Rural Fringe	More detail added, policy strategy remains unchanged.	Core Policy 2: Green Belt
Core Policy 12: Re-use of Previously Development Land and Buildings	More detail added, policy strategy remains unchanged.	Core Policy 1: Delivery of Development
<b>Core Policy 13: Natural Environment</b>	<b>Combined with Core Policy 14. Submission SA Report has appraised the revised policy.</b>	<b>Core Policy 4: Environment</b>
<b>Core Policy 14: Historic Built Environment</b>	<b>Combined with Core Policy 13. Submission SA Report has appraised the revised policy.</b>	<b>Core Policy 4: Environment</b>
<b>Core Policy 15: Climate Change</b>	<b>Combined with Core Policy 16, now includes more sustainable design concepts including waste reduction and recycling.</b> <b>Submission SA Report has appraised the revised policy.</b>	<b>Core Policy 5: Sustainable Design</b>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Preferred Options	Commentary on Changes and Additional Evidence Base	Submission Report 2009
Core Policy 16: Design Quality	Combined with Core Policy 15. Submission SA Report has appraised the revised policy.	Core Policy 5: Sustainable Design
<i>Place-Shaping Policies</i>		
Core Policy 1: Development in Royal Tunbridge Wells and Southborough	Split into two Core Policies with more detail added. Core Policy 9 now includes detail about RTW's role as a Regional Hub and more detail on transport requirements. Submission SA Report has appraised the revised policy.	Core Policy 9: Development in Royal Tunbridge Wells Core Policy 10: Development in Southborough
Core Policy 2: Development in Paddock Wood	New reference to maintaining the general extent of the greenbelt, less emphasis on permitting an extension to Paddock Wood Submission SA Report has appraised the revised policy.	Core Policy 11: Development in Paddock Wood
Core Policy 3: Development in the Rural Area	New emphasis on encouraging non-vehicular modes of transport within rural areas. Submission SA Report has appraised the revised policy.	Core Policy 15: Development in the Rural Area
Core Policy 4: Development in Cranbrook and Hawkhurst	Split into two Core Policies with more detail added. Submission SA Report has appraised the revised policy.	Core Policy 12: Development in Cranbrook Core Policy 13: Development in Hawkhurst.
Core Policy 5: Development in the Villages	New emphasis on protecting historical and environmental heritage and promoting sustainable forms of transport.  Submission SA Report has appraised the revised policy.	Core Policy 14: Development in the Villages
Core Policy 6: Development in the Countryside	Policy no longer included. Partly covered by Strategic Sustainability Objective 1 and Core Policy 15: Development in the Rural Area.	

In light of Table 7, the Sustainability Appraisal of the Delivery Strategy and Submission Core Policies 4, 5, 6, 7, 9, 10, 11, 12, 13, 14 and 15 have been updated as part of this SA Submission Report in order to reflect policy changes since from the Preferred Options Stage.

**7. HOW THE SA HAS INFLUENCED PLAN DEVELOPMENT**

Since public consultation on the Core Strategy Preferred Options Report, some of the key recommendations made in the SA Report of the Preferred Options and the initial results of the draft Submission Sustainability Appraisal have been taken into account in the preparation of the Submission Core Strategy objectives and policies. The responses received to Preferred Options consultation also heavily informed policy development. Table 8 demonstrates how the results of how the Sustainability Appraisal has influenced plan production since the Preferred Options stage.

**Table 8: How the Sustainability Appraisal Influenced Plan Development since the Preferred Options Stage**

<b>Core Strategy Policy</b>	<b>Incorporated Recommendations</b>	<b>Commentary</b>
Spatial Strategy	Ensuring new developments are designed to Lifetime Homes Standards would help to address the needs of the Borough’s aging population, by making homes adaptable to meet changing family circumstances.	Para 5.125 of Core Policy 5: Sustainable Design and Construction now states ‘the application of good space standards, such as Lifetime Homes and Building for Life allow for the adaptation, conversion or extension of buildings in the future’.
Objectives	Retain the Sustainable Development objectives of the Core Strategy to ensure environmental sustainability issues are addressed.	Sustainable Development Objectives have been retained.
Core Policy 4: Environment	Urban and rural landscapes should be protected and enhanced where possible (not protected or enhanced, as stated).	Wording changed as recommended.
	In addition to conserving and enhancing biodiversity, the Core Strategy needs to ensure policies are put into place to provide a means of creating biodiversity elsewhere where conservation and enhancement may not be possible on a development site. Developers should be required to reduce effects to biodiversity through changing the design or operation of a development, or compensating for the loss of biodiversity.	Policy wording had been changed and more detail added to the justification text of this policy to address this recommendation.
Core Policy 5: Sustainable Design and Construction	The Core Strategy also needs to promote sustainable construction practices.	Reference to sustainable construction now included in CP5.
	To maximise long-term effects, this Policy should ensure that developments are designed to adapt to all predicted effects of climate change, including hotter summers.	Adaptation to climate change issues are now covered in CP5.
	The Core Strategy should ensure that development is phased in order to keep pace with the development of new water resources – i.e. that development cannot occur until sufficient water supply is available.	The supporting text to CP5 makes reference to ensuring adequate water service provision.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Strategy Policy	Incorporated Recommendations	Commentary
	<p>Ensure the policy recognises the importance of quality in the public realm in creating safe places.</p> <p>The justification text should refer to the Kent Design Guide Supplementary Planning Document, which contains practical guidance for designing out crime.</p>	<p>Now incorporated in CP5 and justification text.</p>
	<p>Require the incorporation of sustainable waste management practices into new developments.</p>	<p>CP5 now requires new development to “<i>be designed to minimise waste creation and disposal throughout the lifetime of the development</i>”.</p>
	<p>Include sustainable design building standard targets, such as Code for Sustainable Homes and BREEAM.</p>	<p>The justification text of CP5 now states that ‘<i>the Council will apply the most up-to-date regional and national targets as a minimum (footnote) for example, the Code for Sustainable Homes and BREEAM</i>. This will ensure new developments will help in meeting carbon reduction targets set by the South East Plan.</p>
Core Policy 6: Housing Provision	<p>Where not enough PDL is available for redevelopment, the Core Strategy should seek to reuse and make improvements to existing building stock in the Borough before considering the development of greenfield sites.</p>	<p>CP6 now requires at least 65% of all housing development to be delivered on previously developed land or by the conversion of existing buildings.</p>
Core Policy 7: Employment Provision	<p>Employment floor space should only be increased in accessible locations (both in terms of public transport infrastructure and existing service and facility provision).</p>	<p>CP7 now specifies the safeguarding of Economic Development Areas for employment use if there are well located to public transport networks or main roads.</p>
Core Policy 12: Development in Cranbrook	<p>Ensure that new essential services and facilities are provided (where required) to meet the local needs of occupiers of new housing development.</p>	<p>CP12 now states that a new community facility will be provided and if necessary, a site allocated for this purpose.</p>
Core Policy 13: Development in Hawkhurst	<p>Ensure that new essential services and facilities are provided (where required) to meet the local needs of occupiers of new housing development.</p>	<p>CP13 now states that a new community facility will be provided and if necessary, a site allocated for this purpose.</p>
Core Policy 14: Development in the Villages	<p>Ensure that new essential services and facilities are provided (where required) to meet the local needs of occupiers of new housing development.</p>	<p>CP14 resists the loss of essential services and encourages both the development of facilities to meet local needs and the development of community facilities.</p>
Core Policy 15: Development in the Rural Areas	<p>An affordable and integrated public transport network that links opportunities for incidental exercise such as cycling and walking is required for rural areas in order to increase accessibility to health services and facilities and encourage active and healthy lifestyles.</p>	<p>CP15 will now encourage non-vehicular modes of transport between rural settlements and within rural areas by ensuring that the network of existing public footpaths and bridleways are protected, maintained and improved. New green routeways within and between settlements to encourage non-vehicular modes of transport will also be identified and planned for.</p>

### 8. APPRAISAL OF THE CORE STRATEGY POLICIES

#### SEA Directive:

Prediction of effects involves:

- Identifying the changes to the environmental baseline which are predicted to arise from the plan or programme, including alternatives. The predicted effects of alternatives can be compared with each other, or with 'no plan or programme' and/or 'business as usual' scenarios where these exist, and against the SEA objectives.
- Describing these changes in terms of their magnitude, their geographical scale, the time period over which they will occur, whether they are permanent or temporary, positive or negative, probable or improbable, frequent or rare, and whether or not there are secondary, cumulative and/or synergistic effects.

This section presents the results of the Sustainability Appraisal of the Submission Core Strategy. The Core Strategy Submission Report sets out a Spatial Strategy, which provides a directive plan of how the Core Strategy's Spatial Vision and Strategic Objectives will be achieved in practical terms. The Spatial Strategy broadly sets out how much development there will be, where it will go and when it will take place

A series of Core Policies then detail the fundamental principles that should be adhered to in order to deliver development in accordance with the Spatial Strategy. These include:

- Core Policy 1: Delivery of Development;
- Core Policy 2: Green Belt;
- Core Policy 3: Transport Infrastructure;
- Core Policy 4: Environment;
- Core Policy 5: Sustainable Design;
- Core Policy 6: Housing Provision;
- Core Policy 7: Employment;
- Core Policy 8: Retail and Leisure Provision;
- Core Policy 9: Development in Royal Tunbridge Wells;
- Core Policy 10: Development in Southborough;
- Core Policy 11: Development in Paddock Wood;
- Core Policy 12: Development in Cranbrook;
- Core Policy 13: Development in Hawkhurst;
- Core Policy 14: Development in the Villages; and
- Core Policy 15: Development in the Rural Areas

The full appraisal of the Spatial Strategy and Core Policies ('General' and 'Place-Shaping') is provided in Appendices C, D and E, respectively. The main sustainability implications of these policies are discussed within Sections 8.1 and 8.2 below.

### 8.1 SUSTAINABILITY IMPLICATIONS FOR THE CORE STRATEGY (SPATIAL STRATEGY AND CORE POLICIES)

The appraisal indicates that the Spatial Strategy and Core Policies are broadly sustainable, with benefits (or uncertain effects) identified. In particular, the appraisal highlights significant benefits for many aspects of social, economic and environmental sustainability:

#### *Social*

- Ensuring that everyone has the opportunity to live in a decent, sustainably constructed and affordable home (SA Objective 1);
- Improving health and wellbeing and reducing inequalities in health (SA Objective 2);
- Reducing poverty and social exclusion (SA Objective 3);
- Reducing crime and the fear of crime (SA Objective 5);
- Improving accessibility to all services and facilities for all (SA Objective 6); and
- Improving travel choice and to reduce the need to travel (SA objective 12).

#### *Economic*

- Ensuring high and stable levels of employment so everyone can benefit from the economic growth of the Borough (SA Objective 15); and
- Stimulating and sustaining economic growth and competitiveness across the Borough (SA Objective 16).

#### *Environmental*

- Addressing the causes of climate change through reducing emissions of greenhouse gases, and to increase energy efficiency in the Borough (SA Objectives 9 and 14); and
- Reducing the impact of resource consumption (SA objective 13).

Nonetheless, the appraisal has identified minor negative effects or uncertain effects for some Sustainability Appraisal objectives. These are summarised below.

*SA Objective 4: To raise educational achievement across the Borough and develop the opportunities for everyone to acquire the lifetime skills needed to find and remain in work and support the long-term competitiveness of the Borough*

No policy within the Core Strategy explicitly addresses this Sustainability Appraisal objective. The current trend of out-commuting of the Borough's highly skilled workforce, coupled with generally low paid jobs in leisure, tourism, business tourism and retailing (which are presently sustaining the local economy) and the effects of an ageing population could lead to future labour shortages. It is therefore important that the Core Strategy or wider LDF effectively addresses this issue to ensure all members of the community have access to opportunities needed to find and remain in work, which will have benefits for supporting the long-term competitiveness of the Borough. Suitable recommendations and mitigation measures to address SA Objective 4 are identified in Table 10 and within the detailed appraisal results for SA Objective 4 in Appendices C, D and E.

*SA Objective 7: To improve efficiency in land use through the reuse of previously developed land and existing buildings, including reuse of materials from buildings, and encouraging urban renaissance*

The appraisal has identified a number of policies that will contribute to addressing this objective. In particular, Core Policy 1: Delivery of Development requires the development of previously developed land (PDL) and the reuse of existing buildings prior to the development of greenfield sites.



Nonetheless, minor negative effects in the long-term have been recorded for Core Policies relating to increased development in the Borough. These include the Spatial Strategy, Core Policy 6: Housing Provision, Core Policy 9: Development in Royal Tunbridge Wells, Core Policy 10: Development in Southborough, Core Policy 11: Development in Paddock Wood, Core Policy 12: Development in Cranbrook, Core Policy 13: Development in Hawkhurst and Core Policy 14: Development in the Villages. This is due to results of the SHLAA, which identify that, in the long-term, the availability of PDL and the level of development required may result in the need to develop on greenfield sites. The availability of PDL has direct links with meeting biodiversity (SA Objective 10) and landscape (Countryside and Historic Environment, SA Objective 11) objectives, the results of which are summarised below.

### *SA Objective 10: To conserve and enhance the Borough's biodiversity*

The appraisal has identified a number of policies that will contribute to addressing this objective; in particular through Core Policies 1, 2, 4 and 5 which aim to protect the Green Belt/rural fringe, protect and enhance the natural environment, and prioritise development on PDL over greenfield sites.

However, minor adverse effects have been identified in the long-term for the Spatial Strategy, CP2: Green Belt, CP6: Housing Provision and a number of 'Place-Shaping' policies. This is due to the results of the SHLAA which identified a shortfall of PDL in the long-term meaning that some of the new housing identified for different settlements in the Borough may need to be delivered on greenfield sites in the long-term. This may have the potential to adversely affect some of the Borough's areas of biodiversity value. As indicated above, the availability of PDL has direct links with meeting biodiversity (SA Objective 10), countryside and historic environment (SA Objective 11) and efficient land use (SA Objective 7) Sustainability Appraisal objectives.

In addition, the justification text to CP1: Delivery of Development identifies that certain greenfield sites within the Limits to Built Development may need to be released after opportunities for development on PDL sites is exhausted, and that *"these will only be released where it is no longer necessary to protect them for either their public or visual amenity function and their development would not have a detrimental impact on the character of the area"*.

A range of suitable recommendations and mitigation measures to address SA Objective 10 are identified in Table 10 and within the detailed appraisal tables.

### *SA Objective 11: To protect, enhance and make accessible for enjoyment, the Borough's countryside and historic environment*








As indicated above, the SHLAA results identified a shortfall of PDL in the long-term meaning that some of the new housing identified for different settlements in the Borough may need to be delivered on greenfield sites in the long-term. Similar to effects on biodiversity, in the long-term this could also adversely impact the Borough's countryside and historic environment. Mitigation measures to address SA Objective 11 are identified in Table 10 and within the detailed appraisal tables.

## **8.2 SECONDARY, CUMULATIVE AND SYNERGISTIC EFFECTS**



















In accordance with the SEA Directive (Ref. 3), the magnitude, timing, likelihood, scale and permanence of the potential significant effects of implementing the Core Strategy have been assessed. These are documented in the appraisal tables included in Appendices C, D and E of this report. A summary of cumulative effects is provided in Table 6 below.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

The symbols used as part of the summary of cumulative effects are as follows:

- Beneficial Impact 
- Beneficial Impact (but potential for enhancement) 
- Uncertain Impact (Probably beneficial) 
- No Impact 
- Uncertain Impact (Probably adverse) 
- Adverse Impact (but potential for mitigation) 
- Adverse Impact 

**Table 9: Summary of Cumulative Effects**

Sustainability Appraisal Objective	Assessment Term			Comments
	Short	Medium	Long	
1 To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	n/a			<u>Beneficial:</u> SS, CP1, CP4, CP5, CP6, CP9, CP10, CP11, CP12, CP13, CP14, CP15 <u>Uncertain:</u> None <u>Adverse:</u> None
2 To improve the health and wellbeing of the population and reduce inequalities in health				<u>Beneficial:</u> SS, All CPs <u>Uncertain:</u> None <u>Adverse:</u> None
3 To reduce poverty and social exclusion				<u>Beneficial:</u> SS, CP1, CP23, CP5, CP6, CP7, CP8, CP9, CP10, CP11, CP12, CP13, CP14, CP15 <u>Uncertain:</u> None <u>Adverse:</u> None
4 To raise educational achievement across the Borough and develop the opportunities for everyone to acquire the lifetime skills needed to find and remain in work and support the long-term competitiveness of the Borough	-			<u>Beneficial:</u> SS, CP1, CP3, CP6, CP8, CP14, CP15 <u>Uncertain:</u> CP9, CP10, CP11, CP12, CP13 <u>Adverse:</u> None
5 To reduce crime and the fear of crime	-			<u>Beneficial:</u> SS, CP1, CP3, CP5, CP6, CP7, CP8, CP9, CP10, CP11, CP12, CP13, CP14 <u>Uncertain:</u> CP2 <u>Adverse:</u> None
6 To improve accessibility to all services and facilities, including employment, education, health services, shopping, green space, culture, leisure, recreation (CLR) facilities and a sustainable tourism sector				<u>Beneficial:</u> SS, All CPs <u>Uncertain:</u> None <u>Adverse:</u> None
7 To improve efficiency in land use through the reuse of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance				<u>Beneficial:</u> CP1, CP2, CP3, CP4, CP7, CP8 <u>Uncertain:</u> None <u>Adverse:</u> SS, CP6, CP9, CP10, CP11, CP12, CP13, CP14 (long-term)

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Sustainability Appraisal Objective	Assessment Term			Comments
	Short	Medium	Long	
8 To reduce pollution (to land, air and soil) and maintain and improve the water quality of the Borough's rivers, and to achieve sustainable water resources management	?	(☺)	☺	<u>Beneficial:</u> CP1, CP2, CP3, CP4, CP5, CP6, CP8, CP9, CP10 <u>Uncertain:</u> None <u>Adverse:</u> None
9 To address the course of climate change through reducing emissions of greenhouse gasses	-	?	(☺)	<u>Beneficial:</u> SS, CP1, CP2, CP3, CP4, CP5, CP6, CP7, CP8, CP9, CP10, CP11 <u>Uncertain:</u> None <u>Adverse:</u> None
10 To conserve and enhance the borough's biodiversity	?	?	☹	<u>Beneficial:</u> CP4, CP15 <u>Uncertain:</u> CP1, CP5, CP7, CP8 <u>Adverse:</u> SS, CP2, CP6, CP9, CP10, CP11, CP12, CP13, CP14 (long-term only)
11 To protect, enhance and make accessible for enjoyment, the Borough's countryside and historic environment	(☺)	?	☹	<u>Beneficial:</u> CP1, CP4, CP5, CP15 <u>Uncertain:</u> None <u>Adverse:</u> SS, CP2, CP6, CP9, CP10, CP11, CP12, CP13, CP14 (long-term only)
12 To improve travel choice and to reduce the need for travel, particularly by car to reduce road congestion	?	(☺)	☺	<u>Beneficial:</u> SS, CP1, CP3, CP5, CP6, CP7, CP8, CP9, CP10, CP11, CP12, CP13, CP15 <u>Uncertain:</u> None <u>Adverse:</u> None
13 To reduce the impact of resource consumption by using sustainably produced and local products and reducing waste generation and disposal	?	(☺)	☺	<u>Beneficial:</u> CP1, CP5, CP15 <u>Uncertain:</u> None <u>Adverse:</u> None
14 To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough	-	(☺)	☺	<u>Beneficial:</u> SS, CP1, CP3, CP5, CP6, CP7, CP8, CP9, CP10, CP11 <u>Uncertain:</u> None <u>Adverse:</u> None
15 To ensure high and stable levels of employment so everyone can benefit from the economic growth of the Borough	☺	☺	☺	<u>Beneficial:</u> SS, CP3, CP7, CP8, CP9, CP10, CP11, CP12, CP13, CP14, CP15 <u>Uncertain:</u> None <u>Adverse:</u> None
16 To stimulate and sustain economic growth and competitiveness across the Borough	☺	☺	☺	<u>Beneficial:</u> SS, CP3, CP6, CP7, CP8, CP9, CP10, CP11, CP12, CP13, CP14, CP15 <u>Uncertain:</u> None <u>Adverse:</u> None

The above table shows that the majority of cumulative effects are positive. Uncertain to negative cumulative effects are predicted in the medium to long-term in relation to biodiversity and countryside and historic environment (to a minor degree). This is due the effects of redevelopment of PDL and potentially greenfield sites as housing targets are realised. Some uncertainty is also predicted to natural resource consumption, travel and pollution.

**8.3 MITIGATING MEASURES**

As part of the appraisal process, mitigation measures have been identified in order to reduce any adverse effects and maximise the beneficial effects of the Core Strategy. Table 7 below provides a summary of the proposed mitigation measures for each SA Objective. The appraisal tables provided within Appendix C, D and E set out the full list of recommendations and explanations in relation to each objective.

**Table 10: Proposed Mitigation Measures**

<b>Preferred Option</b>	<b>Proposed Mitigation Measures</b>
<b>SA Objective 1: To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</b>	
Core Policy 6, Spatial Strategy, Place Shaping Policies	Spatially integrate new affordable housing to promote the development of mixed and balanced communities.
<b>SA Objective 2: To improve the health and wellbeing of the population and reduce inequalities in health</b>	
Spatial Strategy	Whilst new major development is likely to result in the provision of new community, health and/or sporting facilities, care should be taken so that additional residential development does not result in healthcare and recreation/leisure facilities exceeding their capacity.
Place Shaping Policies	The provision of different types of community facilities and infrastructure across the Borough should be prioritised according to existing and predicted local needs. The provision of a larger community facility within a significant development should be encouraged. Care should be taken so that additional residential development does not result in the capacities of existing health care and recreation/leisure facilities being exceeded.
<b>SA Objective 3: To reduce poverty and social exclusion</b>	
Spatial Strategy, Place-Shaping Policies, Core Policy 6	Ensure affordable homes are spatially integrated within new housing developments to promote the development of mixed and balanced communities and to avoid creating pockets of social deprivation.
Core Policy 11	Prioritise new jobs for local residents where possible.
Core Policy 3	Ensure public transport is affordable to all.
Core Policy 5	Reinstate the policy requirement to deliver sustainable transport. More detailed policies and/or guidance is required in order to ensure the objectives of Core Policy 5 are successfully implemented.
<b>SA Objective 4: To raise educational achievement across the Borough and develop the opportunities for everyone to acquire the lifetime skills needed to find and remain in work and support the long-term competitiveness of the Borough</b>	
Spatial Strategy	Consideration needs to be given to the capacity of existing educational facilities and a policy needs to be included that will ensure an overall increase of education facilities is achieved.
Core Policy 6, Spatial Strategy	Consideration needs to be given to the capacity of existing educational facilities to ensure all residents in the Borough (new and existing) have good access to education and training opportunities.
All	No policy within the Core Strategy explicitly addresses the need to raise educational achievement across the Borough or to develop opportunities for everyone to acquire the lifetime skills needed to find and remain in work. The Core Strategy or wider LDF must therefore consider the provision of new educational and training infrastructure for all members of the community (in accordance with existing or future needs).
Core Policy 7	Subject to viability/feasibility considerations, consider encouraging Local labour agreements between developers of major developments and the Council, particularly for new developments to be located within areas of existing social deprivation.

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

<b>Preferred Option</b>	<b>Proposed Mitigation Measures</b>
<b>SA Objective 5: To reduce crime and the fear of crime</b>	
Core Policy 6	Spatially integrate new affordable housing in order to avoid creating pockets of social deprivation which can create or exacerbate crime and the fear of crime.
Core Policy 3	This Policy should ensure that footpaths, cycleways and public transport infrastructure such as bus stops and train stations are convenient and safe for users across the whole Borough, not just for rural areas.
Core Policy 2	Green Belt areas with a history of crime problems should be access controlled in order to help reduce crime and the fear of crime.
<b>SA Objective 6: To improve accessibility to all services and facilities, including employment, education, health services, shopping, green space, culture, leisure, recreation (CLR) facilities and a sustainable tourism sector</b>	
Spatial Strategy, Place-Shaping Policies, Core Policy 6	The Core Strategy needs to ensure that new essential services and facilities are provided (where required) to meet the local needs of occupiers of new housing development (including affordable housing to meet identified local needs on rural exception sites). Consideration needs to be given to the capacity of existing facilities to ensure all residents in the Borough (new and existing) can utilise available services and facilities.
Spatial Strategy	Royal Tunbridge Wells, Southborough and Paddock Wood offer the greatest opportunity to deliver new services or facilities or alternatively, provide contributions towards upgrading existing facilities. Contribution requirements for development should be reviewed in line with the results of the various studies being undertaken to support the Core Strategy and identified and predicted local need.
Core Policy 11	Ensure that workers have the opportunity to access sustainable modes of travel, particularly between residential and employment uses within Paddock Wood. This, combined with the provision of new employment space, may help to reduce the level of out-commuting by the resident workforce.
Core Policy 3	Work with partners to help ensure public transport is priced affordably.
Core Policy 2	In urban areas where access to open spaces is limited, seek to revise the Green Belt boundary in order to improve informal recreational and leisure opportunities.
Core Policy 5	More detailed policy and/or guidance is required in order to ensure the sustainable transport objective of this Policy is successfully implemented.
<b>SA Objective 7: To improve efficiency in land use through the reuse of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance</b>	
None.	
<b>SA Objective 8: To reduce pollution (to land, air and soil) and maintain and improve the water quality of the Borough’s rivers, and to achieve sustainable water resources management</b>	
Spatial Strategy, Place Shaping Policies	In order to minimise contamination, the LDF should consider restrictions on the types of SUDS appropriate to certain areas, depending on the nature of the proposed development and the location of the development site with regards to groundwater vulnerability (SPZs). The allocation of new industrial sites (and other potential polluters) should also be situated away from these areas.  Consideration should also be given to safeguarding land for the provision of new water resource infrastructure to support additional development planned for the Borough.  Further investigation should be undertaken to further define Flood Zones 3a/b for the local water course. Only water compatible uses or essential infrastructure as listed in PPS25 should be permitted within Flood Zone 3b.  Some rural settlements are located in proximity to aquifers vulnerable to contamination. Direct (e.g. into groundwater) and indirect (e.g. infiltration of discharges onto land) contamination sources must be appropriately mitigated.
Core Policy 9	Sustainable design, construction and operation needs to be adhered to in order to avoid potential contamination of the tributaries of the River Medway and River Teise.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Preferred Option	Proposed Mitigation Measures
Core Policy 6, 7, 1, Spatial Strategy, Place Shaping Policies	Flood Risk Assessments (FRAs) should be prepared as part of planning applications for those developments which fall within the criteria stated within the TWBC SFRA (section 10.1.1). In addition, FRAs for developments in Paddock Wood, Five Oak Green and Cranbrook consider flooding from the sewer system and the consequences of a failure of the drainage system through blockage. FRAs for developments in Paddock Wood, Five Oak Green, Frittenden and Lamberhurst should also consider the risk of overland flow to and from the development.
Core Policy 7	Ensure employment-related development is located only in accordance with the findings of the SFRA.
Core Policy 3	Consider actively promoting walking and cycling through campaigns such as car-free days, car-schedules, cycling/walking promotions, free cycle hire days etc. This Policy needs to be supported by further detailed policy (such as through the DC Policies DPD) and/or guidance, including the requirement for Transport Assessments and Green Travel Plans.
Core Policy 5	More detailed policies and/or guidance is required in order to successfully implement this Policy. This could be in the form of a Sustainable Design and Construction SPD.
<b>SA Objectives 9 and 14: To address the causes of climate change through reducing emissions of greenhouse gases, and to increase energy efficiency in the Borough</b>	
General Policies, Spatial Policies	Where developments have shown maximum energy efficiency measures, financial contributions towards the provision of offsite renewable or community heating schemes could be required (where viable) where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy. Feasibility of larger scale renewables should be considered further including potential land allocations. This would need to be addressed within the Site Allocations DPD. It is also recommended that additional initiatives to further reduce carbon emissions from existing building stock should be considered as this is where the majority of emissions originate. This could include retrofitting renewable energy technologies and improving the energy efficiency of existing buildings.
Core Policy 5	Further detailed policies and/or guidance is required to ensure the successful implementation of this Policy.
<b>SA Objective 10: To conserve and enhance the Borough's Biodiversity</b>	
All	In order to avoid potential adverse effects on nearby European Sites (in particular Ashdown Forest), the Appropriate Assessment undertaken in 2009 by Scott Wilson recommends that TWBC should monitor progress of the ongoing assessment and recreational management studies being undertaken by Wealden District Council on the Ashdown Forest SAC/SPA and be prepared to participate in any collaborative cross authority management plan or associated scheme that may ultimately be developed from these studies. Any such measures would need to be applied by TWBC through incorporated into future DPDs or SPDs. In addition, the Appropriate Assessment identifies that if the increase in population resulting from the delivery of 6,000 new homes within the District would reduce the ratio of accessible natural greenspace to population, then new areas of accessible greenspace would need to be identified and delivered at a minimum rate of 1ha/1000 new population (this being Natural England's Accessible Natural Greenspace Standard).
Spatial Strategy	Site allocations need to give careful consideration to the landscape and biodiversity sensitivities of the Borough and its settlements. Further analysis of both of these values should be undertaken at the site allocations stage of the LDF.
Core Policy 1	Alter the justification text to ensure that greenfield sites will only be released where they would not have a detrimental impact on sites designated for biodiversity value.
Core Policy 3	Ensure new transport infrastructure incorporates ecological enhancements and Sustainable Urban Drainage System (SUDS) technologies.
Core Policy 4, 5	Given the high number of biodiversity constraints located within the Borough, more detailed guidance is required on how to design for biodiversity to support this Policy as part of the wider LDF (e.g. in the form of a Supplementary Planning Document).

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Preferred Option	Proposed Mitigation Measures
	More detailed policies and/or guidance (such as a Sustainable Design and Construction Supplementary Planning Document) is required to support these Core Policies.
<b>SA Objective 11: To protect, enhance and make accessible for enjoyment, the Borough’s countryside and historic environment.</b>	
Place-Shaping Policies	Only permit new development in those areas capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.
General Policies	<p>The LDF should include standards that meet Natural England criteria for the provision of natural/semi natural sites for new developments:</p> <ul style="list-style-type: none"> <li>• <i>Provision of at least 2ha of accessible natural green space per 1,000 population;</i></li> <li>• <i>No person should live more than 300m from their nearest area of natural green space; and</i></li> <li>• <i>There should be at least one accessible 20ha site within 2km from home</i></li> </ul> <p>Any alternative recreational space must be appropriate for the uses. The timing of the provision of such open spaces is also important with ideally provision made in advance of the relevant new developments being occupied.</p>
<b>SA Objective 12: To improve travel choice and to reduce the need for travel, particularly by car to reduce road congestion</b>	
Place shaping Policies	<p>Commercial or housing development applications of more than 10 units should be required to demonstrate that alternatives to road transport are being utilised wherever practical and will minimise the distance necessary, including the number and length of vehicle journeys</p> <p>In cases where there is no extra network or infrastructure capacity, mitigation should be expected to support transportation improvements directly linked to the development.</p>
Core Policy 11	Ensure that workers have the opportunity to access sustainable modes of travel, particularly between residential and employment uses within Paddock Wood.
Core Policy 3	<p>Benefits could be maximised by seeking to reduce the need to travel in the first instance by encouraging mixed use development (covered under CP1) and other initiatives such as live/work units.</p> <p>This Policy needs to be supported by further detailed policy (such as through the DC Policies DPD) and/or guidance, including the requirement for Transport Assessments and Green Travel Plans, the requirement for limited parking or car free developments, car club schemes and cycle hire, and promoting green energy cars if cars are required.</p>
Core Policy 5	More detailed policy and/or guidance is required to ensure this Policy is successfully implemented.
<b>SA Objective 13: To reduce the impact of resource consumption by using sustainably produced and local products and reducing waste generation and disposal</b>	
General Policies	<p>The Core Strategy must encourage new developments to follow the <u>full</u> waste hierarchy – prevention, reuse, recovery and recycling of waste during design, demolition and/or construction and operation phases and, where appropriate, include a range of appropriate waste management facilities. CP5 goes some way to address this issue by requiring new developments to minimise waste creation and disposal, however the Core Strategy should also focus on reuse, recovery and recycling of waste.</p> <p>The Core Strategy should also make reference to the Minerals and Waste Development Framework being produced by Kent County Council, which will be of relevance to the Borough of Tunbridge Wells.</p>
<b>SA Objective 15: To ensure high and stable levels of employment so everyone can benefit from the economic growth of the Borough</b>	
Place shaping, Core Policy 7	Subject to viability considerations, local labour agreements could be secured with the Council for major developments to, where necessary, enable local people to access jobs, apprenticeships or jobs placements in the construction and and/or end use phases of developments in order to meet the wider needs of the community.

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

---

<b>Preferred Option</b>	<b>Proposed Mitigation Measures</b>
<b>SA Objective 16: To stimulate and sustain economic growth and competitiveness across the Borough</b>	
Core Policy 9, 10, 11, 7	Subject to viability considerations, consider utilising Local Business Agreements for major developments to provide local businesses with opportunities to compete for contracts by highlighting the procurement opportunities for the Borough’s small businesses and building the capacity of small businesses to compete for contracts.  Again subject to viability considerations, consider requiring developers to contribute smaller affordable work spaces (or offsite contributions) for employment uses (since small start-up enterprises are likely to be more reliant on public transport).

---



### 9. SUMMARY AND IMPLEMENTATION

#### 9.1 SUMMARY

The SA process has helped to inform the preparation of the Core Strategy DPD, with recommendations put forward in earlier stages and throughout the appraisal process incorporated into the Preferred Options Report. This SA demonstrates that the Strategic Objectives, Spatial Strategy and Core Policies presented in the Core Strategy Submission Report generally accord with the principles of sustainable development. A range of positive and very positive effects have been recorded against most of the sustainability objectives contained within the Sustainability Appraisal Framework. A number of recommendations and mitigation measures have been identified for the Policies of the Core Strategy to help mitigate potentially adverse effects and maximise positive effects. Ultimately, success of the Policies will depend on their implementation.

#### 9.2 LINKS TO OTHER TIERS OF PLANS, PROGRAMMES OR PROJECTS

This Core Strategy DPD provides a policy framework based on sound spatial development principles. As highlighted, the majority of policies are likely to result in positive effects, particularly in relation to a number of aspects of social and economic sustainability. However, it is essential that the policy 'gaps' identified as part of the preferred options appraisal are adequately addressed in order to create a holistic planning strategy. Implementation will also be critical to the success of the Core Strategy and raises some key issues identified below:

- Many of the policies in the Core Strategy will need to rely on detailed policies (within the subsequent DPDs) and/or supplementary guidance documents (such as Supplementary Planning Documents) to ensure that policy aims are realised. As highlighted, sustainable design and construction is a critical issue for the LDF. Successfully achieving high levels of sustainable design and construction across the Borough would result in benefits for a number of sustainability areas, including the efficient use of natural resources including energy, water and materials, reducing, reusing and recycling waste, protecting, creating and enhancing ecology, improving health and wellbeing, and avoiding pollution.
- To assist with the successful implementation of the Core Strategy policies, consideration should be given to the work or programmes of other delivery agents that may have the responsibility for, or are better placed, to address or meet policy objectives, such as Kent County Council who are responsible for producing Education Strategic Plans, Local Transport Plans and the Minerals and Waste Development Framework for Kent. Where appropriate, the Core Strategy should make reference to these plans together with reference to the appropriate policies within the DC Policies DPD, the Site Allocations DPD, Supplementary Planning Documents within the LDF, or other methods proposed for implementation.
- Policies and objectives of the Core Strategy will need to be delivered in the context of the LDF as a whole and the wider policy framework which sits alongside the planning system. For example, the Allocations DPD will need to give careful consideration to site selection, maximising efficient use of land resources whilst having regard to the high number of ecology and landscape constraints in the Borough. In addition, the Core Strategy should include links with the range of emerging or adopted SPD's, Area Action Plans (AAPs) and Conservation Area Appraisals in order to ensure the LDF effectively functions as a holistic framework for delivering the Borough's planning strategy.

The SA process has helped to inform the preparation of the Core Strategy DPD, with many recommendations put forward in earlier stages and throughout the appraisal process being incorporated into the Core Strategy Submission Report. There are policies in the Core Strategy which aim to achieve sustainable development in the Borough which, when combined with national and regional policies, should help to mitigate any potentially adverse effects and maximise positive effects. Success will depend on their application.

### 9.3 NEXT STAGE OF THE PLANNING PROCESS

#### 9.3.1 Appraising significant changes resulting from representations

The Core Strategy DPD has now been finalised for submission to the Secretary of State for an independent examination. This SA Report provides part of the evidence base and will be used to assess the soundness of the DPD.

As a result of the examination, the Inspector will produce a report with recommendations which will be binding upon the Planning Authority. Where the Inspector suggests significant changes in the binding report, the SA must be amended by the Planning Authority to show these changes have been appraised. This is to meet the requirements of task D2(ii) of the ODPM (2005) guidance.

#### 9.3.2 Making decisions and providing information

The information in the SA Report, and responses to the final consultation, must be taken into account during the preparation of the Core Strategy and before it is finally adopted. An SA/SEA adoption statement must be produced to accompany the adopted Core Strategy outlining:

- How the findings of the SA have been taken into account;
- How sustainability in general has been integrated into the plans;
- Changes to the Core Strategy as a result of the SA process;
- Responses to consultation; and
- How monitoring will be carried out.

This will be published on the Council's website and made available to the public and statutory bodies in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 36 of the Town and Country Planning (Local Development Regulations) 2004.

#### 9.3.3 Proposals for Monitoring

Having predicted and evaluated all the significant effects arising from the Core Strategy, Table 11 (overleaf) includes suggested indicators as identified in the SA Framework of the Scoping Report (Ref. 2) and the TWBC Annual Monitoring Report (2008) (Ref. 28) to monitor these effects.

This is a draft monitoring framework and the final agreed list of indicators will be provided in the SEA Statement provided when the Core Strategy is adopted.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

**Table 11: Proposals for Monitoring the Significant Effects of the Core Strategy**

<b>What needs to be monitored?</b>	<b>Suggested Indicators</b>	<b>Source</b>
<i>Housing</i>		
Amount of housing to meet local needs (including rural areas)	Housing completion figures	AMR H1 (a – e), H2 (a – e)
Supply of affordable housing both in numbers and as a proportion of total housing stock	House Prices and Historical House Price Averages	AMR Contextual Indicator H1, Land Registry of England and Wales
Unfit/non-decent homes in the Borough	Number of unfit homes per 1,000 dwellings	Audit Commission, Voluntary Quality of Life Indicators
Adoption of sustainable design and construction practices in housing	Code for Sustainable Homes ratings for all new development	BRE and TWBC
	Building for Life Assessments	AMR Core Topic Theme H6
Range of house sizes, types, tenures and levels of affordability	House Prices by Type	AMR Contextual Indicator H2, Land Registry of England and Wales
	Affordable housing (house price/ earnings affordability ratio)	Audit Commission, Voluntary Quality of Life Indicators
<i>Health and wellbeing</i>		
Accessibility of healthcare services by non-car means	Proportion of journeys on foot or by cycle Access to a GP	Quality of Life Counts, Audit Commission Indices of Deprivation, Communities and Local Government
Protection and provision of facilities and locations of sporting/recreational activities (e.g. playing fields, sports facilities, cycleways, footpaths etc)?	Participation in sports and cultural activities	Quality of Life Counts, Audit Commission
Access to the countryside	Access to the countryside	Quality of Life Counts, Audit Commission
<i>Poverty and social exclusion</i>		
Employment opportunities	Number of jobs within the Borough	Contextual Indicator BD2, Tunbridge Wells Labour Market Profile
	Employee jobs within the Borough by Sector	Contextual Indicator BD2, Annual Business Inquiry Kent County Council
Average Wage	Average earnings – average hourly earnings (including overtime and premium pay) for full-time employees only	DTI Business Competitiveness Indicators (Unitary/Local Authority/Learning and Skills Council areas/NUTS areas)

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

What needs to be monitored?	Suggested Indicators	Source
Unemployment Levels	Unemployment in the Borough (measured by number of claimants of Job Seekers Allowance)	AMR Contextual Indicator BD3, Tunbridge Wells Labour Market Profile
Level of Deprivation	Deprivation indices by Super Output Areas	AMR Contextual Indicator 4, Communities and Local Government
<i>Education and training</i>		
Skills / Qualifications of Borough residents	Proportion of 19 year olds with Level 2 qualifications (5 GCSEs A*-C or NVQ equivalent)	Audit Commission, Voluntary Quality of Life Indicators
	Percentage of population of working age (16 to 64/ 59) with qualifications to either NVQ Level 1/ 2 equivalent, NVQ Level 3 or 4 or a trade apprenticeship or with no formal qualifications (DTI Business Competitiveness Indicators)	Unitary/Local Authority/Learning and Skills Council areas/NUTS areas
	Proportion of adults with poor literacy and numeracy skills	Learning and Skills Council
<i>Crime and the fear of crime</i>		
Level of Crime	Level of crime	AMR Contextual Indicator 5, Home Office Research Development Statistics Kent Police
Fear of Crime	Fear of crime (Local Quality of Life Counts)	Quality of Life Counts, Audit Commission
<i>Accessibility</i>		
Accessibility to key community services	Retention of Community Services	AMR Local Indicator LS1
Number of new mixed-use development with good accessibility to local facilities and services	Housing Completion figures	AMR
Accessibility by non-vehicular modes of transport	Movement across Royal Tunbridge Wells inner and outer cordons by mode	AMR Contextual Indicator TP1, Kent Travel Report, Kent County Council
	Journeys taken from Tunbridge Wells Railway Station	AMR Contextual Indicator TP2, Journey numbers derived from ticket sales, Kent Travel Report
<i>Efficiency in land use</i>		
Proportion of new development on Previously Development Land (PDL)	Amount of new and converted dwellings on PDL	AMR Core Topic Theme H2(d)
	Total amount of employment floorspace on PDL	AMR Core Topic Theme BD2
Number of existing building conversions	Number of existing buildings converted per annum	Employment Land Survey, KCC
Density	Housing density of new developments	TWBC Core Output Indicators

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

What needs to be monitored?	Suggested Indicators	Source
<i>Pollution</i>		
Sustainable transport patterns	Movement across Royal Tunbridge Wells inner and outer cordons by mode	AMR Contextual Indicator TP1, Kent Travel Report, Kent County Council
	Journeys taken from Tunbridge Wells Railway Station	AMR Contextual Indicator TP2, Journey numbers derived from ticket sales, Kent Travel Report
National air quality strategy objectives	Number of days of when air pollution is moderate or higher	Local Quality of Life Counts, Audit Commission
River ecology standards needed to meet the requirements of the EU Water Framework Directive	Rivers of Good or Fair chemical and biological water quality	Audit Commission, Voluntary Quality of Life Indicators
	Number of incidents of major and significant water pollution	Environment Agency Southern Regional Office
Per capita consumption of water	Per capita consumption (PCC) of water	South East Water/ Mid-Kent Water
	Capacity during 'critical periods' to supply water without the need for restrictions	Integrated Regional Framework, SEEDA
Flood Risk	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds	AMR Contextual Indicator E1, Environment Agency
	Areas of Flood Risk	AMR Contextual Indicator E3, Environment Agency Southern Region Flood Risk Maps
<i>Climate Change</i>		
Energy Use	Average energy use per household in Tunbridge Wells Borough	AMR Contextual Indicator E4, AMR Survey
Renewable Energy Generation	Number of developments with renewable energy generation	AMR Core Topic Theme E3
Greenhouse gas emissions from domestic, commercial and industrial sources	CO2 emissions by sector and per capita emissions (tonnes per year)	Audit Commission, Voluntary Quality of Life Indicators (Definitions Handbook, Audit Commission)
<i>Biodiversity</i>		
Protection and enhancement of the Borough's areas of biodiversity importance	Changes in areas of biodiversity importance	AMR Core Topic Theme E2
	Extent of ancient woodlands in the Borough	Kent Habitat Survey 2003
	Condition of SSSIs and designated sites	English Nature
	Net change in natural/ semi natural habitats	Local Quality of Life Counts, Audit Commission
Delivery of local biodiversity targets	Achievement of Local Biodiversity Action Plan (BAP) targets	Kent County Council

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

What needs to be monitored?	Suggested Indicators	Source
<i>Countryside and Historic Environment</i>		
Protection, enhancement and restoration of the Borough's natural environmental assets and attractive countryside (e.g. the Green Belt, parks and green spaces, common land, woodland and forests, AONBs etc)	Condition of the High Weald AONB	Kent High Weald Project
	Amount of Eligible Open Spaces managed to Green Flag Award standard	AMR Local Indicator LS3
	Land covered by management schemes i.e. designated sites including AONB, SSSIs, Local Natures Reserves and Sites of Local Nature Conservation Interest	TWBC/ Natural England/ or appropriate management body
Protection, enhancement and restoration of the Borough's cultural and heritage assets (e.g. SAMs, Listed Buildings, Historic Parks and Gardens, Conservation Areas etc)?	Number of Listed Buildings	AMR Contextual Indicator E1, TWBC
	Number of buildings at risk as a percentage of all Listed Buildings	TWBC
	Number of Conservation Areas	AMR Contextual Indicator E2
	Number of applications in Conservation Areas (as a percentage of properties in Conservation Areas; as a percentage of the total number of applications)	TWBC
	Loss or damage to Listed Buildings, scheduled ancient monuments, historic parks and gardens, historic landscapes and their settings	TWBC/ English Heritage
Accessibility of the Borough's countryside and historic environment in sustainable and well-managed ways?	Amount/retention/provision of recreation open space	AMR Local Indicator LS2
	Retention of Green Belt	AMR Local Indicator E1
<i>Sustainable Transport</i>		
Use and availability of sustainable transport modes	Movement across Royal Tunbridge Wells inner and outer cordons by mode	AMR Contextual Indicator TP1, Kent Travel Report, Kent County Council
	Journeys taken from Tunbridge Wells Railway Station	AMR Contextual Indicator TP2, Journey numbers derived from ticket sales, Kent Travel Report
	Proportion of travel by mode	Quality of Life Counts, Audit Commission
<i>Resource Consumption and Disposal</i>		
Adoption of sustainable design and construction principles in new development	Percentage of new build and conversions meeting Code for Sustainable Homes minimum (and above) requirements	Building Research Establishment/ TWBC
	Percentage of commercial buildings meeting minimum (and above) BREEAM standards	Building Research Establishment, TWBC

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

What needs to be monitored?	Suggested Indicators	Source
Prevention, reuse, recovery and recycling of waste	Household waste recycling	KCC, TWBC
	Percentage of the total tonnage of all types of waste (municipal solid waste, construction and demolition and industrial) that has been recycled, composted, used to recover heat, power and other energy sources, and landfilled	KCC, TWBC
Energy Use	Average energy use per household in Tunbridge Wells Borough	AMR Contextual Indicator E4, AMR Survey
Renewable Energy Generation	Number of developments with renewable energy generation	AMR Core Topic Theme E3
Greenhouse gas emissions from domestic, commercial and industrial sources	CO2 emissions by sector and per capita emissions (tonnes per year)	Audit Commission, Voluntary Quality of Life Indicators
Per capita consumption of water	Per capita consumption (PCC) of water	South East Water/ Mid-Kent Water
	Capacity during 'critical periods' to supply water without the need for restrictions	Integrated Regional Framework, SEEDA
<i>Employment</i>		
Number and diversity of employee opportunities	Number of jobs within the Borough	Contextual Indicator BD2, Tunbridge Wells Labour Market Profile
	Employee jobs within the Borough by Sector	Contextual Indicator BD2, Annual Business Inquiry Kent County Council
Average Wage	Average earnings – average hourly earnings (including overtime and premium pay) for full-time employees only	DTI Business Competitiveness Indicators (Unitary/Local Authority/Learning and Skills Council areas/NUTS areas)
Unemployment Levels	Unemployment in the Borough (measured by number of claimants of Job Seekers Allowance)	AMR Contextual Indicator BD3, Tunbridge Wells Labour Market Profile
<i>Economy</i>		
Economic Activity	Economic Activity Rates	AMR Contextual Indicator BD1
	VAT Registrations	AMR Contextual Indicator BD4
	Total amount of additional employment floorspace by type	AMR Core Topic Theme BD2
	Total amount of floorspace for 'town centre uses' within town centre areas	AMR Core Topic Theme BD(i)
	Net changes in B1/A2/B2 and B8 Floorspaces	Annual decisions monitoring TWBC

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### GLOSSARY AND ABBREVIATIONS

AONB	Areas of Outstanding Natural Beauty (AONBs) are designated under the National Parks and Access to the Countryside Act (1949), and along with National Parks they represent the finest examples of countryside in England and Wales.
Brownfield Site	A piece of previously developed land or buildings that is abandoned or underused and often environmentally contaminated, especially one considered as a potential site for redevelopment. Such redevelopment reduces pressure for the development of green field sites.
CLR	Culture, leisure, recreation.
Conservation Area	An area designated under the Planning (Listed Buildings And Conservation Areas) Act 1990 as being of special architectural or historic interest, the character and interest of which it is desirable to preserve and enhance.
DPD	Development Plan Document – A Local Development Document which forms part of the statutory development plan, including the Core Strategy, Proposals Map and Area Action Plans.
Green Belt	Green Belt is undeveloped land which has been specifically designated for long-term protection. It is a nationally important designation. Green Belt land has a number of purposes, including, preventing urban sprawl.
IMD	Index of Multiple Deprivation - A ward-level index made up from six indicators (income; employment; health deprivation and disability; education; skills and training; housing; and geographical access to services). IMD can help to identify areas for regeneration.
LDD	Local Development Document – comprising two types, Development Plan Documents and Supplementary Planning Documents, which together form the Local Development Framework.
LDF	Local Development Framework – the portfolio of Local Development Documents which sets out the planning policy framework for the Borough.
LDS	Local Development Scheme - a three year project plan setting out the Council's programme for the preparation of Local Development Documents, reviewed annually in the light of the Annual Monitoring Report.
LEAP	Local Equipped Area for Play.
Listed Building	A building included on a list of buildings of architectural or historic interest, compiled by the Secretary of State, under the Planning (Listed Buildings And Conservation Areas) Act 1990.
LWS	Local Wildlife Sites are small and isolated pockets of undisturbed habitat, which can link fragmented Sites of Special Scientific Interest.
NEAP	Neighbourhood Equipped Area for Play.
ODPM	Office of the Deputy Prime Minister.
PPG	Planning Policy Guidance - Guidance documents which set out national planning policy.
PPS	Planning Policy Statement – Guidance documents which set out national planning policy. They are being reviewed and updated and are replacing PPGs.
SA	Sustainability Appraisal - A process by which the economic, social and environmental effects of a project, strategy or plan are assessed.
SAM	A nationally important archaeological site included in the Schedule of Ancient Monuments (SAM) maintained by the Secretary of State for the Environment under the Ancient Monuments and Archaeological Areas Act 1979.
SCI	Statement of Community Involvement – sets out the Council's vision and strategy for the standards to be achieved in involving the community and stakeholders in the preparation of all Local development Documents and in decisions on planning applications.
SEA	Strategic Environmental Assessment - systematic method of considering the likely effects on the environment of policies, plans and programmes.
SHLAA	Strategic Housing Land Availability Assessment.
SHMA	Strategic Housing Market Assessment.
SPD	Supplementary Planning Document – a Local Development Document which is part of the Local development Framework but does not form part of the statutory development plan. SPDs elaborate upon policies and proposals in a Development Plan Document or 'saved' policies and include development briefs and guidance documents.
SPG	Supplementary Planning Guidance – guidance which elaborates upon policies and proposals in the Local Plan.
SSSI	Site of Special Scientific Interest - The best sites for wildlife and geological features in England as designated under the Wildlife and Countryside Act 1981.
TWBC	Tunbridge Wells Borough Council



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### LIST OF REFERENCES

- Ref 1. Tunbridge Wells Borough Council, 2009. Local Development Framework, Core Strategy Submission Report
- Ref 2. Waterman Environmental, 2005. Sustainability Appraisal Scoping Report for Tunbridge Wells Borough Local Development Framework (LDF), issued for consultation in September 2005 and finalised in March 2006.
- Ref 3. Council of the European Union. 2001. Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment.
- Ref 4. ODPM, 2004. The Planning and Compulsory Purchase Act. HMSO, Norwich.
- Ref 5. ODPM, 2005. Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. HMSO, Norwich.
- Ref 6. Waterman Environmental, 2007. Initial Sustainability Appraisal Report, issued for consultation in February 2007
- Ref 7. Waterman Environmental, 2007. Sustainability Appraisal Report of the Core Strategy Preferred Options, issued for consultation in November 2007
- Ref 8. Communities and Local Government, 2007 Consultation on Planning Policy Statement (PPS) 1: Planning and Climate Change, Supplement to PPS 1
- Ref 9. Communities and Local Government, 2006: Planning Policy Statement 3: Housing
- Ref 10. Communities and Local Government, 2006: Planning Policy Statement 25: Development and Flood Risk
- Ref 11. Communities and Local Government, 2006: Water Efficiency in New Buildings, HMSO, Norwich
- Ref 12. Kent County Council, 2006: The Kent and Medway Structure Plan
- Ref 13. Kent County Council, 2006: Local Transport Plan, Kent 2006-11
- Ref 14. Kent Partnership, 2006: Vision for Kent: Kent people in partnership for a better tomorrow
- Ref 15. Kent County Council, 2006: Planning for Minerals in Kent 2006 to 2021: The Core Minerals Strategy Development Plan Document
- Ref 16. Kent County Council, 2005: Kent Environmental Strategy Progress Report 2005
- Ref 17. Kent County Council, 2003: West Kent Area Investment Framework
- Ref 18. Communities and Local Government, 2006: Building a Greener Future, Towards Zero Carbon Development Consultation
- Ref 19. Communities and Local Government, 2006: Code for Sustainable Homes. HMSO, Norwich
- Ref 20. Communities and Local Government, 2007. Planning for a Sustainable Future: White Paper, May 2007
- Ref 21. Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended in 2007)
- Ref 22. Communities and Local Government, 2007: Strategic Housing Market Assessments – Practice Guidance
- Ref 23. David Couttie Associates, 2008: West Kent Strategic Housing Market Assessment.
- Ref 24. Tunbridge Wells Borough Council, 2009: Strategic Housing Land Availability Assessment
- Ref 25. Tunbridge Wells Borough Council, 2009: Landscape Character Assessment and Capacity Study
- Ref 26. Tunbridge Wells Borough Council, 2006. Local Plan (adopted March 2006).
- Ref 27. Waterman Environmental, 2007. Initial Sustainability Appraisal Briefing Note: Appraisal of spatial options for additional development (November, 2007)
- Ref 28. Tunbridge Wells Borough Council, 2008. Draft Annual Monitoring Report 2008

## Appendix A TESTING THE CORE STRATEGY OBJECTIVES AGAINST THE SA FRAMEWORK

Key	✓	Objectives are compatible
	?	Compatibility is unclear and may depend on how the objective is implemented
	X	Objectives are incompatible
	-	No obvious relationship between the objectives

Note: Commentary on the Assessment where compatibility is unclear has been provided in a table following the Assessment Matrix.

Sustainability Objective	
<b>Objective 1</b>	To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.
<b>Objective 2</b>	To improve the health and wellbeing of the population and reduce inequalities in health.
<b>Objective 3</b>	To reduce poverty and social exclusion.
<b>Objective 4</b>	To raise educational achievement across the Borough and develop the opportunities for everyone to acquire the lifetime skills needed to find and remain in work and support the long-term competitiveness of the Borough.
<b>Objective 5</b>	To reduce crime and the fear of crime.
<b>Objective 6</b>	To improve accessibility to all services and facilities, including employment, education, health services, shopping, green space, culture, leisure, recreation (CLR) facilities and a sustainable tourism sector.
<b>Objective 7</b>	To improve efficiency in land use through the reuse of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.
<b>Objective 8</b>	To reduce pollution (to land, air and soil) and maintain and improve the water quality of the Borough's rivers, and to achieve sustainable water resources management.
<b>Objective 9</b>	To address the causes of climate change through reducing emissions of greenhouse gases.
<b>Objective 10</b>	To conserve and enhance the Borough's biodiversity.
<b>Objective 11</b>	To protect, enhance and make accessible for enjoyment, the Borough's countryside and historic environment.
<b>Objective 12</b>	To improve travel choice and to reduce the need for travel, particularly by car to reduce road congestion.
<b>Objective 13</b>	To reduce the impact of resource consumption by using sustainably produced and local products and reducing waste generation and disposal.
<b>Objective 14</b>	To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough.
<b>Objective 15</b>	To ensure high and stable levels of employment so everyone can benefit from the economic growth of the Borough.
<b>Objective 16</b>	To stimulate and sustain economic growth and competitiveness across the Borough.

Note: Bold text within the following assessment matrix identifies where the appraisal has changed since Sustainability Appraisal of the Preferred Options stage.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Strategy Objectives		Sustainability Appraisal Objectives															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1.	To provide an adequate and continuous supply of land, in sustainable locations, to meet the Borough's strategic requirements for housing, employment and retail development and for other supporting infrastructure, whilst protecting and seeking to enhance the Borough's unique high-quality built and natural environment	✓	✓	✓	-	✓	✓	?	✓	-	✓	✓	✓	?	?	✓	✓
2.	To stimulate and sustain the economic growth and competitiveness of Royal Tunbridge Wells as a Regional Hub in a way that also provides business opportunities for local people. Focusing development at the Regional Hub should not prejudice the need to support the rural economy by protecting and enhancing the vitality and viability of the small rural towns, neighbourhood and village centres and wider rural area	✓	✓	✓	-	✓	✓	✓	-	✓	?	?	✓	?	-	✓	✓
3.	To target regeneration efforts where necessary to ensure that all current and future residents of the Borough have the opportunity to access the services and facilities they require to meet their needs for housing, employment, leisure, education and health.	✓	✓	✓	✓	?	✓	?	?	✓	?	✓	✓	?	?	✓	✓
4.	To facilitate the provision of enhanced infrastructure to support new and existing development, particularly where this can reduce the need to travel and encourage the use of sustainable modes of transport where travel remains necessary	-	✓	?	-	?	✓	?	✓	✓	?	?	✓	✓	✓	✓	✓

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Strategy Objectives		Sustainability Appraisal Objectives															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
5.	To provide high quality housing to meet the needs of all sectors of the community, both current and in the future, including with affordable housing, retirement accommodation, homes for young and elderly people and for those with special needs	✓	✓	✓	-	-	-	?	?	?	?	?	-	?	-	-	-
6.	The protection and provision of open space, sports, play, recreational, community and cultural facilities that are accessible to all.	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	-	-	-	-	-
7.	To promote a safe and healthy community that is inclusive of the needs of the communities that make up the Borough's population.	✓	✓	✓	-	✓	✓	-	-	-	-	-	-	-	-	✓	✓
Sus .1	To ensure that development takes account of the role and value of biodiversity and geodiversity and to aims to protect and enhance locally important habitats, wildlife and geology.	?	✓	-	-	-	✓	-	✓	✓	✓	✓	-	-	-	?	?
Sus .2	To maximise the use of previously developed land and the existing property stock	✓	-	-	-	-	?	✓	✓	✓	?	?	?	-	-	-	-
Sus .3	To conserve, wherever possible, finite non-renewable resources, including land, energy, water, soil and air quality	?	-	-	-	-	?	✓	✓	✓	-	-	✓	✓	✓	-	-
Sus .4	To ensure development has regard to the potential impacts of climate change and its long-term implications	✓	-	-	-	-	-	✓	✓	✓	✓	✓	-	✓	✓	-	-
Sus. 5	To ensure development gives full consideration to good design principles, including energy efficiency and sustainable construction	✓	-	-	-	-	-	✓	-	✓	✓	✓	-	✓	✓	-	-

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### Core Strategy Objectives Appraisal - Commentary on the Assessment where compatibility is unclear

Objective	SA Objective	Commentary
1.	7	The Objective is unclear on whether previously developed land would be prioritised (covered under Core Policy 1: Delivery of Development)
	13	Provision of a high quality built environment may not lead to the use of sustainable products and reduction in consumption (Covered under Core Policy 5: Sustainable Design).
	14	It is unclear in the Strategic Objective whether energy efficiency would be prioritised.
2.	10, 11	Compatibility with these sustainability objectives is unclear as there are a number of biodiversity and heritage designations including AONB, SSSI's, Sites of Interest to Natural Conservation Areas, Conservation Areas and Listed Buildings which could potentially be adversely affected. Development would therefore need to be sensitive to the local context and ensure these resources are not lost whilst considering potential for enhancement where possible.
	13	The reduction in resource consumption and use of sustainable products is not specified in the Strategic Objective.
3.	5	In order to comply with the SA Objective, regeneration needs to ensure that security is maximised.
	7	It is not clear that the regeneration on previously developed land would be prioritised (covered under Core Policy 7).
	8	It is not explicit that environmental resources would be protected within the regeneration efforts.
	10	Similar to the above, it is not explicit that biodiversity would be protected or enhanced with regeneration (covered under Core Policy 12).
	13	It unclear whether a reduction in resource consumption and the use of sustainable materials would be prioritised during regeneration.
	14	Similarly, it is unclear whether energy efficiency and the use of renewable energy would be prioritised with regeneration.
4.	3	It is not clear whether the transport provided in line with the Objective would be affordable and thus could lead to social exclusion.
	5	To comply with the SA Objective, infrastructure provided should be appropriately designed with sufficient security being provided.
	7	The Strategic Objective is not clear in specifying whether previously developed land would be used for infrastructure.
	10	It is not specified that infrastructure development would ensure the protection of biodiversity and the environment.
	11	It is not clear that the Borough's countryside and historic environment would be protected from infrastructure development (covered under Core Policy 4: Environment)
5.	7	The effects of meeting the housing needs are dependent on the location of the new development and it is not clear whether brownfield sites would be prioritised (covered under Sustainable Development objective 3). Housing growth should therefore seek to maximise the use of previously developed land and prioritise the reuse of materials from buildings (covered under Core Policy 1: Delivery of Development).
	8	To accord with the SA Objective, it would need to be ensured that the housing provision is sensitive to the environment and limits pollution(covered under Core Policy 4: Environment and Core Policy 5: Sustainable Design)

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Objective	SA Objective	Commentary
	9	To accord with the SA Objective, the housing would need to be of a sustainable design (covered under Core Policy 5: Sustainable Design)
	10 , 11	The effects of meeting the housing need are dependent on the location of the new development. There are a number of biodiversity and heritage designations including AONB, SSSI's, Sites of Interest to Natural Conservation Areas, Conservation Areas and Listed Buildings which could potentially be adversely affected. The location of new housing developments should therefore seek to, where possible, avoid biodiversity, heritage and landscape features and consider the potential for enhancement wherever possible.
	13	The reduction in resource consumption and use of sustainable products is not specified in the Strategic Objective (Covered under Core Policy 5: Sustainable Design)
Sus. 1	1	<b>This objective could limit the availability of sites for housing development in areas where there is a shortfall of PDL.</b>
	15 & 16	<b>This objective could restrict economic development in some areas of the Borough, should there be a shortfall of PDL available for regeneration/ redevelopment.</b>
Sus. 2	6	The effects of the Strategic Objective on accessibility would depend on the location of the development. Only land in a good location with respect to transport links should be used.
	10 & 11	As most previously developed land is located within the urban areas, the potential effects of this Core Strategy Objective on the protection of biodiversity and historic environment within urban areas as well as the effects on the countryside is unclear. However, in some circumstances biodiversity and the countryside environment may be conserved due to limiting development in the greenbelt.
	12	The effects of this Strategic Objective on reducing the need to travel, especially by car, would depend on the location of the development. Only land in a well served location should be used, or development should incorporate public transport services.
	1	Conserving land may affect the deliverability of affordable housing in the Borough.
Sus. 3	6	Similarly, conserving land may affect the provision of new development to improve accessibility within the Borough. Resources would be required to provide this improved accessibility.

**Appendix B RESULTS SUMMARY: APPRAISAL OF THE SPATIAL STRATEGY, GENERAL POLICIES AND PLACE-SHAPING POLICIES**

This table presents the long-term effects (over 10 years post completion of new development) predicted as part of the Sustainability Appraisal of the Spatial Strategy, Place-Shaping Policies and General Policies. For other effects (including short term and medium term effects), please refer to the detailed appraisal tables contained within Appendices C, D and E.

**Key to Impact Appraisal**

**Magnitude**

- ✓✓ Option has a major positive impact on the SA Objective
- ✓ Option has a minor positive impact on the SA Objective
- Option has a neutral impact on the SA Objective
- ✗ Option has a minor negative impact on the SA Objective
- ✗✗ Option has a major negative impact on the SA Objective
- ? Impact is uncertain

**Note: Bold text identifies where the appraisal has changed since Sustainability Appraisal of the Preferred Options stage.**

SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Strategy Submission Policies		Sustainability Appraisal Objectives															
		1. Housing	2. Health and Wellbeing	3. Poverty and Social Exclusion	4. Education and Training	5. Crime and the fear of crime	6. Accessibility	7. Efficiency in Land Use	8. Pollution	9. Climate Change	10. Biodiversity	11. Countryside and Historic Env.	12. Transport	13. Resource Consumption &	14. Energy	15. Employment	16. Economy
<b>Spatial Strategy</b>		✓✓	✓✓	✓✓	✓✓	✓✓	✓	✘	-	✓	✘	✘	✓	-	✓	✓✓	✓
‘General’ Policies	Core Policy 1: Delivery of Development	✓	✓	✓	✓	✓	✓	✓✓	✓	✓	?	✓	✓	✓	✓	-	-
	Core Policy 2: Green Belt	-	✓	-	-	?	✓	✓	✓	✓	✘	✘	-	-	-	-	-
	Core Policy 3: Transport Infrastructure	-	✓✓	✓	✓	✓	✓✓	✓	✓✓	✓✓	-	✓	✓	-	✓✓	✓	✓
	<b>Core Policy 4: Environment</b>	✓	✓	-	-	-	✓✓	✓✓	✓	✓	✓✓	✓✓	-	-	-	-	-
	<b>Core Policy 5: Sustainable Design and Construction</b>	✓	✓✓	✓✓	-	✓✓	✓✓	-	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	-	-
	<b>Core Policy 6: Housing Provision</b>	✓✓	✓✓	✓	✓	✓	✓	✘	✓	✓	✘	✘	✓✓	-	✓	-	✓
	Core Policy 7: Employment Provision	-	✓	✓✓	-	✓	✓✓	✓✓	-	✓	?	-	✓✓	-	✓	✓✓	✓
	Core Policy 8: Retail and Leisure Provision	-	✓	✓	✓	✓✓	✓✓	✓✓	✓	✓	?	-	✓	-	✓	✓	✓



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Strategy Submission Policies		Sustainability Appraisal Objectives															
		1. Housing	2. Health and Wellbeing	3. Poverty and Social Exclusion	4. Education and Training	5. Crime and the fear of crime	6. Accessibility	7. Efficiency in Land Use	8. Pollution	9. Climate Change	10. Biodiversity	11. Countryside and Historic Env.	12. Transport	13. Resource Consumption &	14. Energy	15. Employment	16. Economy
‘Place-Shaping’ Policies	<b>Core Policy 9: Development in Royal Tunbridge Wells</b>	✓✓	✓✓	✓✓	?	✓✓	✓✓	*	✓	✓	*	*	✓✓	-	✓	✓✓	✓✓
	<b>Core Policy 10: Development in Southborough</b>	✓	✓✓	✓✓	?	✓✓	✓✓	*	✓	✓	*	*	✓✓	-	✓	✓✓	✓✓
	<b>Core Policy 11: Development in Paddock Wood</b>	✓	✓	✓✓	?	✓	✓	*	-	✓	*	*	✓	-	✓	✓✓	✓✓
	<b>Core Policy 12: Development in Cranbrook</b>	✓	✓	✓	?	✓	✓	*	-	-	*	*	✓	-	-	✓	✓✓
	<b>Core Policy 13: Development in Hawkhurst</b>	✓	✓	✓	?	✓	✓	*	-	-	*	*	✓	-	-	✓	✓✓
	<b>Core Policy 14: Development in the Villages</b>	✓	✓✓	✓✓	✓	✓	✓	*	-	-	*	*	-	-	-	✓	✓
	<b>Core Policy 15: Development in the Rural Area</b>	✓	✓✓	✓✓	✓	-	✓	*	-	-	✓	✓	✓	✓	-	✓	✓

Appendix C TESTING THE SPATIAL STRATEGY AGAINST THE SA FRAMEWORK

Key to Impact Appraisal

Magnitude

- ✓✓ Option has a major positive impact on the SA Objective
- ✓ Option has a minor positive impact on the SA Objective
- Option has a neutral impact on the SA Objective
- × Option has a minor negative impact on the SA Objective
- ×× Option has a major negative impact on the SA Objective
- ? Impact is uncertain

Timing

- ST – Short-term (during the construction of new residential development)
- MT – Medium-term (5 to 10 years post completion of new residential development)
- LT – Long-term (Over 10 years post completion of new residential development)

- Likelihood – High, medium or low
- Scale – Local, regional, national or global
- Permanence – Temporary or permanent
- Effect – Secondary, cumulative or synergistic effects

Note: Grey shading within the appraisal tables indicates where the appraisal has been reconsidered. Bold text identifies where the appraisal has changed since Sustainability Appraisal of the Preferred Options stage.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### SA OBJECTIVE 1: TO ENSURE THAT EVERYONE HAS THE OPPORTUNITY TO LIVE IN A DECENT, SUSTAINABLY CONSTRUCTED AND AFFORDABLE HOME

#### Sub-objectives

- 1.1 Would it increase the amount of housing across the Borough to meet local needs?
- 1.2 Would it increase the supply of affordable housing both in numbers and as a proportion of total housing stock?
- 1.3 Would it reduce the percentage of unfit/non-decent homes in the Borough?
- 1.4 Would it ensure the provision of housing to serve the needs of rural areas?
- 1.5 Would it promote the adoption of sustainable design and construction practices in housing (e.g. energy/ water/ land/ materials efficiency, incorporation of biodiversity/natural assets etc)?
- 1.6 Would it promote the development of mixed communities through a range of housing sizes, types, tenures and levels of affordability to reflect changes in population?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p>Settlement Hierarchy:</p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	✓✓	✓✓	<p>The results of the Strategic Housing Land Availability Assessment (SHLAA) have confirmed that there is sufficient suitable and available land for housing and other uses to support the quantity and distribution of development (including housing development) identified in the Spatial Strategy (however this is more uncertain in the long-term). The Spatial Strategy addresses the current Regional housing allocations within the plan period and will deliver 6,000 new homes between 2006 and 2026. This will therefore have significant benefits for this objective.</p> <p>The Spatial Strategy will also direct approximately 75% of new housing development to Royal Tunbridge Wells (RTW), which has been identified as the location with the greatest housing need and the highest number of unfit homes (387 affordable homes needed – TWBC Housing Needs Survey, 2005).</p> <p>Paddock Wood (defined in the Spatial Strategy as a ‘small rural town’) has the next highest need for affordable homes in the Borough (186, Housing Needs Survey 2005). By also directing approximately 20% housing to small rural towns, the Spatial Strategy provides good opportunities for meeting local housing needs in these areas. The local needs of rural areas are also secured through the Spatial Strategy by permitting development in rural areas to meet rural exception housing needs.</p> <p>Recommendations: A range of housing sizes and types should be provided, see Core Policy 6</p> <p>Likelihood: High</p> <p>Scale: Local</p> <p>Permanence: Permanent</p> <p>Effects: New affordable housing has the potential to improve the health and wellbeing of some Borough residents and reduce poverty and social exclusion.</p>

#### General Comments/Recommendations

The 2005 Housing Needs Survey identified a need for more flats and terraced housing. Core Policy 6: Housing Provision has been informed by the results of a Strategic Housing Market Assessment (SHMA) to ensure the overall size, type (including specialist housing for the elderly) and tenure mix of housing to be sought for different parts of the Borough is appropriate to current and predicted needs.

Ensuring new developments are designed to Lifetime Homes Standards would help to address the needs of the Borough’s aging population, by making homes adaptable to meet changing family circumstances (covered under para 5.125 of Core Policy 5: Sustainable Design and Construction).

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### SA OBJECTIVE 2: TO IMPROVE THE HEALTH AND WELLBEING OF THE POPULATION AND REDUCE INEQUALITIES IN HEALTH

#### Sub-objectives

- 2.1 Would it promote healthy, active lifestyles through the protection and provision of facilities and locations of sporting/recreational activities (e.g. playing fields, sports facilities, cycleways, footpaths etc)?
- 2.2 Would it promote informal recreation through access to the countryside?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<u>Settlement Hierarchy:</u> 1. Main urban area 2. Small rural towns 3. Villages  Main Urban Area: 75% housing and 90% retail development Small Rural Towns: 20% housing and 10% retail Villages: 5% housing Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.	-	✓✓	✓✓	The Spatial Strategy would deliver new infrastructure to support health and wellbeing in areas of greatest need. The Index of Multiple Deprivation (IMD) 2004 identifies the highest levels of health deprivation and disability in some wards within RTW and Southborough ('main urban areas'), followed by wards within the small rural towns of Paddock Wood, Cranbrook and Hawkhurst ('small rural towns').  <b>Recommendations:</b> None <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Potential to reduce social exclusion.

#### General Comments/Recommendations

Within the Borough, there is generally good access to the countryside and recreational open space, as set out in the Borough's Recreation and Open Space Study. Therefore development in all locations would allow access to the countryside and informal recreation/leisure pursuits

The Borough has adequate sports/leisure facilities although some reallocation of existing uses, such as using senior pitches for junior pitches, is required to meet local needs and future projected changes to needs.

Whilst new major development is likely to result in the provision of new community, health and/or sporting facilities, care should be taken so that additional residential development does not result in healthcare and recreation/leisure facilities exceeding their capacity.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 3: TO REDUCE POVERTY AND SOCIAL EXCLUSION

#### Sub-objectives

3.1 Would it promote or support employment opportunities across the Borough for the most deprived wards?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u></p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	✓✓	✓✓	<p>The IMD (2004) identifies some wards within RTW (in particular – Sherwood) as being the most deprived in the Borough. In addition, apart from the 'Barriers to Housing and Services' domain, the IMD (2004) shows greater deprivation in rural towns rather than villages in the Borough. This Strategy would therefore direct new development to where it is needed most in order to help reduce poverty and social exclusion. In addition, providing development in areas well served by social and community services would contribute towards reducing social exclusion.</p> <p>Permitting minor infill development, redevelopment and development to meet rural exception housing needs would also help meet local needs in rural villages – the IMD (2004) identifies deprivation in terms of barriers to housing and services to be an issue for most villages in the Borough.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Potential to reduce social exclusion.</p>

#### General Comments/Recommendations

Ensure that public transport accessibility is a key consideration for the siting and scale of development.

The LDF should ensure the spatial integration of affordable housing in order to create mixed, more balanced and sustainable communities and to avoid creating pockets of social deprivation.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

**OBJECTIVE 4: TO RAISE EDUCATIONAL ACHIEVEMENT ACROSS THE BOROUGH AND DEVELOP THE OPPORTUNITIES FOR EVERYONE TO ACQUIRE THE LIFETIME SKILLS NEEDED TO FIND AND REMAIN IN WORK AND SUPPORT THE LONG-TERM COMPETITIVENESS OF THE BOROUGH**

### Sub-objectives

- 4.1 Would it increase opportunities for education/ training for everyone?  
 4.2 Would it increase opportunities to improve the level of basic skills and/ or information/ communication technology?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u>                      1. Main urban area                      2. Small rural towns                      3. Villages</p> <p>Main Urban Area: 75% housing and 90% retail development                      Small Rural Towns: 20% housing and 10% retail                      Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	✓✓	✓✓	<p>The IMD (2004) identifies the urban areas and rural towns of the Borough as having lower levels of educational achievement. This Strategy would therefore direct additional development, which may support education and training opportunities to areas with the greatest need. Larger scale development at RTW and Southborough also offers greater opportunity to deliver education and training infrastructure.</p> <p><b>Recommendations:</b> Consideration needs to be given to the capacity of existing educational facilities and public transport accessibility between villages, rural towns and urban areas to ensure all residents in the Borough have access to education and training opportunities.</p> <p><b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Potential to reduce social exclusion.</p>

### General Comments/Recommendations

The Core Strategy should take account of any likely changes to education provision by, for example, having regard to any Education Strategic Plans produced by Kent County Council (KCC).

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 5: TO REDUCE CRIME AND THE FEAR OF CRIME

#### Sub-objectives

5.1 Would it reduce crime or fear of crime through good urban design measures?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u></p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	✓	✓✓	<p>Whilst the strategic location of development would not have an effect on the levels of crime, locating new development within existing neighbourhoods would have benefits, including opportunities for:</p> <ol style="list-style-type: none"> <li>1. Natural surveillance;</li> <li>2. Regenerating the most deprived areas; and</li> <li>3. Local improvements to help reduce crime and the fear of crime.</li> </ol> <p><b>Recommendations:</b> Considerations for designing out crime would need to be incorporated into all new developments. Safe pedestrian access should be encouraged to increase the use of public spaces, which can create a reduced risk of crime through natural surveillance and a sense of safety.</p> <p>Creating the right mix of uses in an area can also lead to more surveillance more of the time. Care should be taken to ensure that the mixed uses in a locality are compatible. Diversifying the evening economy by encouraging restaurants, shops, cafes or galleries would also encourage natural surveillance in the evenings.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Positive effects by improving quality of life for people.</p>

#### General Comments/Recommendations

The design of developments would have an effect on levels of crime. Core Policy 5: Sustainable Design should ensure that safe environments are created by observing the principles of good urban and high quality design.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 6: TO IMPROVE ACCESSIBILITY TO ALL SERVICES AND FACILITIES, INCLUDING EMPLOYMENT, EDUCATION, HEALTH SERVICES, SHOPPING, GREEN SPACE, CULTURE, LEISURE, RECREATION (CLR) FACILITIES AND A SUSTAINABLE TOURISM SECTOR

#### Sub-objectives

- 6.1 Would it offer opportunities for participation in CLR activities by tourists and local people?
- 6.2 Would it provide support for CLR providers?
- 6.3 Would it promote mixed-use development with good accessibility to local facilities and services (e.g. employment, education, health services, shopping, leisure, green spaces, culture etc), that reduce the need to travel?
- 6.4 Would it ensure that facilities and services are accessible to all communities?
- 6.5 Would it ensure suitable access for people with disabilities?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><b>Settlement Hierarchy:</b></p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	✓	✓	<p>According to TWBC Accession Mapping (2007), the greatest concentration of services and facilities is within the urban areas of RTW and Southborough, followed by the small rural towns of Paddock Wood, Cranbrook and Hawkhurst. New development in these areas would therefore help to ensure accessibility to services and facilities.</p> <p>Directing approximately 20% of housing development and 10% of retail development to Cranbrook, Hawkhurst and Paddock Wood would also support and strengthen these rural towns to help secure their long-term functions as providers of employment opportunities, services and community facilities to rural villages. However, public transport would need to be improved within rural areas in the Borough to maximise benefits to rural villages.</p> <p>New tourism-related development within RTW and the rural area would benefit the borough – the spa town of RTW is a popular tourist destination.</p> <p>Recommendations: Improve public transport and encourage other sustainable modes of travel within rural areas in the Borough, covered under Core Policy 3.</p> <p>Likelihood: High Scale: Regional Permanence: Permanent</p> <p>Effects: Positive cumulative effects for reducing poverty and social exclusion, improving health and wellbeing and reducing inequalities in health, raising educational achievement in the Borough, ensuring high and stable levels of employment, stimulating and sustaining economic growth and competitiveness and reducing the need to travel.</p>

#### General Comments/Recommendations

The Core Strategy needs to ensure that new essential services and facilities are provided (where required) to meet the local needs of occupiers of new housing development (including affordable housing to meet identified local needs on rural exception sites).

Public transport accessibility needs to be a key consideration for the siting and scale of development. Enhancing public transport accessibility within the Borough would also be of benefit for creating a sustainable tourism sector; particularly to famous tourist attractions within the Borough such as Scotney Castle and Sissinghurst Castle Gardens. Core Policy 3: Transport Infrastructure should help to secure the enhancement of public transport accessibility within the Borough.



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 7: TO IMPROVE EFFICIENCY IN LAND USE THROUGH THE REUSE OF PREVIOUSLY DEVELOPED LAND AND EXISTING BUILDINGS, INCLUDING REUSE OF MATERIALS FROM BUILDINGS, AND ENCOURAGE URBAN RENAISSANCE

#### Sub-objectives

- 7.1 Would it ensure the provision of new development, including conversions on previously-developed land, as opposed to greenfield sites (in line with the sequential approach) and through conversion of existing buildings?
- 7.2 Would it encourage the reuse of materials in construction?
- 7.3 Would it require good design to create attractive, high quality environments where people would choose to live work and/or spend leisure time?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><b>Settlement Hierarchy:</b></p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	✓	✓	*	<p>Royal Tunbridge Wells and Southborough, followed by Paddock Wood, Cranbrook and Hawkhurst (respectively) have the most opportunity for the reuse of previously development land (PDL). This Strategy is therefore in accordance with the availability of PDL and would ensure efficiency in land use wherever possible.</p> <p>Nevertheless, results of the SHLAA show that, in the long-term, the more limited availability of PDL at Cranbrook and Hawkhurst and very limited PDL availability at villages may result in the need to develop on greenfield sites.</p> <p>Recommendations: None Likelihood: High Scale: Local Permanence: Permanent</p> <p>Effects: Positive cumulative effects for conserving and enhancing the Borough’s biodiversity and protecting the Borough’s countryside including Metropolitan Green Belt in the short-term. This effect will become negative in the long-term as the availability of PDL diminishes.</p>
<b>General Comments/Recommendations</b>				

Maximising the reuse of materials and quality of design would be encouraged through Core Policy 5: Sustainable Design and Construction.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 8: TO REDUCE POLLUTION (TO LAND, AIR AND SOIL) AND MAINTAIN AND IMPROVE THE WATER QUALITY OF THE BOROUGH’S RIVERS, AND TO ACHIEVE SUSTAINABLE WATER RESOURCES MANAGEMENT

#### Sub-objectives

- 8.1 Would it promote more sustainable transport patterns in all areas, particularly those of low air quality (e.g. AQMAs)?
- 8.2 Would it try to ensure that national air quality strategy objectives are not breached?
- 8.3 Would it promote compliance with river ecology standards needed to meet the requirements of the EU Water Framework Directive?
- 8.4 Would it stabilise per capita consumption (PCC) of water at current levels?
- 8.5 Would it ensure water supply and demand are in balance to maintain security of supply, where appropriate by providing new water resource infrastructure?
- 8.6 Would it separate polluting development away from sensitive receptors?
- 8.7 Would development be designed so it is less likely to cause pollution?
- 8.8 Would it prevent inappropriate development in areas at risk of flooding?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u></p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	-	-	<p>New development in the Borough will place additional pressure on existing natural resources for the Borough – in particular water resources. Careful consideration should be made to ensuring additional development will not result in future water demand exceeding supply (covered under CP5)</p> <p>Focusing the majority of development at RTW and Southborough would help to reduce the need to travel by locating housing and other types of development around existing services and facilities in an area with good public transport provision. There are pockets of poor air quality including a designated Air Quality Management Area (AQMA) along the A26. This Strategy therefore supports potential opportunities to achieve benefits through promoting sustainable transport to minimise effects on the AQMA.</p> <p>The TWBC SFRA indicates large areas to the north of Paddock Wood to be particularly vulnerable to flooding (Flood Zone 3b). Further assessment of areas falling within Flood Zone 3b is required to determine appropriate development types for these areas.</p> <p>Five Oak Green also has areas of flood risk (Flood Zone 3b) in proximity to the village boundary. In order to avoid adverse effects, development to meet rural exception needs at Five Oak Green should be avoided within these flood risk areas. This should be achieved through the implementation of Core Policy 5: Sustainable Design which expects all types of development to be located outside the Borough’s risk flood zones.</p> <p><b>Recommendations:</b></p> <p>The Development Control Policies DPD should further define flood risk zones, require Flood Risk Assessments and require appropriate Sustainable Drainage Systems.</p> <p>Careful consideration should be made to ensuring additional development will not result in future water demand exceeding supply. Consideration should also be given to the provision of new water resource infrastructure to support additional development, particularly in villages and settlements located away from major centres. Core Policy 5: Sustainable Design and Construction should help to reduce water demand by seeking to “make efficient use of water resources”.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Spatial Strategy	ST	MT	LT	Explanation and Comments
				<p><b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Effects for health and wellbeing, protecting biodiversity and the landscape and countryside.</p>

**General Comments/Recommendations**

In order to promote more sustainable transport patterns in all areas in the Borough, sustainable modes of travel (including cycling, walking and public transport) should be facilitated and/or provided in all areas – in particular within and between rural settlements where public transport provision and access to services and community infrastructure is limited. Sustainable modes of travel should be further enhanced in the urban areas of RTW and Southborough in order to address pockets of poor air quality, including a designated AQMA along the A26. Core Policy 3: Transport Infrastructure should help to achieve this by seeking “the fullest possible use of sustainable transport”.

Groundwater resources are vulnerable to contamination from direct sources (e.g. into groundwater) or indirect sources (e.g. infiltration of discharges onto land). The TWBC SFRA identifies groundwater vulnerability within the Borough based on an Environment Agency review of aquifer characteristics, local geology and the leaching of potential soils. This includes ‘moderately vulnerable’ aquifers in proximity to Royal Tunbridge Wells, Langton Green, Southborough, Paddock Wood, Speldhurst, Hawkhurst and Horsmonden. In order to minimise contamination, the Local Development Framework should require appropriate Sustainable Urban Drainage Systems (SUDS) based on groundwater availability, as identified within Table 9-2 of the TWBC SFRA. Policies should also be included which ensure that the design of development incorporates appropriate mitigation to minimise pollution and also measures to reduce water use and improve efficiency. Core Policy 5: Sustainable Design should help to achieve this by protecting the quality of, and making efficient use of, water resources. Higher densities of development provide fewer opportunities to locate development away from polluting activities.

In accordance with paragraph 3.17 of the PPS25 Practice Guide, all areas within Flood Zone 3 (as identified in the SFRA) should be considered as Flood Zone 3b unless, or until, appropriate assessment shows to the satisfaction of the Environment Agency that the area falls within Flood Zone 3a. Therefore, in all areas where the functional floodplain has not been defined and no suitable surrogate data is available, the functional floodplain (Flood Zone 3b) has been defined as the extent of Flood Zone 3a within the TWBC SFRA. Further assessment of areas falling within Flood Zone 3 will therefore be required to determine appropriate development types within these areas. Core Policy 5: Sustainable Design and Construction should ensure that all types of development be located outside the Borough’s flood risk zones, produce no negative effects on existing flood patterns and apply mitigation measures to reduce potential flood risk.

In addition to groundwater vulnerability, the Environment Agency defines groundwater Source Protection Zones (SPZs) to protect areas of groundwater that are used for potable supply, or for the use in the production of commercial food and drinks. The TWBC SFRA identifies locations within the Borough which fall within SPZs (section 9.6.2), including SPZs in proximity to the settlements of Pembury; Matfield; and Goudhurst. In order to minimise contamination, the Local Development Framework should therefore consider restrictions on the types of SUDS appropriate to certain areas, depending on the nature of the proposed development and the location of the development site with regards to SPZs. The allocation of new industrial sites (and other potential polluters) should also be situated away from these areas.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 9: TO ADDRESS THE CAUSES OF CLIMATE CHANGE THROUGH REDUCING EMISSIONS OF GREENHOUSE GASES

#### Sub-objectives

- 9.1 Would it require that development proposals are guided by 'climate proofing' principles (to allow an increase in use of renewable energies in the future)?
- 9.2 Would it reduce greenhouse gas emissions from domestic, commercial or industrial sources?
- 9.3 Would it prevent an increased risk of flooding?

For an appraisal regarding flood risk, please refer to the appraisal results for SA Objective 8.

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u></p> <p>1. Main urban area</p> <p>2. Small rural towns</p> <p>3. Villages</p> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Focusing the majority of development at the main urban areas of RTW and Southborough in the first instance would therefore offer the greatest opportunity for the delivery of renewable technologies. However, the size and type of development as well as heritage, landscape and amenity constraints may restrict this potential. Directing the majority of development within the main urban areas should also help to reduce greenhouse gas emissions through a reduced need to travel by private vehicle.</p> <p><b>Recommendations:</b> Contributions could be required for smaller-scale development where on-site provision is not feasible. Development in rural areas should also be supported by public transport improvements in order to avoid an increase in private vehicle use, which would result in an increase in greenhouse gas emissions.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Global</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>

#### General Comments/Recommendations

Core Policy 5 encourages low carbon and renewable sources of energy to provide high levels of energy efficiency. The LDF should also consider the setting of Code for Sustainable Homes targets for the design of dwellings.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 10: TO CONSERVE AND ENHANCE THE BOROUGH’S BIODIVERSITY

#### Sub-objectives

- 10.1 Would it protect, enhance and restore the Borough’s national and local designated sites?
- 10.2 Would it protect, enhance and restore the Local Biodiversity Action Plan’s priority habitats and species, and ensure the delivery of local biodiversity targets?
- 10.3 Would it encourage the development of new biodiversity assets and linkage to existing habitats within/alongside developments?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><b>Settlement Hierarchy:</b></p> <p>1. Main urban area</p> <p>2. Small rural towns</p> <p>3. Villages</p> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	?	?	*	<p>The Spatial Strategy would deliver the majority of development on PDL, which should help to conserve the majority of the Borough’s existing biodiversity.</p> <p>Nevertheless, some areas of good urban ecology exist in these areas including a number of locally and regionally significant sites and the resultant effects on these sites as result of new development is uncertain. In addition, the SHLAA shows that development (albeit more limited) within small rural towns and villages in the Borough may involve the development of greenfield sites in the long-term, some of which are located in or near the Borough’s local, regional or national designated sites. Important designations in the Borough include international Sites of Special Scientific Interest (SSSI), Local Nature Reserves and Local Wildlife Sites.</p> <p>In order to avoid adverse effects on nearby European Sites (in particular Ashdown Forest), the LDF should also ensure that the recommendations of the full Appropriate Assessment Report completed in 2009 are adopted.</p> <p>Recommendations: Adopt Appropriate Assessment recommendations (see general recommendations below).</p> <p>Likelihood: High.</p> <p>Scale: Potentially international if SSSIs are affected</p> <p>Permanence: Permanent, potentially irreversible</p> <p>Effects: Cumulative effects for protecting the Borough’s countryside and historic environment and improving efficiency in land use.</p>

#### General Comments/Recommendations

Site allocations need to give careful consideration to the landscape and biodiversity sensitivities of the Borough and its settlements. Further analysis of both of these values should be undertaken at the site allocations stage of the LDF.

In order to avoid potential adverse effects on nearby European Sites (in particular Ashdown Forest), the Appropriate Assessment undertaken in 2009 by Scott Wilson recommends that TWBC should monitor progress of the ongoing assessment and recreational management studies being undertaken by Wealden District Council on the Ashdown Forest SAC/SPA and be prepared to participate in any collaborative cross authority management plan or associated scheme that may ultimately be developed from these studies. Any such measures would need to be applied by TWBC through incorporated into future DPDs or SPDs.

In addition, the Appropriate Assessment identifies that if the increase in population resulting from the delivery of 6,000 new homes within the District would reduce the ratio of accessible natural greenspace to population, then new areas of accessible greenspace would need to be identified and delivered at a minimum rate of 1ha/1000 new population (this being Natural England’s Accessible Natural Greenspace Standard).

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

**OBJECTIVE 11: TO PROTECT, ENHANCE AND MAKE ACCESSIBLE FOR ENJOYMENT, THE BOROUGH’S COUNTRYSIDE AND HISTORIC ENVIRONMENT**

**Sub-objectives**

- 11.1 Would it protect, enhance or restore the Borough's natural environmental assets and attractive countryside (e.g. the Green Belt, parks and green spaces, common land, woodland and forests, AONBs, geological assets, etc)
- 11.2 Would it protect, enhance or restore the Borough's cultural and heritage assets (e.g. SAMs, Listed Buildings, Historic Parks and Gardens, Conservation Areas etc)?
- 11.3 Would it promote the accessibility of the Borough’s countryside and historic environment in sustainable and well-managed ways?
- 11.4 Would it significantly affect the quality of landscapes, in the Countryside or in more urban settings?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><b><u>Settlement Hierarchy:</u></b>                      1. Main urban area                      2. Small rural towns                      3. Villages</p> <p>Main Urban Area: 75% housing and 90% retail development                      Small Rural Towns: 20% housing and 10% retail                      Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	-	*	<p><b>The Strategic Housing Land Availability Assessment shows that, in the long-term, the limited availability of PDL in some areas of the Borough may result in the need to develop on greenfield sites, which in the long-term could adversely impact the Borough’s countryside and historic environment.</b></p> <p>Notwithstanding this, the TWBC Landscape Character Assessment and Capacity Study identifies the potential for future expansion of some greenfield areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook without causing adverse effects for the Borough’s countryside or historic environment, provided that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p> <p><b>Recommendations:</b> Mitigation measures identified in the TWBC Landscape Character Assessment and Capacity Study should be incorporated within the LDF.</p> <p><b>Likelihood:</b> High  <b>Scale:</b> Potential national if AONBs are affected.  <b>Permanence:</b> Permanent  <b>Effects:</b> Effects for conserving biodiversity and improving efficiency in land use.</p>

**General Comments/Recommendations**

Core Policy 4: Environment seeks to protect and enhance landscape character, including national and local designations. The High Weald Area of Outstanding Natural Beauty (AONB) is a national designation and represents one of the nation’s finest landscapes. The High Weald AONB should therefore be afforded the highest level of protection.

The siting of development within settlements will need careful consideration at the Allocations DPD stage should any new development site be proposed.

The Borough generally has good access to the countryside and historic environment.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 12: TO IMPROVE TRAVEL CHOICE AND TO REDUCE THE NEED FOR TRAVEL, PARTICULARLY BY CAR/LORRY TO REDUCE ROAD CONGESTION

#### Sub-objectives

12.1 Would it promote more sustainable travel, particularly in areas with high congestion?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u></p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	✓	✓	<p>The TWBC 2007 Accession Mapping Study identifies the main urban areas of RTW and Southborough as being the most accessible (in terms of both public transport and access to services and facilities) in the Borough. Therefore focusing the majority of development at these areas would have benefits for reducing the need to travel and improving travel choice. Improving access to, from, and within RTW and Southborough would also support RTW and Southborough's role as a Regional Hub with Tonbridge.</p> <p>Accessibility modelling identifies the small rural towns to have good access to key services and facilities. The rural town of Paddock Wood also has good direct links to Tonbridge, Ashford and Maidstone. Development in Paddock Wood would therefore capitalise on existing public transport infrastructure, whilst development at Cranbrook and Hawkhurst would secure their roles as rural service and facility providers to villages within the Borough.</p> <p><b>Recommendations:</b> It is essential that sustainable transport options are improved within rural areas to make Cranbrook and Hawkhurst more accessible to the wider rural area. Refer to Core Policy 3: Transport Infrastructure</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Regional</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Effects for improving accessibility to all services and facilities, reducing poverty and social exclusion and improving health and wellbeing.</p>

#### General Comments/Recommendations

None.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 13: TO REDUCE THE IMPACT OF RESOURCE CONSUMPTION BY USING SUSTAINABLY PRODUCED AND LOCAL PRODUCTS AND REDUCING WASTE GENERATION AND DISPOSAL

#### Sub-objectives

- 13.1 Would it promote the use of sustainably-sourced, and recycled, materials in construction and renovation?
- 13.2 Would it increase efficiency in water (e.g. water meters), energy and raw materials use?
- 13.3 Would it increase prevention, reuse, recovery and recycling of waste?
- 13.4 Would it promote sustainable waste management practices through the provision of a range of appropriate waste management facilities?
- 13.5 Would it reduce use of non-renewable resources?
- 13.6 Would it increase use of renewable energies?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<u>Settlement Hierarchy:</u> 1. Main urban area 2. Small rural towns 3. Villages  Main Urban Area: 75% housing and 90% retail development Small Rural Towns: 20% housing and 10% retail Villages: 5% housing  Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.	-	-	-	Reducing resource consumption should be required through sustainable design and construction policies.

#### General Comments/Recommendations

Core Policy 5: Sustainable Design and Construction identifies that new development will need to be inherently sustainable through the whole development process of location, design, specification, sourcing and construction.

Existing waste and recycling facilities include a recycling facility located on Longfield Road to the north east of RTW. These facilities accept both household and commercial waste including hazardous waste. There are no active existing landfill sites within the Borough.

Core Policy 5: Sustainable Design and Construction seeks to make efficient use of water and energy resources and promote sustainable waste management practices.



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 14: TO INCREASE ENERGY EFFICIENCY, AND THE PROPORTION OF ENERGY GENERATED FROM RENEWABLE SOURCES IN THE BOROUGH

#### Sub-objectives

- 14.1 Would it increase efficiency in energy use?
- 14.2 Would it provide for the establishment of renewable energy developments?
- 14.3 Would it promote the incorporation of small-scale renewables (e.g. photovoltaic cells and Combined Heat and Power Plants) in developments?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u></p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Focusing the majority of development at the main urban areas of RTW and Southborough in the first instance would therefore offer the greatest opportunity for delivery of renewable technologies.</p> <p>Some renewable options may be restricted by heritage and local amenity constraints within the Borough. Some smaller scale sites may also limit the potential to trigger the threshold for the inclusion of renewable facilities.</p> <p>Morphological constraints also may restrict some development options within urban sites, which may limit the ability to maximise natural heat and light gained through orientation.</p> <p>Within rural areas, increased landscape and Green Belt constraints may limit renewable options.</p> <p><b>Recommendations:</b> The LDF should consider contributions towards the provision of offsite renewables or community heating schemes from developments unable to deliver onsite renewables due to morphological or landscape/heritage constraints.</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for addressing the causes of climate change, reducing poverty and social exclusion and ensuring everyone has the opportunity to live in a decent, sustainably constructed and affordable home.</p>

#### General Comments/Recommendations

Core Policy 5: Sustainable Design and Construction promotes low carbon and renewable sources of energy to provide high levels of energy efficiency. Priority should first be given to reducing energy demand through, for example, reducing consumption through behavioural change, improving insulation, incorporating passive heating and cooling and installing energy efficient lighting and appliances).

Design standards of new developments (for example within the Borough Wide Development Policies Development Plan Document) should be considered to enforce this. Reference should be made to the Code for Sustainable Homes and BREEAM in the setting of targets for residential and commercial developments.

The existing trigger (as identified in the TWBC Renewable Energy Supplementary Planning Document) to provide at least 10% of a development's energy demand from renewable sources is for development of 10 dwellings or over and for commercial schemes of more than 1000m<sup>2</sup>. The scale of development is therefore important in delivering renewable energy aspirations.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 15: TO ENSURE HIGH AND STABLE LEVELS OF EMPLOYMENT SO EVERYONE CAN BENEFIT FROM THE ECONOMIC GROWTH OF THE BOROUGH

#### Sub-objectives

15.1 Would it provide employment opportunities that match the skills of the local workforce?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u>                      1. Main urban area                      2. Small rural towns                      3. Villages</p> <p>Main Urban Area: 75% housing and 90% retail development                      Small Rural Towns: 20% housing and 10% retail                      Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	✓	✓✓	✓✓	<p>The Index of Multiple Deprivation (2004) shows higher rates of unemployment in wards within RTW followed by Southborough and Hawkhurst. Directing the majority of development at RTW and Southborough and allowing some redevelopment at Hawkhurst should help to address existing unemployment levels in these areas.</p> <p>Directing a small amount of development to Cranbrook would also secure its role as a rural employment provider, whilst some development at Paddock Wood would capitalise upon opportunities to improve the quality of employment stock offered locally and help to meet the needs of businesses with larger space requirements within the Borough.</p> <p>New development would also provide construction jobs in the short-term.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for stimulating and sustaining economic growth and reducing poverty and social exclusion.</p>

#### General Comments/Recommendations

There is a need to ensure the retention of existing employment uses to prevent loss to housing and other uses. Small-scale affordable start-up units should also be encouraged. Public transport accessibility should be improved across the Borough to make employment opportunities easier to access – this is addressed through Core Policy 3: Transport Infrastructure.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 16: TO STIMULATE AND SUSTAIN ECONOMIC GROWTH AND COMPETITIVENESS ACROSS THE BOROUGH

#### Sub-objectives

16.1 Would it maintain/increase the opportunities for local employment across the Borough?

16.2 Would it sustain the vitality and viability of the village?

Spatial Strategy	ST	MT	LT	Explanation and Comments
<p><u>Settlement Hierarchy:</u></p> <ol style="list-style-type: none"> <li>1. Main urban area</li> <li>2. Small rural towns</li> <li>3. Villages</li> </ol> <p>Main Urban Area: 75% housing and 90% retail development</p> <p>Small Rural Towns: 20% housing and 10% retail</p> <p>Villages: 5% housing</p> <p>Existing employment land will be maintained and the position reviewed in light of the forthcoming partial review of the South East Plan.</p>	✓	✓✓	✓✓	<p>Stimulating the economic development of the Regional Hub (RTW and Tonbridge) would maximise borough-wide economic benefits by strengthening the economic growth of the Borough in the long-term and also ensure the ongoing competitiveness of RTW in the region.</p> <p>Development at Paddock Wood would secure the vitality and viability of the town by: maximising opportunities to improve the quality of the local employment stock; and providing new economic development in a well connected area that offers scope to meet larger space requirements.</p> <p>This Strategy would also help to meet rural needs by strengthening the role of Cranbrook and Hawkhurst as rural service centres.</p> <p><b>Recommendations:</b> A night time economy including venues such as restaurants and theatres are supported in the Sustainable Communities Plan and this needs to be reflected in the Core Strategy (covered in the justification text for CP9: Development in Royal Tunbridge Wells and CP12: Development in Cranbrook).</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Regional</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.</p>

#### General Comments/Recommendations

None.

**Appendix D      TESTING THE GENERAL POLICIES AGAINST THE SA  
FRAMEWORK**

**Key to Impact Appraisal**

**Magnitude**

- ✓✓      Option has a major positive impact on the SA Objective
- ✓      Option has a minor positive impact on the SA Objective
- Option has a neutral impact on the SA objective
- ×      Option has a minor negative impact on the SA Objective
- ××      Option has a major negative impact on the SA Objective
- ?      Impact is uncertain

**Timing**

- ST – Short-term (during the construction of new residential development)
- MT – Medium-term (5 to 10 years post completion of new residential development)
- LT – Long-term (Over 10 years post completion of new residential development)

- Likelihood** - High, Medium or Low
- Scale** – Local, regional, national or global
- Permanence** – Temporary or permanent
- Effect**– Secondary, cumulative or synergistic effects

**Note:** Grey shading within the appraisal tables indicates where the appraisal has been reconsidered. Bold text identifies where the appraisal has changed since Sustainability Appraisal of the Preferred Options stage.

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

**SA OBJECTIVE 1. TO ENSURE THAT EVERYONE HAS THE OPPORTUNITY TO LIVE IN A DECENT, SUSTAINABLY CONSTRUCTED AND AFFORDABLE HOME**

**Sub-objectives**

- 1.1 Will it increase the amount of housing across the Borough to meet local needs?
- 1.2 Will it increase the supply of affordable housing both in numbers and as a proportion of total housing stock?
- 1.3 Will it reduce the percentage of unfit/non-decent homes in the Borough?
- 1.4 Will it ensure the provision of housing to serve the needs of rural areas?
- 1.5 Will it promote the adoption of sustainable design and construction practices in housing (e.g. energy/ water/ land/ materials efficiency, incorporation of biodiversity/natural assets etc)?
- 1.6 Will it promote the development of mixed communities through a range of housing sizes, types, tenures and levels of affordability to reflect changes in population?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>The re-use of previously developed land and buildings will have benefits for SA sub-objective 1.5 (promoting sustainable design and construction practices in housing) by ensuring land and/or materials efficiency.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Positive cumulative effects for conserving and enhancing the Borough’s biodiversity and protecting the Borough’s countryside including Metropolitan Green Belt.</p>
Core Policy 2: Green Belt	-	-	-	<p>This Policy seeks to protect openness and prevent urban sprawl. The maintenance of these areas would ensure people can live in close proximity to open areas. Housing is addressed through Core Policy 6.</p>
Core Policy 3: Transport Infrastructure	-	-	-	<p>This Policy seeks to focus new transport and infrastructure provision. Housing Provision is addressed through Core Policy 6.</p>
Core Policy 4: Environment	-	✓	✓	<p>This Policy will have benefits for SA sub-objective 1.5 (promoting sustainable design and construction practices in housing) through preserving, protecting and/or enhancing the historic built environment and through protecting and/or enhancing rural and urban landscapes, townscapes, the historic natural landscape and areas of biodiversity value.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
Core Policy 5: Sustainable Design	-	✓	✓	<p><b>This Policy will have benefits for SA sub-objective 1.5 (promoting sustainable design and construction practices in housing) through helping to promote water and energy efficiency, optimising resource use and maximising the potential for waste reduction and recycling. In addition, the policy promotes high quality design including creating safe, accessible and adaptable environments.</b></p> <p><b>Recommendations:</b></p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<ul style="list-style-type: none"> <li>In line with the waste hierarchy identified in PPS11, include the concepts of ‘reuse’ and ‘recovery’ within point number 5, so that it reads “<i>maximise potential for waste reduction, reuse, recycling and recovery</i>”.</li> </ul> <p>Likelihood: Medium.                      Scale: Global                      Permanence: Permanent                      Effects: Cumulative effects for reducing pollution and the need for travel, reducing the impact of resource consumption, increasing energy efficiency, protecting the Borough’s countryside and historic environment and addressing the causes of climate change.</p>
Core Policy 6: Housing Provision	-	✓✓	✓✓	<p>The results of the Strategic Housing Land Availability Assessment (SHLAA) have confirmed that there is sufficient suitable and available land for housing and other uses to support the quantity and distribution of development (including housing development) required (6,000 new homes between 2006 and 2026) (however this is more uncertain in the long-term). This will therefore have significant benefits for this objective.</p> <p>This Policy will help meet local housing needs with regards to the provision of affordable housing and house sizes, types (including specialist housing for the elderly) and tenure mix.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>Adopt a ‘pepper-pot’ approach for the spatial integration of affordable housing to promote the development of mixed and balanced communities.</li> </ul> <p>Likelihood: High                      Scale: Local                      Permanence: Permanent                      Effects: New affordable housing has the potential to improve the health and wellbeing of some Borough residents and reduce poverty and social exclusion.</p>
Core Policy 7: Employment Provision	-	-	-	This Policy seeks to focus new employment provision. Housing Provision is addressed through Core Policy 6.
Core Policy 8: Retail and Leisure Provision	-	-	-	This Policy seeks to focus new retail and leisure provision. Housing Provision is addressed through Core Policy 6.

**General Comments/Recommendations**

Consider adopting a Code for Sustainable Homes target within the Development Control Policies DPD to require new homes to achieve high sustainable design and construction standards.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### SA OBJECTIVE 2. TO IMPROVE THE HEALTH AND WELLBEING OF THE POPULATION AND REDUCE INEQUALITIES IN HEALTH

#### Sub-objectives

- 2.1 Will it promote healthy, active lifestyles through the protection and provision of facilities and locations of sporting/recreational activities (e.g. playing fields, sports facilities, cycleways, footpaths etc)?
- 2.2 Will it promote informal recreation through access to the countryside?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>Given that the majority of previously developed land is located within the main urban areas of the Borough, this Policy will have benefits for health and wellbeing by locating the majority of new development in areas with good access to public transport, services and facilities.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for conserving biodiversity, protecting the Borough's countryside and improving accessibility.</p>
Core Policy 2: Green Belt	-	✓	✓	<p>This Policy will benefit wellbeing by preserving the openness of green spaces in the form of the Metropolitan Green Belt, and safeguarding the countryside from encroachment (presuming these areas are used for recreational enjoyment).</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting the Borough's countryside and biodiversity.</p>
Core Policy 3: Transport Infrastructure	-	✓	✓✓	<p>Encouraging sustainable modes of transport including cycling and walking will help to promote healthy, active lifestyles. Facilitating increased use of the rural lanes network for cycling, walking and horse riding will also help to promote informal recreation through access to the countryside.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing pollution and the need for travel.</p>
Core Policy 4: Environment	-	✓	✓	<p>This Policy will benefit health and wellbeing by protecting or enhancing biodiversity, the historic environment countryside for the continued enjoyment of Borough residents, workers and visitors.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for the reuse of previously developed land</p>
Core Policy 5: Sustainable Design	-	✓✓	✓✓	<p>This Policy will have significant health and wellbeing benefits by reducing the risk of flooding. Improving air quality and protecting the quality of water resources will also have direct health and wellbeing benefits. Managing and seeking to reduce pollution levels will also</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>have direct health benefits.</p> <p>The Policy will also have benefits by encouraging well designed places which provide a safe environment, create an environment that is easy for all to move within and improve legibility and sense of place. This Policy also seeks to improve the usability and function of buildings, spaces and places for people.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing pollution and the need for travel, reducing the impact of resource consumption and increasing energy efficiency.</p>
Core Policy 6: Housing Provision	-	✓✓	✓✓	<p>This Policy will seek to prioritise the delivery of the majority of new housing in main urban areas where the greatest need of affordable housing has been identified and in areas with good accessibility to sporting/recreational activities and other essential services such as healthcare.</p> <p>The provision of affordable new housing in accordance with local housing needs will have significant benefits for improving the health and wellbeing of residents of the Borough of Tunbridge Wells.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> New affordable housing will ensure everyone has the opportunity to live in a decent, sustainably constructed and affordable home and help to reduce poverty and social exclusion.</p>
Core Policy 7: Employment Provision	-	✓	✓	<p>This Policy will have benefits for health and wellbeing by increasing the provision of new job opportunities within the Borough, improving the quality of employment and improving working environments.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving accessibility to services and facilities and reducing poverty and social exclusion.</p>
Core Policy 8: Retail and Leisure Provision	-	✓	✓	<p>This Policy will have benefits for health and wellbeing of Borough residents and workers by resisting the loss of community facilities, including retail, and supporting the provision of such facilities where they are deficient.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving accessibility to services and facilities and reducing poverty and social exclusion.</p>

### General Comments/Recommendations

None.



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 3. TO REDUCE POVERTY AND SOCIAL EXCLUSION

#### Sub-objectives

3.1 Will it promote or support employment opportunities across the Borough for the most deprived wards?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>Given that the majority of previously developed land is located within the main urban areas of the Borough, this Policy will have benefits for reducing social exclusion by locating new development in areas with good access to public transport, services and facilities.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing.</p>
Core Policy 2: Green Belt	-	-	-	<p>This Policy seeks to protect openness and prevent urban sprawl. Reducing poverty and social exclusion by promoting or supporting employment opportunities is addressed through Core Policy 7</p>
Core Policy 3: Transport Infrastructure	-	✓	✓	<p>Encouraging sustainable modes of transport including cycling, walking and public transport should help to facilitate access for all. Positive effects could be maximised by ensuring public transport is affordable to all, and by closing existing gaps and offering a range of sustainable modes to cater for all.</p> <p><b>Recommendations:</b> Ensure public transport is affordable to all.  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing pollution and the need for travel</p>
Core Policy 4: Environment	-	-	-	<p>The Policy seeks to protect the Borough's natural and historic environment. Reducing poverty and social exclusion by promoting or supporting employment opportunities is addressed through Core Policy 7.</p>
Core Policy 5: Sustainable Design	-	✓✓	✓✓	<p><b>The Policy will have benefits by encouraging well designed places which provide a safe environment, create an environment that is easy for all to move within and improve legibility and sense of place. This Policy will also help to reduce social exclusion through requiring housing development to meet Lifetime Homes and Building for Life standards (para 5.125).</b></p> <p><b>The Policy no longer makes reference to delivering sustainable transport (covered under CP3). More detailed policies and/or guidance is required in order to ensure that Core Policy 5 are successfully implemented.</b></p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Reinststate the policy requirement to deliver sustainable transport.</li> <li>• More detailed policies and/or guidance is required in order to ensure the objectives of Core Policy 5 are successfully implemented.</li> </ul> <p><b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving health and wellbeing.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 6: Housing Provision	-	✓	✓	<p>The Index of Multiple Deprivation (IMD) (2004) identifies wards within Royal Tunbridge Wells (in particular- Sherwood) as the most deprived in the Borough. In addition, apart from the 'Barriers to Housing and Services' domain, the IMD (2004) shows greater deprivation in rural towns than villages in the Borough. This Policy would therefore direct new affordable homes to where they are needed most in order to help reduce poverty and social exclusion.</p> <p>This Policy will also deliver the majority of new housing in areas with good accessibility to public transport and essential services and infrastructure including employment.</p> <p>However, the Core Strategy should ensure that new affordable housing is not delivered in 'clusters' so as to avoid creating pockets of social deprivation.</p> <p><b>Recommendations:</b> Ensure affordable homes as spatially integrated within new housing developments to promote the development of mixed and balanced communities.</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> New affordable housing will ensure everyone has the opportunity to live in a decent, sustainably constructed and affordable home and will help to improve health and wellbeing.</p>
Core Policy 7: Employment Provision	-	✓✓	✓✓	<p>This Policy will have significant benefits for reducing social exclusion by increasing the provision of new job opportunities within the Borough.</p> <p><b>Recommendations:</b> None</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving accessibility to services and facilities and improving health and wellbeing.</p>
Core Policy 8: Retail and Leisure Provision	-	✓	✓	<p>This Policy will have benefits for reducing social exclusion by resisting the loss of community facilities, including retail, and supporting the provision of such facilities in centres and where they are deficient.</p> <p><b>Recommendations:</b> None</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving accessibility to services and facilities and improving health and wellbeing.</p>

### General Comments/Recommendations

None.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 4. TO RAISE EDUCATIONAL ACHIEVEMENT ACROSS THE BOROUGH AND DEVELOP THE OPPORTUNITIES FOR EVERYONE TO ACQUIRE THE LIFETIME SKILLS NEEDED TO FIND AND REMAIN IN WORK AND SUPPORT THE LONG-TERM COMPETITIVENESS OF THE BOROUGH

#### Sub-objectives

- 4.1 Will it increase opportunities for education/ training for everyone?  
4.2 Will it increase opportunities to improve the level of basic skills and/ or information/ communication technology?

Preferred Options	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>By prioritising development on PDL, development will be focussed within the urban areas of Royal Tunbridge Wells and Southborough. This Policy will therefore have benefits by directing the majority of new housing to areas with good provision of education and training facilities.</p> <p><b>Recommendations:</b> Consideration needs to be given to the capacity of existing educational facilities and public transport accessibility between villages, rural towns and urban areas to ensure all residents in the Borough (new and existing) have good access to education and training opportunities.</p> <p><b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for reducing social exclusion, improving health and wellbeing.</p>
Core Policy 2: Green Belt	-	-	-	<p>This Policy seeks to protect openness and prevent urban sprawl. Raising educational achievement across the Borough should be addressed through other Policies, such as Core Policy 8.</p>
Core Policy 3: Transport Infrastructure	-	✓	✓	<p>Continuing to develop and provide an integrated cycle network, enhance pedestrian routes and encourage improvements and the provision of different forms of public transport will have benefits for ensuring everyone has access to existing education/training infrastructure.</p> <p><b>Recommendations:</b> None <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for improving accessibility to services and facilities, reducing social deprivation and improving health and wellbeing.</p>
Core Policy 4: Environment	-	-	-	<p>This Policy seeks to protect the Borough's natural and historic environment. Raising educational achievement across the Borough should be addressed through other Policies, such as Core Policy 8.</p>
Core Policy 5: Sustainable Design	-	-	-	<p>This Policy encourages sustainable design and construction within developments. Raising educational achievement across the Borough should be addressed through other Policies, such as Core Policy 8.</p>
Core Policy 6: Housing Provision	-	✓	✓	<p>This Policy will direct the majority of new housing to Royal Tunbridge Wells and Southborough, which have good provision of education and training facilities.</p> <p><b>Recommendations:</b> Consideration needs to be given to the capacity of existing educational facilities all residents in the Borough (new and existing) have good access to education and training opportunities.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Preferred Options	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b>  <b>Effects:</b> Cumulative effects for reducing social exclusion, improving health and wellbeing.</p>
Core Policy 7: Employment Provision	-	-	-	<p>This Policy does not consider opportunities for increasing education/training for everyone as part of employment provision. Where feasible, the Core Strategy or Development Control Policies DPD could consider encouraging developers of major development proposals (particularly for those located in RTW with existing levels of social deprivation) to enter into local labour agreements with the Council to (for example):</p> <ul style="list-style-type: none"> <li>• Secure contributions from developers towards the costs of training local people; or</li> <li>• Enable local people access to jobs, apprenticeships or job placements in the construction and/or end use phases of developments in order to meet the wider needs of the community.</li> </ul> <p><b>Recommendations:</b> Where feasible, consider encouraging Local labour agreements between developers of major developments and the Council, particularly for new developments to be located within areas of existing social deprivation.</p> <p><b>Likelihood:</b> High  <b>Scale:</b>Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing social deprivation and improving health and wellbeing</p>
Core Policy 8: Retail and Leisure Provision	-	✓	✓	<p>This Policy will seek maintain and improve the quantity, quality and accessibility of community facilities (including educational facilities) where appropriate. The Policy will also resist, as far as practicable, the loss of community facilities.</p> <p><b>Recommendations:</b> None. See general comments below.</p> <p><b>Likelihood:</b> Uncertain  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing social exclusion and improving health and wellbeing.</p>

**General Comments/Recommendations**

No policy within the Core Strategy explicitly addresses the need to raise educational achievement across the Borough or to develop opportunities for everyone to acquire the lifetime skills needed to find and remain in work.

The current trend of out-commuting of the Borough’s highly skilled workforce, coupled with generally low paid jobs in leisure, tourism, business tourism and retailing (which are presently sustaining the local economy) and the effects of an ageing population could lead to future labour shortages. It is therefore important that all members of the community have access to opportunities to acquire the lifetime skills needed to find and remain in work, which will also have benefits for supporting the long-term competitiveness of the Borough.

# SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

## OBJECTIVE 5 TO REDUCE CRIME AND THE FEAR OF CRIME

### Sub-objectives

5.1 Will it reduce crime or fear of crime through good urban design measures?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>By focusing development on PDL, most new developments will be located within existing urban areas and neighbourhoods. This has the following benefits:</p> <ul style="list-style-type: none"> <li>• Opportunities for natural surveillance;</li> <li>• Opportunities for regenerating the most deprived areas;</li> <li>• Opportunities for local improvements to help reduce crime and the fear of crime.</li> </ul> <p><b>Recommendations:</b> None  <b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving health and wellbeing and reducing social exclusion</p>
Core Policy 2: Green Belt	-	?	?	<p>Uninhabited areas of Green Belt could present places for opportunities for crime.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> Uncertain  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing and social exclusion.</p>
Core Policy 3: Transport Infrastructure	-	✓	✓	<p>This Policy will have benefits by ensuring public transport links in rural areas of the Borough area are convenient and safe for users.</p> <p><b>Recommendations:</b> This Policy should ensure that footpaths, cycleways and public transport infrastructure such as bus stops and train stations are convenient and safe for users across the whole Borough, not just for rural areas.  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving health and wellbeing and reducing social exclusion.</p>
Core Policy 4: Environment	-	-	-	<p>This Policy seeks to protect the Borough's natural and historic environment. Reducing crime and the fear of crime through good urban design measures is addressed through Core Policy 5.</p>
Core Policy 5: Sustainable Design	-	✓	✓✓	<p>This Policy would help to reduce crime and the fear of crime by requiring high-quality design to create safe, accessible, legible and adaptable environments. In addition, the policy also seeks to protect and enhance public realm, which should help to reduce crime and fear of crime.</p> <p><b>Recommendations:</b> None.  <b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving health and wellbeing and reducing social exclusion.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 6: Housing Provision	-	✓	✓	<p>The sequential approach to identify land for housing development should result in a significant proportion of new housing being located within existing neighbourhoods. This has the following benefits:</p> <ul style="list-style-type: none"> <li>• Opportunities for natural surveillance;</li> <li>• Opportunities for regenerating the most deprived areas;</li> <li>• Opportunities for local improvements to help reduce crime and the fear of crime.</li> </ul> <p><b>Recommendations:</b> Adopt a ‘pepper-pot’ approach for the distribution of new affordable housing in order to avoid creating pockets of social deprivation which can create or exacerbate crime and the fear of crime.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving health and wellbeing and reducing social exclusion</p>
Core Policy 7: Employment Provision	-	✓	✓	<p>Successful implementation of this Policy will have benefits for ensuring the vitality and viability of town and rural centres and supporting the long-term competitiveness of the Borough. This will have benefits for reducing crime and the fear of crime.</p> <p><b>Recommendations:</b> None</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving health and wellbeing and reducing social exclusion</p>
Core Policy 8: Retail and Leisure Provision	-	✓✓	✓✓	<p>The provision of new retail, leisure and other town centre uses at centres in the Borough will help to ensure the vitality and viability of town, village and neighbourhood centres within the Borough. This, coupled with improving the quality of open spaces, will have positive effects for reducing crime and the fear of crime.</p> <p><b>Recommendations:</b> None</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving health and wellbeing and reducing social exclusion</p>

### General Comments/Recommendations

The Core Strategy should consider diversifying the evening economy through the development of more restaurants, shops, cafes, galleries or museums, which would provide natural surveillance in the evenings.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 6 - TO IMPROVE ACCESSIBILITY TO ALL SERVICES AND FACILITIES, INCLUDING EMPLOYMENT, EDUCATION, HEALTH SERVICES, SHOPPING, GREEN SPACE, CULTURE, LEISURE, RECREATION (CLR) FACILITIES AND A SUSTAINABLE TOURISM SECTOR

#### Sub-objectives

- 6.1 Will it offer opportunities for participation in CLR activities by tourists and local people?
- 6.2 Will it provide support for CLR providers?
- 6.3 Will it promote mixed-use development with good accessibility to local facilities and services (e.g. employment, education, health services, shopping, leisure, green spaces, culture etc), that reduce the need to travel?
- 6.4 Will it ensure that facilities and services are accessible to all communities?
- 6.5 Will it ensure suitable access for people with disabilities?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>The majority of the Borough's previously developed land is located within the urban areas such as Royal Tunbridge Wells and Southborough, which also have the greatest concentration of services and facilities (TWBC Accession Mapping (2007)) followed by the small rural towns of Paddock Wood, Cranbrook and Hawkhurst. New development in these areas would therefore help to ensure accessibility to services and facilities.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing social exclusion, improving health and wellbeing.</p>
Core Policy 2: Green Belt	-	✓	✓	<p>Maintaining the general extent of the Metropolitan Green Belt should secure access to open spaces in the Borough. However, in order to increase accessibility to open spaces within urban locations, the boundary could be revised in urban areas where access to open space is limited, thereby increasing access to recreation and leisure.</p> <p><b>Recommendations:</b> In urban areas where access to open spaces is limited, seek to revise the Green Belt boundary in order to improve informal recreational and leisure opportunities.  <b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanence  <b>Effects:</b> Cumulative effects for biodiversity, the countryside and health and wellbeing.</p>
Core Policy 3: Transport Infrastructure	-	✓✓	✓✓	<p>All aspects of this Policy will help to improve accessibility to services and facilities across the Borough.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Work with partners to help ensure public transport is affordable to all.</li> <li>• Reduce the need to travel through, for example, promoting mixed use development.</li> </ul> <p><b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing pollution and the need for travel.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 4: Environment	-	✓	✓✓	<p>Protecting and/or enhancing rural landscapes, landscape character, areas of biodiversity and the historic environment should secure access to open spaces and the historic built environment in the Borough for public enjoyment.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanence  <b>Effects:</b> Cumulative effects for biodiversity, the countryside and health and wellbeing.</p>
Core Policy 5: Sustainable Design	-	✓✓	✓✓	<p><b>This Policy will have benefits by improving the quality of design and ensuring the developments follow sustainability principles. In particular, the policy seeks to provide high quality design creating safe, accessible, legible and adaptable environments. Paragraph 5.125 of the justification text also states that ‘sustainable design should seek to ensure that developments are inclusive, accessible and adaptable in terms of their use by all people, now and in the future’.</b></p> <p>However, the policy no longer makes reference to the delivery of sustainable transport. This Policy requires more detailed policy and/or guidance in order to ensure successful implementation of this Policy.</p> <p><b>Recommendations:</b> More detailed policy and/or guidance is needed in order to ensure successful implementation of this Policy.  <b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving health and wellbeing.</p>
Core Policy 6: Housing Provision	-	✓	✓	<p>The Policy will direct the majority of new housing to urban areas followed by rural towns and villages (respectively) in the Borough. TWBC Accession Mapping (2007) shows the greatest concentration of services and facilities to be within the urban areas of Royal Tunbridge Wells and Southborough followed by the small rural towns of Paddock Wood, Cranbrook and Hawkhurst. New housing development concentrated in these areas would therefore help to ensure they have good accessibility.</p> <p><b>Recommendations:</b> Consideration needs to be given to the capacity of existing facilities to ensure all residents in the Borough (new and existing) can utilise available services and facilities.  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing social exclusion, improving health and wellbeing.</p>
Core Policy 7: Employment Provision	-	✓	✓✓	<p>This Policy will have benefits for improving accessibility to employment opportunities by increasing the quantity and quality of employment opportunities and safeguarding employment sites that are well located. This Policy will also safeguard Economic Development Areas in employment use across the Borough if they are well located to the main road or public transport network.</p>



**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<b>Recommendations:</b> None <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for reducing social exclusion, improving health and wellbeing, and stimulating and sustaining economic growth.
Core Policy 8: Retail and Leisure Provision	-	✓✓	✓✓	This Policy will have significant benefits by focussing new retail, leisure and other town centre uses within urban areas and rural towns. This Policy also resists the loss of community facilities and future out-of-town retailing. The accessibility of open spaces will also be maintained or improved as part of this Policy.  <b>Recommendations:</b> None <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for reducing social exclusion and improving health and wellbeing.

**General Comments/Recommendations**

None.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 7 - TO IMPROVE EFFICIENCY IN LAND USE THROUGH THE REUSE OF PREVIOUSLY DEVELOPED LAND AND EXISTING BUILDINGS, INCLUDING REUSE OF MATERIALS FROM BUILDINGS, AND ENCOURAGE URBAN RENAISSANCE

#### Sub-objectives

- 7.1 Will it ensure the provision of new development, including conversions on previously-developed land, as opposed to greenfield sites (in line with the sequential approach) and through conversion of existing buildings?
- 7.2 Will it encourage the reuse of materials in construction?
- 7.3 Will it require good design to create attractive, high quality environments where people will choose to live work and/or spend leisure time?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓✓	✓✓	<p>This Policy should have significant benefits by prioritising previously developed land or the conversion of existing buildings for all new development over greenfield sites.</p> <p><b>Recommendations:</b> None.  <b>Likelihood:</b> High.  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting biodiversity and the countryside.</p>
Core Policy 2: Green Belt	-	✓	✓	<p>Maintaining the general extent of the Green Belt will have benefits by ensuring development will take place on PDL through restricting the development of greenfield sites.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting the countryside and biodiversity.</p>
Core Policy 3: Transport Infrastructure	-	✓	✓	<p>This Policy will have benefits by improving existing rural lanes within the Borough – an efficient use of existing routes.</p> <p><b>Recommendations:</b> None.  <b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting biodiversity</p>
Core Policy 4: Environment	-	✓✓	✓✓	<p>This Policy will help to ensure reuse of PDL and will have benefits by protecting rural landscapes, existing landscape and biodiversity designations and the historic natural environment.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting biodiversity and the countryside.</p>
Core Policy 5: Sustainable Design	-		-	<p>This Policy requires sustainable design and construction in new developments. Improving efficiency in land use is addressed through Core Policy 1</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 6: Housing Provision	✓	✓	*	<p>This Policy should have significant benefits in the short to medium-term by prioritising previously developed land for housing development over greenfield sites. However, the results of the SHLAA show that in the long-term, the more limited availability of PDL at Cranbrook and Hawkhurst and very limited PDL availability at villages may result in the need to develop on greenfield sites.</p> <p><b>Recommendations: None.</b> <b>Likelihood: High.</b> <b>Scale: Local</b> <b>Permanence: Permanent</b> <b>Effects: Cumulative effects for protecting biodiversity and the countryside.</b></p>
Core Policy 7: Employment Provision	-	✓	✓✓	<p>This Policy will have benefits by increasing employment development within Royal Tunbridge Wells – a main urban area with the highest proportion of previously developed land available for development. This Policy will also have benefits through encouraging the re-use of surplus rural buildings for ED use.</p> <p><b>Recommendations: None</b> <b>Likelihood: High</b> <b>Scale: Local</b> <b>Permanence: Permanent</b> <b>Effects: Cumulative effects for protecting biodiversity, the countryside and improving accessibility.</b></p>
Core Policy 8: Retail and Leisure Provision	-	✓✓	✓✓	<p>This Policy seeks to focus new retail, leisure and other town centre uses within the main urban areas and rural towns of the Borough, and resists out-of-town retailing. This will have positive effects for reusing previously developed land.</p> <p><b>Recommendations: None</b> <b>Likelihood: High</b> <b>Scale: Local</b> <b>Permanence: Permanent</b> <b>Effects: Cumulative effects for protecting biodiversity, the countryside and improving accessibility.</b></p>

### General Comments/Recommendations

None.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 8 - TO REDUCE POLLUTION (TO LAND, AIR AND SOIL) AND MAINTAIN AND IMPROVE THE WATER QUALITY OF THE BOROUGH'S RIVERS, AND TO ACHIEVE SUSTAINABLE WATER RESOURCES MANAGEMENT

#### Sub-objectives

- 8.1 Will it promote more sustainable transport patterns in all areas, particularly those of low air quality (e.g. AQMAs)?
- 8.2 Will it try to ensure that national air quality strategy objectives are not breached?
- 8.3 Will it promote compliance with river ecology standards needed to meet the requirements of the EU Water Framework Directive?
- 8.4 Will it stabilise per capita consumption (PCC) of water at current levels?
- 8.5 Will it ensure water supply and demand are in balance to maintain security of supply, where appropriate by providing new water resource infrastructure?
- 8.6 Will it separate polluting development away from sensitive receptors?
- 8.7 Will development be designed so it is less likely to cause pollution?
- 8.8 Will it prevent inappropriate development in areas at risk of flooding?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>The majority of the Borough's previously developed land is located within the urban areas and rural towns of the Borough, which is in accordance with the Spatial Strategy and sequential approach for the location of housing development as stated within CP6 (Housing Provision). As a result, this Policy will have similar effects as for those identified for CP6.</p> <p><b>Recommendations:</b> See recommendations for CP6  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing, protecting biodiversity and the landscape and countryside.</p>
Core Policy 2: Green Belt	-	✓	✓	<p>Green areas contribute to carbon sequestration. Maintaining these areas will help to reduce carbon dioxide emissions.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing.</p>
Core Policy 3: Transport Infrastructure	-	✓✓	✓✓	<p>This Policy will have significant benefits for promoting sustainable transport patterns in all areas, thereby reducing the use of the private car which is the single main contributor to poor air quality in RTW and its surroundings. This Policy also has benefits through minimising further effects on the designated AQMA along the A26.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Consider actively promoting walking and cycling through campaigns, free cycle hire days etc as part of wider LDF documents</li> <li>• This Policy needs to be supported by further detailed policy (such as through the DC Policies DPD) and/or guidance, including the requirement for Transport Assessments and Green Travel Plans.</li> </ul>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing</p>
Core Policy 4: Environment	-	✓	✓	<p>Protection of the natural environment including areas of woodland will have benefits for air quality.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing, protecting biodiversity, the landscape and countryside.</p>
Core Policy 5: Sustainable Design	-	✓✓	✓✓	<p>This Policy will have significant benefits, including:</p> <ul style="list-style-type: none"> <li>• Helping to ensure national air quality objectives are not breached;</li> <li>• Promoting compliance with river ecology standards;</li> <li>• Stabilising per capita consumption of water;</li> <li>• Ensuring water supply and demand are in balance to maintain security of supply, where appropriate by providing new water resource infrastructure; and</li> <li>• Preventing inappropriate development in areas at risk of flooding.</li> </ul> <p>The Policy no longer makes reference to delivering sustainable transport (and thereby further reducing air quality) (note that this is covered under CP3).</p> <p><b>Recommendations:</b> More detailed policies and/or guidance is required in order to successfully implement this Policy. This could be in the form of a Sustainable Design and Construction Supplementary Planning Document.  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing, protecting biodiversity, the landscape and countryside.</p>
Core Policy 6: Housing Provision	-	✓	✓	<p>Focusing the majority of housing development at RTW and Southborough will help to reduce the need to travel by locating housing and other types of development around existing services and facilities in an area with good public transport provision. There are pockets of poor air quality including a designated Air Quality Management Area (AQMA) along the A26. This Policy therefore supports potential opportunities to achieve benefits through promoting sustainable transport to minimise effects on the AQMA. <i>(Note that the locational effects of new housing on issues such as flood risk has been addressed through the appraisal of the 'Place-Shaping Policies').</i></p> <p><b>Recommendations:</b></p> <p>Flood Risk Assessments (FRAs) should be prepared as part of planning applications for those developments that fall within the criteria stated within the TWBC SFRA (section 10.1.1). In addition, FRAs for developments in Paddock Wood, Five Oak Green and Cranbrook consider flooding from the sewer system and the consequences of a failure of the drainage system through blockage. FRAs for developments in Paddock Wood, Five Oak Green, Frittenden and Lamberhurst should also consider the risk of overland</p>

SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>flow to and from the development.  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing, protecting biodiversity and the landscape and countryside.</p>
Core Policy 7: Employment Provision	-	-	-	<p><b>Maintaining/increasing the amount of employment floor space specifically within Royal Tunbridge Wells will help to reduce the need to travel by locating employment uses around existing housing, services and facilities in an area with good public transport provision. There are pockets of poor air quality including a designated Air Quality Management Area (AQMA) along the A26. This therefore supports potential opportunities to achieve benefits through promoting sustainable transport to minimise effects on the AQMA.</b></p> <p>However, this Policy should ensure that the risk of fluvial and river flooding is reduced by ensuring employment land is located only in accordance with the findings of the TWBC Strategic Flood Risk Assessment (covered under CP5: Sustainable Design and Construction). This Policy encourages the intensification or redevelopment of existing employment sites at Paddock Wood. The TWBC SFRA identifies large areas to the north of Paddock Wood (north of the railway line) to be at risk from fluvial flooding, falling within Flood Zone 3b (a 'Functional Floodplain'). PPS25 states that development permitted within Flood Zone 3b includes 'water compatible' development and essential infrastructure only, however the latter would be subject to the 'Exception Test' as defined in PPS25. Therefore, in accordance with current SFRA mapping, buildings used for employment uses in this area would be deemed inappropriate. Further work is required to refine the extent and type of Flood Zones 3a/b within Paddock Wood, as new employment development would be deemed appropriate for Flood Zone 3a.</p> <p>Paddock Wood is situated on an aquifer vulnerable to contamination. Direct (e.g. into groundwater) and indirect (e.g. infiltration of discharges onto land) contamination sources will need to be appropriately mitigated.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Ensure employment-related development is located only in accordance with the findings of the SFRA (covered under CP5)</li> </ul> <p><b>Recommendations:</b> None.  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing and reducing social exclusion.</p>
Core Policy 8: Retail and Leisure Provision	-	✓	✓	<p>Similar effects to above given that the Policy will focus new retail, leisure and other town centre uses on the centres in the Borough, in accordance with the retail hierarchy (set out in the spatial strategy and in general accordance with the sequential approach of CP6).</p> <p><b>Recommendations:</b> As above.  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	

**Effects:** Cumulative effects for health and wellbeing, protecting biodiversity and the landscape and countryside.

**General Comments/Recommendations**

Sustainable Urban Drainage Systems (SUDS) will be of key importance for Borough in helping to reduce flood risk. See the appraisal of SA Objective 8 against the Place Shaping policies for site-specific recommendations regarding flood risk.

In order to avoid potential adverse effects on nearby European Sites (in particular Ashdown Forest), the Appropriate Assessment undertaken in 2009 by Scott Wilson recommends that TWBC should monitor progress of the ongoing assessment and recreational management studies being undertaken by Wealden District Council on the Ashdown Forest SAC/SPA and be prepared to participate in any collaborative cross authority management plan or associated scheme that may ultimately be developed from these studies. Any such measures would need to be applied by TWBC through incorporated into future DPDs or SPDs.

In addition, the Appropriate Assessment identifies that if the increase in population resulting from the delivery of 6,000 new homes within the District would reduce the ratio of accessible natural greenspace to population, then new areas of accessible greenspace would need to be identified and delivered at a minimum rate of 1ha/1000 new population (this being Natural England’s Accessible Natural Greenspace Standard).

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 9. TO ADDRESS THE CAUSES OF CLIMATE CHANGE THROUGH REDUCING EMISSIONS OF GREENHOUSE GASES

#### Sub-objectives

- 9.1 Will it require that development proposals are guided by ‘climate proofing’ principles (to allow an increase in use of renewable energies in the future)?
- 9.2 Will it reduce greenhouse gas emissions from domestic, commercial or industrial sources?
- 9.3 Will it prevent an increased risk of flooding?

For an appraisal of flood risk, please refer to the appraisal results for SA Objective 8.

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>The majority of the Borough’s previously developed land is located within the urban areas and rural towns of the Borough, which is in accordance with the Spatial Strategy and sequential approach for the location of housing development as stated within CP6 (Housing Provision). As a result, this Policy will have similar effects as for those identified for CP6 above.</p> <p><b>Recommendations:</b> See recommendations for CP6  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing, protecting biodiversity and the landscape and countryside.</p>
Core Policy 2: Green Belt	-	✓	✓	<p>Green areas contribute to carbon sequestration. Maintaining these areas will help to reduce carbon dioxide emissions.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for health and wellbeing.</p>
Core Policy 3: Transport Infrastructure	-	✓✓	✓✓	<p>This Policy will have significant benefits for reducing transport-related greenhouse gas emissions in the Borough. Whilst a park and ride network would not reduce the use of the private car, it will contribute to reducing congestion which is a major cause of greenhouse gas emissions.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>The Core Strategy’s Transport Policy should seek to reduce the need to travel in the first instance by, for example, promoting mixed-use development (covered by CP1).</li> <li>This Policy needs to be supported by further detailed policy (such as through the DC Policies DPD) and/or guidance, including the requirement for Transport Assessments and Green Travel Plans, the requirement for limited parking or car free developments, car club schemes and cycle hire.</li> </ul> <p><b>Likelihood:</b> High  <b>Scale:</b> Global  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for reducing pollution and improving accessibility.</p>
Core Policy 4: Environment	-	✓	✓	<p>Protection of the natural environment including areas of woodland will have benefits for reducing greenhouse gas emissions.</p>



**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Recommendations:</b> None</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Regional</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for health and wellbeing, protecting biodiversity, the landscape and countryside.</p>
Core Policy 5: Sustainable Design	-	✓✓	✓✓	<p>This Policy will have significant benefits by requiring sustainable design and construction principles to be incorporated within new developments to help mitigate against, and adapt to, the effects of climate change. Making efficient use of water resources, locating new development outside the Borough’s high flood risk zones and meeting carbon reduction targets would all help to reduce the effects of climate change. However, the Policy no longer makes reference to the delivery of sustainable transport (thereby reducing greenhouse gas emissions).</p> <p>In order to achieve successful implementation of this Policy, further detailed policies and/or guidance is required.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Further detailed policies and/or guidance is required. which include the setting of sustainable design and construction targets.</li> </ul> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Global</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for health and wellbeing and reducing pollution.</p>
Core Policy 6: Housing Provision	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Focusing the majority of housing development at the main urban areas of Royal Tunbridge Wells and Southborough in the first instance (in line with CP6’s Sequential Approach) would offer the greatest opportunity for the delivery of renewable technologies. However, the size and type of development as well as heritage, landscape and amenity constraints may restrict this potential. Directing the majority of development within the main urban areas should also help to reduce greenhouse gas emissions through a reduced need to travel by private vehicle.</p> <p>This Policy could do more to help address the causes of climate change by requiring new housing development to achieve high levels of sustainable design through the setting of a Code for Sustainable Homes target.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Financial contributions could be required where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy.</li> <li>• Require new housing development to achieve high levels of sustainable design through the setting of a Code for Sustainable Homes target.</li> </ul> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Global</p> <p><b>Permanence:</b> Permanence</p> <p><b>Effects:</b> Cumulative effects for the provision of decent sustainably constructed and affordable housing and reducing pollution.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 7: Employment Provision	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Focusing the majority of employment floor space at the main urban areas of Royal Tunbridge Wells would therefore offer the greatest opportunity for the delivery of renewable technologies. However, the size and type of development as well as heritage, landscape and amenity constraints may restrict this potential. Development at Royal Tunbridge Wells should also help to reduce greenhouse gas emissions through a reduced need to travel by private vehicle.</p> <p><b>Recommendations:</b> Financial contributions could be required where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy.  <b>Likelihood:</b> Medium  <b>Scale:</b> Global  <b>Permanence:</b> Permanence  <b>Effects:</b> Cumulative effects for the provision of decent sustainably constructed and affordable housing and reducing pollution.</p>
Core Policy 8: Retail and Leisure Provision	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Focusing the majority of retail, leisure and other town centre uses at the main urban areas of Royal Tunbridge Wells and Southborough in the first instance (in line with the retail hierarchy) would therefore offer the greatest opportunity for the delivery of renewable technologies. However, the size and type of development as well as heritage, landscape and amenity constraints may restrict this potential. Directing the majority of retail, development within the main urban areas should also help to reduce greenhouse gas emissions through a reduced need to travel by private vehicle.</p> <p><b>Recommendations:</b> Financial contributions could be required where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy.  <b>Likelihood:</b> Medium  <b>Scale:</b> Global  <b>Permanence:</b> Permanence  <b>Effects:</b> Cumulative effects for the provision of decent sustainably constructed and affordable housing and reducing pollution.</p>

**General Comments/Recommendations**

None.

# SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

## OBJECTIVE 10. TO CONSERVE AND ENHANCE THE BOROUGH’S BIODIVERSITY

### Sub-objectives

- 10.1 Will it protect, enhance and restore the Borough’s national and local designated sites?
- 10.2 Will it protect, enhance and restore the Local Biodiversity Action Plan’s priority habitats and species, and ensure the delivery of local biodiversity targets?
- 10.3 Will it encourage the development of new biodiversity assets and linkage to existing habitats within/alongside developments?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	?	?	?	<p>This Policy should have benefits by prioritising previously developed land or the conversion of existing buildings for all new development over greenfield sites. However, some areas of good urban ecology exist on previously developed land including a number of locally, regionally and nationally significant sites. The effect of increased development in these areas on biodiversity is therefore uncertain.</p> <p>In addition, the justification text to CP1 identifies that certain greenfield sites may need to be released after opportunities for development on PDL sites is exhausted, and that “<i>Greenfield sites will only be allocated where they are specifically required to meet an identified need for development; and where it is no longer necessary to retain them for their public or visual amenity value, or to retain the character of the surrounding area</i>” In order to protect the borough’s national and locally designed sites, CP1 should only release greenfield sites where they will not have a detrimental impact on the biodiversity of these areas.</p> <p><b>Recommendations:</b> Alter the justification text to ensure that greenfield sites will only be released where they would not have a detrimental impact on sites designated for biodiversity value</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Potentially national</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for protecting biodiversity and the countryside.</p>
Core Policy 2: Green Belt	✓	✓	x	<p><b>The approach within this policy is to maintain the general extent of the Green Belt, which should have benefits for conserving the Borough’s biodiversity in the short and medium-term.</b></p> <p><b>However, this Policy allows for sites within the Green Belt to be released around urban areas of RTW and Southborough (if this proves to be necessary to accord with the approved Spatial Strategy and if no other suitable non-Green Belt land is available to meet the need).</b></p> <p><b>Results of the SHLAA show that, in the long-term, the more limited availability of PDL at Cranbrook and Hawkhurst and very limited PDL availability at villages may result in the need to develop on greenfield sites, which in some locations would require revisions to inner Green Belt boundaries. This may result in some adverse effects in the long-term.</b></p> <p><b>Recommendations: None</b></p> <p><b>Likelihood: High</b></p> <p><b>Scale: Potentially national</b></p> <p><b>Permanence: Permanent</b></p> <p><b>Effects: Cumulative effects for protecting the countryside.</b></p>
Core Policy 3: Transport	-	-	-	<p>Improving existing rural lanes within the Borough should help to reduce the effects new transport infrastructure would have on biodiversity - particularly in rural areas.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Infrastructure				<p><b>Recommendations:</b> Ensure new transport infrastructure incorporates ecological enhancements and Sustainable Urban Drainage System (SUDS) technologies.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Potentially national</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for protecting the countryside.</p>
Core Policy 4: Environment	✓✓	✓✓	✓✓	<p>This Policy will have significant benefits by protecting rural landscapes, existing landscape and biodiversity designations and the historic natural environment. Minimising effects on biodiversity and enhancing it wherever possible will have significant benefits.</p> <p>This Policy will ensure the most sensitive and important habitats are given appropriate protection by applying a hierarchical approach to protecting and enhancing the network of nationally, regionally and locally designated sites and habitats.</p> <p>This Policy also supports Local Biodiversity Action Plan targets by identifying opportunities and locations for biodiversity enhancement through the creation and reinforcement of green corridors and by improving connectivity between habitats.</p> <p>Furthermore, the justification text to CP4 now states: <i>“The Council will seek to conserve biodiversity and, in particular, those identified in the BAPs, by adopting a robust policy of no net loss of important habitats or species, either directly or indirectly. It will also encourage proper ecological evaluation of development sites to ensure that development takes full account of biodiversity and will actively support the implementation of the BAPs. Where avoidance of loss is impossible, however, mitigation measures should be applied and, where mitigation cannot address the impacts, compensation will be required.”</i></p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>Given the high number of biodiversity constraints located within the Borough, more detailed guidance is required on how to design for biodiversity to support this Policy as part of the wider LDF (e.g. in the form of a Supplementary Planning Document).</li> </ul> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Potentially national</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for protecting the countryside.</p>
Core Policy 5: Sustainable Design	-	✓	✓	<p>This Policy will have some benefits for biodiversity by protecting the quality of water resources (thereby protecting aquatic environments) and improving air quality.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>More detailed policies and/or guidance (such as a Sustainable Design and Construction Supplementary Planning Document) is required to support this Policy.</li> </ul> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Potentially national</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for protecting the countryside and health and wellbeing.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 6: Housing Provision	?	?	*	<p>This Policy should have benefits by prioritising previously developed land for housing development over greenfield sites, which should help to conserve some of the Borough's existing biodiversity. Nonetheless, some areas of good urban ecology exist on previously developed land including a number of locally, regionally and nationally significant sites. The effect of increased development in these areas on biodiversity in the short to medium-term is therefore uncertain.</p> <p>In the long-term, results of the SHLAA show that the more limited availability of PDL at Cranbrook and Hawkhurst and very limited PDL availability at villages may result in the need to develop on greenfield sites, which may be located near the Borough's local, regional and nationally designated sites. Important designations in the Borough include International Sites of Special Scientific Interest (SSSI), Local Nature Reserves and Local Wildlife Sites.</p> <p><b>Recommendations:</b> See CP4 recommendations  <b>Likelihood:</b> High  <b>Scale:</b> Potentially national  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting the countryside.</p>
Core Policy 7: Employment Provision	?	?	?	<p>This Policy seeks to maintain/increase the amount of employment floor space across the Borough and specifically within Royal Tunbridge Wells. The magnitude of impact will therefore depend on location. Within Royal Tunbridge Wells, some areas of good urban ecology exist including locally, regionally and nationally significant sites.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Potentially national  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting the countryside.</p>
Core Policy 8: Retail and Leisure Provision	?	?	?	<p>This Policy seeks to focus new retail, leisure and other town centre uses within the main urban areas and rural towns of the Borough. As highlighted above, some areas of good urban ecology exist within urban areas and rural towns including a number of locally, regionally and nationally significant sites. The effect of increased development in these areas on biodiversity is therefore uncertain.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Potentially national  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting the countryside.</p>

### General Comments/Recommendations

The LDF should include standards that meet Natural England criteria for the provision of natural/semi natural sites for new developments:

- *Provision of at least 2ha of accessible natural green space per 1,000 population;*
- *No person should live more than 300m from their nearest area of natural green space; and*
- *There should be at least one accessible 20ha site within 2km from home*

Any alternative recreational space must be appropriate for the uses. The timing of the provision of such open spaces is also important with ideally provision made in advance of the relevant new developments being occupied.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 11. TO PROTECT, ENHANCE AND MAKE ACCESSIBLE FOR ENJOYMENT, THE BOROUGH’S COUNTRYSIDE AND HISTORIC ENVIRONMENT

#### Sub-objectives

- 11.1 Will it protect, enhance or restore the Borough's natural environmental assets and attractive countryside (e.g. the Green Belt, parks and green spaces, common land, woodland and forests, AONBs, geological assets, etc)
- 11.2 Will it protect, enhance or restore the Borough's cultural and heritage assets (e.g. SAMs, Listed Buildings, Historic Parks and Gardens, Conservation Areas etc)?
- 11.3 Will it promote the accessibility of the Borough's countryside and historic environment in sustainable and well-managed ways?
- 11.4 Will it significantly affect the quality of landscapes, in the Countryside or in more urban settings?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>This Policy will have benefits for protecting the countryside through prioritising the development of PDL land, which is largely located in urban centres.</p> <p><b>Recommendations:</b> AONB's to be afforded the highest level of protection.  <b>Likelihood:</b> High  <b>Scale:</b> Potentially national if AONBs are affected.  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
Core Policy 2: Green Belt	✓	✓	✗	<p>The Green Belt is in close proximity to urban areas, making Green Belt areas accessible given their location. Protecting the general extent of the Green Belt will therefore have benefits.</p> <p>However, this policy allows for sites within the Green Belt to be released around urban areas of RTW and Southborough (if this proves to be necessary to accord with the approved Spatial Strategy and if no other suitable non-Green Belt land is available to meet the need).</p> <p>Results of the SHLAA show that, in the long-term, the more limited availability of PDL at Cranbrook and Hawkhurst and very limited PDL availability at villages would result in the need to develop on greenfield sites, which in some locations would require revisions to inner Green Belt boundaries. This is likely to result in some adverse effects in the long-term.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Potentially national  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting biodiversity.</p>
Core Policy 3: Transport Infrastructure	-	✓	✓	<p>This Policy will have benefits through promoting accessibility and enjoyment of the Borough's countryside – in particular through facilitating increased use of the rural lanes network for cycling, walking and horse riding.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> Medium  <b>Scale:</b> Potentially national  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for biodiversity.</p>
Core Policy 4: Environment	✓✓	✓✓	✓✓	<p>This Policy will have significant benefits by protecting rural landscapes, existing landscape and biodiversity designations and the historic environment.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Recommendations:</b> None  <b>Likelihood:</b> To be informed by the results of the SHLAA.  <b>Scale:</b> Potentially national if AONBs are affected.  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting biodiversity.</p>
Core Policy 5: Sustainable Design	✓✓	✓✓	✓✓	<p>This Policy will have significant benefits by requiring developments to take appropriate account of their impact upon the character of distinctiveness of the local area. This Policy will also have benefits for protecting the historic built environment and countryside by improving air quality and seeking to avoid, reduce and manage present and future flood risk.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Potentially national  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for protecting biodiversity and health and wellbeing.</p>
Core Policy 6: Housing Provision	-	-	×	<p>The Strategic Housing Land Availability Assessment shows that, in the long-term, the limited availability of PDL in some areas of the Borough may result in the need to develop on greenfield sites, which may adversely impact the Borough’s countryside and historic environment.</p> <p>Notwithstanding this, the TWBC Landscape Character Assessment and Capacity Study identifies the potential for future expansion of some greenfield areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook without causing adverse effects for the Borough’s countryside or historic environment, provided that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p> <p><b>Recommendations:</b> Only permit new development in those areas capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.  <b>Likelihood:</b> High  <b>Scale:</b> Potentially national if AONBs are affected.  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
Core Policy 7: Employment Provision	-	-	-	<p>This Policy seeks to maintain/increase the amount of employment floor space across the Borough and specifically within Royal Tunbridge Wells. The TWBC Landscape Character Assessment and Capacity Study identifies that potential for future expansion of some areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook, on the proviso that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p> <p><b>Recommendations:</b> AONB’s to be afforded the highest level of protection. Only permit new development in those areas capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Likelihood: High</b>  <b>Scale: Potentially national if AONBs are affected.</b>  <b>Permanence: Permanent</b>  <b>Effects: Cumulative effects for conserving biodiversity and improving efficiency in land use.</b></p>
Core Policy 8: Provision for Retail and Leisure	-	-	-	<p>This Policy seeks to focus new retail, leisure and other town centre uses within the main urban areas and rural towns of the Borough. The main urban areas of Royal Tunbridge Wells and Southborough have a number of constraints in terms of Conservation Areas, Listed Buildings, Green Belt and AONB.</p> <p>Notwithstanding this, the TWBC Landscape Character Assessment and Capacity Study identifies that potential for future expansion of some areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook, on the proviso that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p> <p><b>Recommendations:</b> AONB's to be afforded the highest level of protection. Only permit new development in those areas identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.</p> <p><b>Likelihood:</b> High  <b>Scale:</b> Potentially national if AONBs are affected.  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>

**General Comments/Recommendations**

None.



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 12. TO IMPROVE TRAVEL CHOICE AND TO REDUCE THE NEED FOR TRAVEL, PARTICULARLY BY CAR/LORRY TO REDUCE ROAD CONGESTION

#### Sub-objectives

12.1 Will it promote more sustainable travel, particularly in areas with high congestion?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>This Policy will have benefits as previously development land is predominantly located within accessible areas (in terms of public transport accessibility and access to services and facilities).</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving accessibility, reducing poverty and social exclusion and greenhouse gas emissions, and improving health and wellbeing.</p>
Core Policy 2: Green Belt	-	-	-	<p>This Policy seeks to protect the Green Belt. Improving travel choice is covered under CP3.</p>
Core Policy 3: Transport	-	✓	✓	<p>This Policy will have benefits for promoting more sustainable travel across the Borough, and in particular in areas with high traffic congestion. This Policy will improve travel choice, although this Policy does not specifically mention bus facilities or limiting car parking provision.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Benefits could be maximised by seeking to reduce the need to travel in the first instance by encouraging mixed use development (covered under CP1) and other initiatives such as live/work units.</li> <li>• This Policy needs to be supported by further detailed policy (such as through the DC Policies DPD) and/or guidance, including the requirement for Transport Assessments and Green Travel Plans, the requirement for limited parking or car free developments, car club schemes and cycle hire, and promoting green energy cars if cars are required.</li> </ul> <p><b>Likelihood:</b> High  <b>Scale:</b> Regional  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for improving accessibility, reducing poverty and social exclusion and greenhouse gas emissions, and improving health and wellbeing.</p>
Core Policy 4: Environment	-	-	-	<p>This Policy seeks to protect the historic and natural environment. Improving travel choice is covered under CP3.</p>
Core Policy 5: Sustainable Design	-	✓✓	✓✓	<p>This Policy will have benefits for improving public realm, accessibility and legibility. Paragraph 5.123 of the justification text also states that 'sustainable design should seek to ensure that developments are inclusive, accessible and adaptable in terms of their use by all people, now and in the future'.</p> <p><b>Recommendations:</b> None.</p> <p><b>Likelihood:</b> High  <b>Scale:</b> Regional</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving accessibility, reducing poverty and social exclusion and greenhouse gas emissions, and improving health and wellbeing.</p>
Core Policy 6: Housing Provision	-	✓✓	✓✓	<p>The TWBC 2007 Accession Mapping Study identifies the main urban areas of RTW and Southborough as being the most accessible (in terms of both public transport and access to services and facilities) in the Borough. Accessibility modelling also identifies the small rural towns to have good access to key services and facilities. Therefore focusing the majority of housing development at these areas would have benefits for reducing the need to travel.</p> <p><b>Recommendations:</b> None (covered by Core Policy 3)</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Regional</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving accessibility to services and facilities, reducing poverty and social exclusion and greenhouse gas emissions, and improving health and wellbeing.</p>
Core Policy 7: Employment Provision	-	✓	✓✓	<p>New employment development at Royal Tunbridge Wells would have benefits given the good existing public transport accessibility. Safeguarding Economic Development Areas that are well located to the main road and public transport network for employment use would secure benefits for this objective.</p> <p><b>Recommendations:</b> None.</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Regional</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving accessibility, reducing poverty and social exclusion and greenhouse gas emissions, and improving health and wellbeing.</p>
Core Policy 8: Retail and Leisure Provision	-	✓	✓	<p>This Policy will have benefits by locating retail and leisure development in accessible locations, and resisting out-of-town retailing that would increase the need to travel. Resisting the loss of community facilities would also have benefits by securing a reduced need to travel.</p> <p><b>Recommendations:</b> None (covered by Core Policy 10)</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Regional</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for improving accessibility to services and facilities, reducing poverty and social exclusion and greenhouse gas emissions, and improving health and wellbeing.</p>

### General Comments/Recommendations

None.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 13. TO REDUCE THE IMPACT OF RESOURCE CONSUMPTION BY USING SUSTAINABLY PRODUCED AND LOCAL PRODUCTS AND REDUCING WASTE GENERATION AND DISPOSAL

#### Sub-objectives

- 13.1 Will it promote the use of sustainably-sourced, and recycled, materials in construction and renovation?
- 13.2 Will it increase efficiency in water (e.g. water meters), energy and raw materials use?
- 13.3 Will it increase prevention, reuse, recovery and recycling of waste?
- 13.4 Will it promote sustainable waste management practices through the provision of a range of appropriate waste management facilities?
- 13.5 Will it reduce use of non-renewable resources?
- 13.6 Will it increase use of renewable energies?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>The reuse of buildings will have benefits for increasing efficiency in raw materials use and the prevention of waste associated with demolition.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for increasing energy efficiency</p>
Core Policy 2: Green Belt	-	-	-	Reducing the impact of resource consumption is covered by Core Policy 5: Sustainable Design and Construction.
Core Policy 3: Transport	-	-	-	Reducing the impact of resource consumption is covered by Core Policy 5: Sustainable Design and Construction.
Core Policy 4: Environment	-	-	-	Reducing the impact of resource consumption is covered by Core Policy 5: Sustainable Design and Construction.
<b>Core Policy 5: Sustainable Design</b>	-	✓✓	✓✓	<p><b>This Policy will have benefits for increasing efficiency in water, energy and raw materials use, reducing the use of non-renewable resources and increase the use of renewable energies. The Policy will also maximise the potential for waste reduction and recycling.</b></p> <p>The justification text of CP5 also states that ‘the Council will apply the most up-to-date regional and national targets as a minimum (footnote) for example, the Code for Sustainable Homes and BREEAM’. This will ensure new developments will help in meeting carbon reduction targets set by the South East Plan.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>In addition to waste reduction and recycling (point 5), add concepts of the reuse and recovery of waste, in line with the waste hierarchy.</li> </ul> <p><b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for increasing energy efficiency and addressing the causes of climate change.</p>
Core Policy 6: Housing Provision	-	-	-	Reducing the impact of resource consumption is covered by Core Policy 5: Sustainable Design and Construction.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

---

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 7: Employment Provision	-	-	-	Reducing the impact of resource consumption is covered by Core Policy 5: Sustainable Design and Construction.
Core Policy 8: Provision for Retail and Leisure	-	-	-	Reducing the impact of resource consumption is covered by Core Policy 5: Sustainable Design and Construction.

---

### General Comments/Recommendations

The Core Strategy must encourage new developments to follow the waste hierarchy– increasing prevention, reuse, recovery and recycling of waste during design, demolition and/or construction and operation phases –and, where appropriate, include a range of appropriate waste management facilities such as public recycling collection points.

The Core Strategy should also make reference to the Waste Development Framework Joint Development Plan Document being produced by Kent County Council, which will be of relevance to the Borough of Tunbridge Wells.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 14. TO INCREASE ENERGY EFFICIENCY, AND THE PROPORTION OF ENERGY GENERATED FROM RENEWABLE SOURCES IN THE BOROUGH

#### Sub-objectives

14.1 Will it increase efficiency in energy use?

14.2 Will it provide for the establishment of renewable energy developments?

14.3 Will it promote the incorporation of small-scale renewables (e.g. photovoltaic cells and Combined Heat and Power Plants) in developments?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	✓	✓	<p>Similar to appraisal results for CP6.</p> <p><b>Recommendations:</b> See CP5 recommendations  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for addressing the causes of climate change and reducing poverty and social exclusion.</p>
Core Policy 2: Green Belt	-	-	-	Not applicable to this Policy.
Core Policy 3: Transport Infrastructure	-	✓✓	✓✓	<p>This Policy will have significant benefits for increasing energy efficiency in the Borough through encouraging sustainable modes of travel.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for addressing the causes of climate change and reducing poverty and social exclusion.</p>
Core Policy 4: Environment	-	-	-	Not applicable to this Policy.
<b>Core Policy 5: Sustainable Design</b>	-	✓✓	✓✓	<p><b>This Policy will encourage best practice in sustainable construction and all developments will be expected to have regard to, and contribute towards, South East Plan renewable energy and energy efficiency targets, to meet carbon reduction targets.</b></p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• <b>Consideration requiring contributions towards the provision of offsite renewables or community heating schemes from developments unable to deliver onsite renewable due to morphological or landscape/heritage constraints.</b></li> </ul> <p><b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for addressing the causes of climate change.</p>
Core Policy 6: Housing Provision	-	✓	✓	<p>On-site renewable are more likely to be delivered on larger sites. Focusing the majority of housing development at the main urban areas of Royal Tunbridge Wells and Southborough in the first instance therefore offers good opportunities for the delivery of renewable technologies.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>Some renewable options may be restricted by heritage and local amenity constraints within the Borough. Some smaller scale sites may also limit the potential to trigger the threshold for the inclusion of renewable facilities.</p> <p>Morphological constraints may also restrict some development options within urban sites, which may limit the ability to maximise natural heat and light gained through orientation.</p> <p><b>Recommendations:</b> See CP5 recommendations  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for addressing the causes of climate change, reducing poverty and social exclusion and ensuring everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>
Core Policy 7: Employment Provision	-	✓	✓	<p>Similar to above.</p> <p><b>Recommendations:</b> See CP5 recommendations  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for addressing the causes of climate change and reducing poverty and social exclusion.</p>
Core Policy 8: Retail and Leisure Provision	-	✓	✓	<p>Similar to above.</p> <p><b>Recommendations:</b> See CP5 recommendations  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for addressing the causes of climate change and reducing poverty and social exclusion.</p>

**General Comments/Recommendations**

None.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 15. TO ENSURE HIGH AND STABLE LEVELS OF EMPLOYMENT SO EVERYONE CAN BENEFIT FROM THE ECONOMIC GROWTH OF THE BOROUGH

#### Sub-objectives

15.1 Will it provide employment opportunities that match the skills of the local workforce?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	-	-	Ensuring high and stable levels of employment is covered under Core Policy 7: Employment Provision.
Core Policy 2: Green Belt	-	-	-	Ensuring high and stable levels of employment is covered under Core Policy 7: Employment Provision.
Core Policy 3: Transport Infrastructure	-	✓	✓	This Policy would help ensure the accessibility of employment uses  <b>Recommendations:</b> None <b>Likelihood:</b> High <b>Scale:</b> Local/regional <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for stimulating and sustaining economic growth and reducing poverty and social exclusion.
Core Policy 4: Environment	-	-	-	Ensuring high and stable levels of employment is covered under Core Policy 7: Employment Provision.
Core Policy 5: Sustainable Design	-	-	-	Ensuring high and stable levels of employment is covered under Core Policy 7: Employment Provision.
Core Policy 6: Housing Provision	-	-	-	Ensuring high and stable levels of employment is covered under Core Policy 7: Employment Provision.
Core Policy 7: Employment Provision	✓	✓✓	✓✓	This Policy will have significant benefits for creating new employment opportunities in the Borough. However, it is uncertain if these employment opportunities will match the skills of the local workforce.  <b>Recommendations:</b> Where feasible, local labour agreements could be considered for major developments to, where necessary, enable local people to access jobs, apprenticeships or jobs placements in the construction and and/or end use phases of developments in order to meet the wider needs of the community. <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for stimulating and sustaining economic growth and reducing poverty and social exclusion.
Core Policy 8: Retail and Leisure Provision	✓	✓	✓	New retail and leisure development will provide new employment opportunities.  <b>Recommendations:</b> None <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for stimulating and sustaining economic growth and reducing poverty and social exclusion.

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

---

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	

---

**General Comments/Recommendations**

---

None.



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 16. TO STIMULATE AND SUSTAIN ECONOMIC GROWTH AND COMPETITIVENESS ACROSS THE BOROUGH

#### Sub-objectives

16.1 Will it maintain/increase the opportunities for local employment across the Borough?

16.2 Will it sustain the vitality and viability of the village?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
Core Policy 1: Delivery of Development	-	-	-	Stimulating and sustaining economic growth and competitiveness across the Borough is covered under Core Policies 7 and 8.
Core Policy 2: Green Belt	-	-	-	Stimulating and sustaining economic growth and competitiveness across the Borough is covered under Core Policies 7 and 8.
Core Policy 3: Transport Infrastructure	-	✓	✓	Improving accessibility (particularly to public transport) across the Borough would help to facilitate and sustain growth in the local economy <b>Recommendations:</b> None. <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion
Core Policy 4: Environment	-	-	-	Stimulating and sustaining economic growth and competitiveness across the Borough is covered under Core Policies 7 and 8.
Core Policy 5: Sustainable Design	-	-	-	Stimulating and sustaining economic growth and competitiveness across the Borough is covered under Core Policies 7 and 8.
Core Policy 6: Housing Provision	-	✓	✓	The provision of new housing development would have medium to long-term benefits for stimulating and sustaining the local economy through increased spending by new residents. <b>Recommendations:</b> None. <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion
Core Policy 7: Employment Provision	✓	✓✓	✓✓	This Policy will have significant benefits by maintaining and increasing employment opportunities across the Borough. <b>Recommendations:</b> <ul style="list-style-type: none"> <li>Where feasible, Local Business Agreements could be considered for major developments to provide local businesses with opportunities to compete for contracts by highlighting the procurement opportunities for the Borough's small businesses and building the capacity of small businesses to compete for contracts.</li> <li>Subject to affordability/viability constraints, in areas with good existing public transport provision such as Royal Tunbridge Wells and Paddock Wood, the Council could also require developers to contribute smaller affordable work spaces (or offsite contributions) for employment uses (since small start-up enterprises are likely to be more reliant on public transport).</li> </ul>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.
Core Policy 8: Provision for Retail and Leisure	✓	✓✓	✓✓	This Policy will have significant benefits by ensuring the long-term vitality and viability of centres within the Borough.  <b>Recommendations:</b> A nighttime economy including venues such as restaurants and theatres are supported in the Sustainable Communities Plan and this needs to be reflected within this Policy. <b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.

**General Comments/Recommendations**

None.

Appendix E TESTING THE PLACE-SHAPING POLICIES AGAINST THE SA FRAMEWORK

Key to Impact Appraisal

Magnitude

- ✓✓ Option has a major positive impact on the SA Objective
- ✓ Option has a minor positive impact on the SA Objective
- Option has a neutral impact on the SA Objective
- × Option has a minor negative impact on the SA Objective
- ×× Option has a major negative impact on the SA Objective
- ? Impact is uncertain

Timing

- ST – Short-term (during the construction of new residential development)
- MT – Medium-term (5 to 10 years post completion of new residential development)
- LT – Long-term (Over 10 years post completion of new residential development)

- Likelihood – High, Medium or Low
- Scale – Local, regional, national or global
- Permanence – Temporary or permanent
- Effect – Secondary, cumulative or synergistic effects

Methodology:

The 'Place-Shaping' Policies appraisal has only considered those sustainability issues of spatial significance for defined areas within the Borough. General sustainability issues applicable on a borough-wide scale, such as the need for sustainable design and construction, have been considered as part of the appraisal of 'General' Policies.

**Note:** Grey shading within the appraisal tables indicates where the appraisal has been reconsidered. Bold text identifies where the appraisal has changed since Sustainability Appraisal of the Preferred Options stage.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### SA OBJECTIVE 1: TO ENSURE THAT EVERYONE HAS THE OPPORTUNITY TO LIVE IN A DECENT, SUSTAINABLY CONSTRUCTED AND AFFORDABLE HOME

#### Sub-objectives

- 1.1 Would it increase the amount of housing across the Borough to meet local needs?
- 1.2 Would it increase the supply of affordable housing both in numbers and as a proportion of total housing stock?
- 1.3 Would it reduce the percentage of unfit/non-decent homes in the Borough?
- 1.4 Would it ensure the provision of housing to serve the needs of rural areas?
- 1.5 Would it promote the adoption of sustainable design and construction practices in housing (e.g. energy/ water/ land/ materials efficiency, incorporation of biodiversity/natural assets etc)?
- 1.6 Would it promote the development of mixed communities through a range of housing sizes, types, tenures and levels of affordability to reflect changes in population?

Core Policies	ST	MT	LT	Explanation and Comments
<b>9. Development in Royal Tunbridge Wells</b>	-	✓✓	✓✓	<b>The majority of affordable housing need and unfit homes are located within Royal Tunbridge Wells (RTW), which includes the most deprived areas of the Borough and also provides the main focus for jobs for key workers. Providing 70% of the total Borough's housing requirement within RTW including sufficient affordable housing to meet both unmet and future needs therefore offers good opportunity to address the local housing needs of RTW.</b>
<b>10. Development in Southborough</b>	-	✓	✓	<b>Directing 5% of new residential units to Southborough will help to ensure the local housing needs of Southborough are met.</b>
11. Development in Paddock Wood	-	✓	✓	The 2005 Housing Needs Survey identified Paddock Wood as requiring a significant amount of affordable housing, second only to RTW. This policy will therefore help to address existing local affordability issues. Providing a greater choice of housing types would address local housing needs in Paddock Wood.  Given the more limited availability of brownfield land, this is not likely to have a significant long-term increase in the provision of housing. However, significant benefits are expected in the medium-term through the refurbishment and development of existing housing stock.
12. Development in Cranbrook	-	✓	✓	This Policy will help to ensure the local needs of Cranbrook are met. Small scale residential development will help to meet the needs of both market and affordable housing.
13. Development in Hawkhurst	-	✓	✓	This Policy will help to ensure the local needs of Hawkhurst are met. Small scale residential development will help to meet the needs of both market and affordable housing.
14. Development in the Villages	-	✓	✓	Providing affordable housing on rural exception sites will ensure that the local housing needs of villages are met.
15. Development in the Rural Areas	-	✓	✓	This Policy will help to ensure the local needs (including affordable housing needs) of rural areas are met.

#### General Comments/Recommendations

None.

**Likelihood:** High

**Scale:** Local

**Permanence:** Permanent

**Effects:** Providing new affordable housing has the potential to improve the health and wellbeing of some Borough residents and reduce poverty and social exclusion.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### SA OBJECTIVE 2: TO IMPROVE THE HEALTH AND WELLBEING OF THE POPULATION AND REDUCE INEQUALITIES IN HEALTH

#### Sub-objectives

- 2.1 Would it promote healthy, active lifestyles through the protection and provision of facilities and locations of sporting/recreational activities (e.g. playing fields, sports facilities, cycleways, footpaths etc)?
- 2.2 Would it promote informal recreation through access to the countryside?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	✓	✓✓	<p>The Index of Multiple Deprivation (IMD) 2004 identifies the highest levels of health deprivation and disability in some wards within RTW, therefore focusing development here will contribute to reducing inequalities. Strengthening the role of neighbourhood centres in providing local services to residents and a focus for community interaction within RTW will have a positive effect for improving overall health and wellbeing. The provision of a range of new uses such as residential, commercial, economic and cultural will have positive effects through the provision of new affordable homes, the creation of new job opportunities and the provision of new community and cultural facilities. Focusing development in the main urban areas will also provide benefits through easy convenient access to existing sports, leisure and recreation facilities.</p> <p>Particular encouragement is also given to health sector business. Preserving the relationship between landscape and townscape will help to promote healthy lifestyles for those living in central town areas by maintaining access to recreational areas.</p> <p><b>Recommendations:</b> Prioritise the provision of different community and cultural uses according to local need (current and future).</p>
10. Development in Southborough	-	✓	✓✓	<p>The Index of Multiple Deprivation (IMD) 2004 identifies the highest levels of health deprivation and disability in some wards within Southborough, therefore focusing development here will contribute to reducing inequalities. The provision of a range of new uses such as residential, commercial, economic and cultural will have positive effects through the provision of new affordable homes, the creation of new job opportunities and the provision of new community and cultural facilities. Enhancing links to RTW will also encourage the uptake of sustainable transport modes such as walking, cycling and the use of public transport.</p> <p><b>Recommendations:</b> Prioritise the provision of different community and cultural uses according to local need (current and future).</p>
11. Development in Paddock Wood	-	✓	✓	<p>In comparison to the rest of the Borough, the IMD (2004) identifies higher levels of health deprivation and disability in some wards within and surrounding Paddock Wood. Providing residential development to enhance the provision of infrastructure and community facilities (such as recreation and health facilities) serving the town will have positive health benefits for both existing and future residents. The provision of activities to strengthen the social economy of the town will also have health and wellbeing benefits. This Policy also aims to strengthen the social economy of the town by providing restaurants and meeting places offering opportunities for informal recreation.</p> <p><b>Recommendations:</b> Targeted improvements to key service infrastructure and community facilities should be based on existing and predicted local need.</p>
12. Development in Cranbrook	-	✓	✓	<p>This Policy would ensure that Cranbrook secures a long-term function of providing services and community facilities to residents locally and within the wider rural area.</p> <p><b>Recommendations:</b> None.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
13. Development in Hawkhurst	-	✓	✓	<p>This Policy would ensure that Hawkhurst secures a long-term function of providing services and community facilities to residents locally and within the wider rural area.</p> <p><b>Recommendations:</b> None.</p>
14. Development in the Villages	-	✓	✓✓	<p><b>Protecting and enhancing village centres to provide easily accessible facilities and local services should help ensure positive health and wellbeing effects for rural residents within the Borough.</b></p> <p>Seeking improvements to alternative modes of transport networks, including walking, cycling and the use of public transport, should also secure significant long-term health and wellbeing benefits.</p> <p><b>Recommendations:</b> None.</p>
15. Development in the Rural Areas	-	✓	✓✓	<p><b>Maximising the benefits of the countryside and promoting long-term sustainability within rural areas should help ensure positive health and wellbeing benefits for rural residents and workers in the long-term.</b></p> <p>This Policy would also help promote informal recreation activities to the countryside through protecting and enhancing the character of the landscape and operating a policy of restraint on general development.</p> <p>Encouraging non-vehicular modes of transport between rural settlements and within rural areas by ensuring the existing network of public footpaths and bridleways are protected, maintained and improved will also secure significant long-term health and wellbeing benefits through encouraging a more active lifestyle.</p> <p><b>Recommendations:</b> None.</p>

### General Comments/Recommendations

The provision of different types of community facilities and infrastructure across the Borough should be prioritised according to existing and predicted local needs. Care should be taken so that additional residential development does not result in the capacities of existing health care and recreation/leisure facilities being exceeded

**Likelihood:** High

**Scale:** Local

**Permanence:** Permanent

**Effects:** Cumulative effects for reducing poverty and social exclusion.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 3: TO REDUCE POVERTY AND SOCIAL EXCLUSION

#### Sub-objectives

3.1 Would it promote or support employment opportunities across the Borough for the most deprived wards?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	✓	✓✓	✓✓	<p>The sensitive regeneration of RTW including the development of new commercial, economic and retail uses should result in a significant number of new job opportunities in the most deprived areas of the Borough. Development in this location would also provide new jobs/services within areas accessible by walking, cycling or public transport. However, care should be taken regarding the location of new affordable housing in order to create mixed and balanced sustainable communities.</p> <p>In the short-term, new development would support new employment opportunities during the demolition and/or construction phases of development.</p> <p><b>Recommendations:</b> Adopt a ‘pepper-pot’ approach to the provision of affordable housing in order to help create mixed and balanced communities and avoid creating pockets of social exclusion.</p>
10. Development in Southborough	✓	✓✓	✓✓	<p><b>The development of new commercial, economic and retail uses should result in a significant number of new job opportunities in the most deprived areas Southborough. Development in this location would also provide new jobs/services within areas accessible by walking, cycling or public transport. However, care should be taken regarding the location of new affordable housing in order to create mixed and balanced sustainable communities.</b></p> <p>In the short-term, new development would support new employment opportunities during the demolition and/or construction phases of development.</p> <p><b>Recommendations: Adopt a ‘pepper-pot’ approach to the provision of affordable housing in order to help create mixed and balanced communities and avoid creating pockets of social exclusion.</b></p>
11. Development in Paddock Wood	✓	✓✓	✓✓	<p>The IMD (2004) shows greater multiple deprivation within urban areas and towns in the Borough. Significant economic development in Paddock Wood would support employment opportunities and help to reduce social deprivation and exclusion. However new jobs should be prioritised for residents of Paddock Wood where possible in order to reduce the effects of the existing ‘commuter culture’ for the town due to the train connections to Tonbridge and beyond. Encouraging the provision of smaller, more flexible commercial and industrial spaces will also have benefits by creating diversity of employment.</p> <p>In the short-term, new development would support new employment opportunities during the demolition and/or construction phases of development.</p> <p><b>Recommendations:</b> Prioritise new jobs for local residents where possible.</p>
12. Development in Cranbrook	-	-	✓	<p>The IMD (2004) shows greater multiple deprivation in urban areas and towns within the Borough. Maintaining and securing the long-term function of Cranbrook as a provider of employment opportunities, services and community facilities to local residents and a wider rural hinterland should support local and rural employment opportunities in the long-term, thereby helping to reduce and/or prevent deprivation.</p> <p><b>Recommendations:</b> None.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
13. Development in Hawkhurst	-	-	✓	The IMD (2004) shows greater multiple deprivation in urban areas and towns within the Borough. Maintaining and securing the long-term function of Hawkhurst as a provider of employment opportunities, services and community facilities to local residents and a wider rural hinterland should support local and rural employment opportunities in the long-term, thereby helping to reduce and/or prevent deprivation.
14. Development in the Villages	-	-	✓✓	<b>Residents of villages experience deprivation in terms of barriers to housing and services. Retaining existing employment sites and ensuring villages provide accessible facilities and local services that meet day-to-day needs of local people should therefore help to reduce and/or prevent deprivation. Seeking improvements to existing walking, cycling and public transport routes should also help to break down barriers to residents of visitors accessing services elsewhere in the Borough.</b>  <b>Recommendations: None.</b>
15. Development in the Rural Areas	-	-	✓✓	<b>Wards within rural areas experience deprivation in terms of barriers to housing and services. Strengthening the rural economy and safeguarding its long-term sustainability by providing opportunities for commercial activity should support rural employment opportunities in the long-term, thereby helping to reduce and/or prevent deprivation.</b>  <b>In addition, identifying opportunities and planning for new green routeways within and between settlements to encourage non-vehicle modes of public transport should also help to break down barriers to residents of rural areas accessing key services.</b>  <b>Recommendations: None.</b>

### General Comments/Recommendations

None.

**Likelihood:** High

**Scale:** Local

**Permanence:** Permanent

**Effects:** Reducing poverty and social exclusion has cumulative effects for health and wellbeing.



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

**OBJECTIVE 4: TO RAISE EDUCATIONAL ACHIEVEMENT ACROSS THE BOROUGH AND DEVELOP THE OPPORTUNITIES FOR EVERYONE TO ACQUIRE THE LIFETIME SKILLS NEEDED TO FIND AND REMAIN IN WORK AND SUPPORT THE LONG-TERM COMPETITIVENESS OF THE BOROUGH**

### Sub-objectives

- 4.1 Would it increase opportunities for education/ training for everyone?  
 4.2 Would it increase opportunities to improve the level of basic skills and/ or information/ communication technology?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	?	?	<p>The IMD (2004) identifies RTW and Southborough as areas with poorer levels of educational achievement (in comparison to the rest of the Borough). Effects are uncertain as it is unclear whether new educational and training facilities will be provided in order to support new residential development in the area.</p> <p><b>Recommendations:</b> New education and training facilities must be provided in accordance with current and predicted local needs.</p>
10. Development in Southborough	-	?	?	<p>The IMD (2004) identifies RTW and Southborough as areas with poorer levels of educational achievement (in comparison to the rest of the Borough). Effects are uncertain as it is unclear whether new educational and training facilities will be provided in order to support new residential development in the area.</p> <p><b>Recommendations:</b> New education and training facilities must be provided in accordance with current and predicted local needs.</p>
11. Development in Paddock Wood	-	?	?	<p>The IMD (2004) identifies the rural town of Paddock Wood as an area with poorer levels of educational achievement (in comparison to the rest of the Borough). Effects are uncertain as it is unclear whether new educational and training facilities will be provided as part of community facilities in order to support new residential development in the area.</p> <p><b>Recommendations:</b> New education and training facilities must be provided in accordance with current and predicted local needs.</p>
12. Development in Cranbrook	-	?	?	<p>The IMD (2004) identifies the rural towns of Cranbrook and Hawkhurst as areas with poorer levels of educational achievement (in comparison to the rest of the Borough). Effects are uncertain as it is unclear whether new educational and training facilities will be provided in order to support new residential development in Cranbrook.</p> <p>This is particularly important given the role of Cranbrook as a service provider to rural areas.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>New education and training facilities must be provided in accordance with current and predicted local needs.</li> </ul>
13. Development in Hawkhurst	-	?	?	<p>The IMD (2004) identifies the rural towns of Cranbrook and Hawkhurst as areas with poorer levels of educational achievement (in comparison to the rest of the Borough). Effects are uncertain as it is unclear whether new educational and training facilities will be provided in order to support new residential development in Hawkhurst.</p> <p>This is particularly important given the role of Hawkhurst as a service provider to rural areas.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>New education and training facilities must be provided in accordance with current and predicted local needs.</li> </ul>
14. Development in the Villages	-	✓	✓	<p>Resisting the loss of essential services and facilities should secure access to local education/training infrastructure.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>In addition, promoting alternative modes of transport and infrastructure improvements, and seeking improvements to these networks, should help to improve public transport accessibility between villages, rural towns and urban areas. This will help ensure residents in villages have adequate access to education and training opportunities.</p> <p><b>Recommendations:</b> Consideration needs to be given to the capacity of existing educational/training facilities</p>
15. Development in the Rural Areas	-	✓	✓	<p>Maintaining a hierarchy of settlements (consisting of small rural towns, villages and settlements) in the countryside and improving access between them should help to improve accessibility to existing educational/training facilities in rural areas. In addition, encouraging non-vehicular modes of transport between rural settlements and within rural areas by ensuring that the existing network of public footpaths and bridleways are protected and maintained and planning for new green routeways within and between settlements should ensure residents in rural areas have adequate access to education and training opportunities.</p> <p>Maximising these opportunities within countryside areas will also have positive effects.</p> <p><b>Recommendations:</b> Consideration needs to be given to the capacity of existing educational/training facilities</p>

### General Comments/Recommendations

Core Policy 15: Development in the Rural Areas should ensure that residents in rural areas, including villages and rural towns, have access to non-vehicular modes of transport to access education and training opportunities, which may be offered elsewhere within the Borough, such as Royal Tunbridge Wells. However, consideration needs to be given to the capacity of existing educational/training facilities in the Borough in order to ensure that there is sufficient capacity to cater for the increase in residential development across the Borough (in the order of 6,000 new homes).

The Core Strategy should take account of likely changes to education provision by, for example, having regard to Education Strategic Plans produced by Kent County Council (KCC), such as the Strategic Plan for the Provision of Secondary School Places 2007-2017.

**Likelihood:** High

**Scale:** local

**Permanence:** Permanent

**Effects:** Positive knock on effects for health and wellbeing and reducing poverty and social exclusion.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 5: TO REDUCE CRIME AND THE FEAR OF CRIME

#### Sub-objectives

5.1 Would it reduce crime or fear of crime through good urban design measures?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	✓	✓✓	<p>Whilst the strategic location of development will not have an effect on the levels of crime, locating new development within the existing neighbourhood of Royal Tunbridge Wells would have benefits, including opportunities for:</p> <ul style="list-style-type: none"> <li>• Natural surveillance;</li> <li>• Regenerating the most deprived areas;</li> <li>• Local improvements to help crime and the fear of crime.</li> </ul>
10. Development in Southborough	-	✓	✓✓	<p>Whilst the strategic location of development will not have an effect on the levels of crime, locating new development within the existing neighbourhood of Southborough would have benefits, including opportunities for:</p> <ul style="list-style-type: none"> <li>• Natural surveillance;</li> <li>• Regenerating the most deprived areas;</li> <li>• Local improvements to help crime and the fear of crime.</li> </ul>
11. Development in Paddock Wood	-	✓	✓	<p>Locating new development within the existing neighbourhood of Paddock Wood would have benefits, including opportunities for:</p> <ul style="list-style-type: none"> <li>• Natural surveillance;</li> <li>• Regenerating the most deprived areas;</li> <li>• Local improvements to help crime and the fear of crime.</li> </ul>
12. Development in Cranbrook	-	✓	✓	<p>Locating new development within the existing neighbourhood of Cranbrook would have benefits, including opportunities for:</p> <ul style="list-style-type: none"> <li>• Natural surveillance;</li> <li>• Regenerating the most deprived areas;</li> <li>• Local improvements to help crime and the fear of crime.</li> </ul>
13. Development in Hawkhurst	-	✓	✓	<p>Locating new development within the existing neighbourhood of Hawkhurst would have benefits, including opportunities for:</p> <ul style="list-style-type: none"> <li>• Natural surveillance;</li> <li>• Regenerating the most deprived areas;</li> <li>• Local improvements to help crime and the fear of crime.</li> </ul>
14. Development in the Villages	-	✓	✓	<p>Locating new development within existing villages would have benefits, including opportunities for:</p> <ul style="list-style-type: none"> <li>• Natural surveillance;</li> <li>• Regenerating the most deprived areas;</li> <li>• Local improvements to help crime and the fear of crime.</li> </ul>
15. Development in the Rural Areas	-	-	-	<p>Development in rural areas would not have benefits typically associated with new development in existing settlements. Good urban design measures would therefore be important to limit opportunities for crime and the fear of crime.</p>

#### General Comments/Recommendations

Consider specifying a requirement for mixed-use development, which would facilitate natural surveillance.

**Scale:** Local

**Permanence:** Permanent

**Effects:** Cumulative effects for reducing social exclusion and improving health and wellbeing.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 6: TO IMPROVE ACCESSIBILITY TO ALL SERVICES AND FACILITIES, INCLUDING EMPLOYMENT, EDUCATION, HEALTH SERVICES, SHOPPING, GREEN SPACE, CULTURE, LEISURE, RECREATION (CLR) FACILITIES AND A SUSTAINABLE TOURISM SECTOR

#### Sub-objectives

- 6.1 Would it offer opportunities for participation in CLR activities by tourists and local people?
- 6.2 Would it provide support for CLR providers?
- 6.3 Would it promote mixed-use development with good accessibility to local facilities and services (e.g. employment, education, health services, shopping, leisure, green spaces, culture etc), that reduce the need to travel?
- 6.4 Would it ensure that facilities and services are accessible to all communities?
- 6.5 Would it ensure suitable access for people with disabilities?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	✓✓	✓✓	<p>The greatest concentration of services and facilities is in Royal Tunbridge Wells and therefore providing new development here such as residential development will ensure good accessibility to these services. The comprehensive redevelopment of the town centre for a range of uses will support the role of Royal Tunbridge Wells (with Tonbridge) as a regional 'hub'.</p> <p>The Policy will have benefits through promoting the development of leisure and cultural facilities and seeks to improve transport and movement. Concentrating new cultural and tourism development within these areas would be of benefit to improving tourism in the area – the spa town of Royal Tunbridge Wells is a popular tourist destination.</p> <p><b>Recommendations: None.</b></p>
10. Development in Southborough	-	✓✓	✓✓	<p><b>Reinforcing the function of Southborough as a town centre through the provision a new mixed-use development to provide retail, commercial and community facilities will improve accessibility of existing and new residents of Southborough to all services and facilities.</b></p> <p><b>Improving links to RTW (specifically through sustainable transport modes) will also improve accessibility to RTW's CLR facilities and promote a sustainable tourism sector.</b></p> <p><b>Recommendations: None.</b></p>
11. Development in Paddock Wood	-	✓	✓	<p>This Policy will encourage and facilitate the provision of additional comparison floor space to increase the vitality and viability of the Paddock Wood town centre, and encourage the provision of activities to strengthen the social economy of the town such as community uses, restaurants and meeting places. This will have benefits for improving the accessibility of existing and future residents to services and facilities.</p> <p><b>Recommendations:</b> Ensure that workers have the opportunity to access sustainable modes of travel, particularly between residential and employment uses within Paddock Wood. This, combined with the provision of new employment space, may help to reduce the level of out-commuting by the resident workforce.</p>
12. Development in Cranbrook	-	✓	✓	<p><b>Maintaining and securing Cranbrook as a provider of employment opportunities, services and community facilities to local residents and residents of other rural settlements should secure rural accessibility to services and facilities.</b></p> <p><b>This Policy also considers the capacity of existing community services and facilities and the needs of the occupiers of new housing by allocating sites for community facilities to meet local community requirements.</b></p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
<b>Recommendations: None.</b>				
13. Development in Hawhurst	-	✓	✓	<p><b>Maintaining and securing Hawhurst as a provider of employment opportunities, services and community facilities to local residents and residents of other rural settlements should secure rural accessibility to services and facilities.</b></p> <p><b>Recommendations: The LDF should allocate sites for community facilities to meet local community requirements. This will ensure that the capacity of existing community services and facilities and the needs of the occupiers of new housing, including those provided on rural exception sites, are considered.</b></p>
14. Development in the Villages	-	✓	✓	<p>Resisting the loss of essential services and facilities and retaining existing employment sites should secure access to essential services and facilities to meet local needs. Promoting alternative modes of transport and infrastructure improvements will also improve accessibility to services and facilities and strengthen the interrelationship of rural settlements in the Borough.</p> <p>However, consideration should be given to the capacity of existing village services and facilities and the needs of the occupiers of new housing, including those provided on rural exception sites.</p> <p><b>Recommendations:</b> Ensure that new essential services and facilities are provided (where required) to meet the local needs of the occupiers of new housing development.</p>
15. Development in the Rural Areas	-	✓	✓	<p><b>Maintaining a hierarchy of settlements within rural areas in the Borough should ensure small rural towns continue to provide essential services and facilities to the rural community.</b></p> <p><b>By working to improve access between rural towns, villages and settlements, the opportunities for participation in CLR activities by local people and tourists will improve. In particular, identifying opportunities and planning for new green routeways within and between settlements and encouraging non-vehicular modes of transport will have significant benefits for maximising accessibility in the rural area.</b></p> <p><b>Recommendations: Consideration should be given to the capacity of existing rural services and facilities and the needs of the occupiers of new housing, including those provided on rural exception sites.</b></p>

**General Comments/Recommendations**

Enhancing public transport accessibility (see CP14, CP15) will also be of benefit for creating a sustainable tourism sector; particularly to famous tourist attractions in the Borough including Scotney Castle and Sissinghurst Castle Gardens.

**Likelihood:** High

**Scale:** Regional

**Permanence:** Permanent

**Effects:** Positive cumulative effects for reducing poverty and social exclusion, improving health and wellbeing, stimulating and sustaining economic growth and competitiveness and reducing the need to travel.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

**OBJECTIVE 7: TO IMPROVE EFFICIENCY IN LAND USE THROUGH THE REUSE OF PREVIOUSLY DEVELOPED LAND AND EXISTING BUILDINGS, INCLUDING REUSE OF MATERIALS FROM BUILDINGS, AND ENCOURAGE URBAN RENAISSANCE**

### Sub-objectives

- 7.1 Would it ensure the provision of new development, including conversions on previously-developed land, as opposed to greenfield sites (in line with the sequential approach) and through conversion of existing buildings?
- 7.2 Would it encourage the reuse of materials in construction?
- 7.3 Would it require good design to create attractive, high quality environments where people would choose to live work and/or spend leisure time?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	✓	✓	✗	<p>Royal Tunbridge Wells together with Southborough has the greatest opportunity for the reuse of PDL. Meeting the vast majority of the Borough's needs for residential, retail, commercial, social and cultural development in RTW would therefore improve efficiency in land use.</p> <p>However, in the long-term, results of the SHLAA show that 31% of new housing identified for RTW and Southborough combined (approximately 75% of the Borough's total housing requirement) may need to be delivered on greenfield sites. This may have adverse effects in the long-term for this objective.</p> <p>Recommendations: None. The Core Strategy will prioritise the provision of development on PDL and through the conversion of existing buildings, with the development of greenfield sites as a last resort.</p>
10. Development in Southborough	✓	✓	✗	<p>Southborough presents the second greatest opportunity for the reuse of PDL. Meeting the vast majority of the Borough's needs for residential, retail, commercial, social and cultural development in Southborough would therefore improve efficiency in land use.</p> <p>However, in the long-term, results of the SHLAA show that 31% of new housing identified for RTW and Southborough combined (approximately 75% of the Borough's total housing requirement) may need to be delivered on greenfield sites. This may have adverse effects in the long-term for this objective.</p> <p>Recommendations: None. The Core Strategy will prioritise the provision of development on previously developed land and through the conversion of existing buildings, with the development of greenfield sites as a last resort.</p>
11. Development in Paddock Wood	✓	✗	✗	<p>This Policy will prioritise the development of PDL through maintaining the general extent and detailed inner boundaries of the Green Belt around Paddock Wood.</p> <p>However, results of the SHLAA show that approximately 90% of new housing identified for Paddock Wood (approximately 10% of the Borough's total housing requirement) may need to be delivered on greenfield sites. This may have some adverse effects for this objective in the medium to long-term.</p> <p>Recommendations: None. The Core Strategy will prioritise the provision of development on previously developed land and through the conversion of existing buildings, with the development of greenfield sites as a last resort.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
12. Development in Cranbrook	✓	✓	x	<p>Results of the SHLAA show that approximately 24% of new housing identified for Cranbrook (approximately 5% of the Borough's total housing requirement) may need to be delivered on greenfield sites. This may have some adverse effects in the long-term.</p> <p>Recommendations: None. The Core Strategy will prioritise the provision of development on previously developed land and through the conversion of existing buildings, with the development of greenfield sites as a last resort.</p>
13. Development in Hawkhurst	✓	✓	x	<p>Results of the SHLAA show that approximately 63% of new housing identified for Hawkhurst (approximately 4% of the Borough's total housing requirement) may need to be delivered on greenfield sites. This may have some adverse effects in the long-term.</p> <p>Recommendations: None. The Core Strategy will prioritise the provision of development on previously developed land and through the conversion of existing buildings, with the development of greenfield sites as a last resort.</p>
14. Development in the Villages	✓	✓	x	<p>Results of the SHLAA show that between 0 to 62% of new housing identified for the Villages (approximately 3% of the Borough's total housing requirement) may need to be delivered on greenfield sites. This may have some adverse effects in the long-term.</p> <p>Recommendations: None. The Core Strategy will prioritise the provision of development on previously developed land and through the conversion of existing buildings, with the development of greenfield sites as a last resort.</p>
15. Development in the Rural Areas	✓	✓	x	<p>Results of the SHLAA show that approximately 52% of new housing identified for the rural area (approximately 3% of the Borough's total housing requirement) may need to be delivered on greenfield sites. This may have some adverse effects in the long term.</p> <p>Recommendations: None. The Core Strategy will prioritise the provision of development on previously developed land and through the conversion of existing buildings, with the development of greenfield sites as a last resort.</p> <p><i>Note: The 'rural area' refers to the areas outside the rural towns and villages. The specific effects of new development at rural towns Paddock Wood, Cranbrook and Hawkhurst and at villages have been appraised as part of Core Policies 11, 12, 13 and 14 above.</i></p>

### General Comments/Recommendations

The land release strategy identified in Core Policy 1 prioritises the development of PDL over the development of greenfield sites. It prioritises the release of development on PDL within the existing defined Limits to Built Development (LBD) of the Borough's settlements, both to facilitate access to services while minimising the need to travel and to protect valuable features of the countryside and open space. In furthering these objectives, however, the results of the SHLAA have shown that certain greenfield sites within the LBD may be released after PDL sites. These will only be released where it is no longer necessary to protect them for either their public or visual amenity function and their development would not have a detrimental impact on the character of the area. This is consistent with the aims of SA Objective 7.

It should be noted that the SHLAA will be reviewed in 2015, at which point more PDL sites may become available for reuse.

**Likelihood:** High

**Scale:** Local

**Permanence:** Permanent

**Effects:** Cumulative effects for conserving and enhancing the Borough’s biodiversity and protecting the Borough’s countryside including Metropolitan Green Belt.



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 8: TO REDUCE POLLUTION (TO LAND, AIR AND SOIL) AND MAINTAIN AND IMPROVE THE WATER QUALITY OF THE BOROUGH’S RIVERS, AND TO ACHIEVE SUSTAINABLE WATER RESOURCES MANAGEMENT

#### Sub-objectives

- 8.1 Would it promote more sustainable transport patterns in all areas, particularly those of low air quality (e.g. AQMAs)?
- 8.2 Would it try to ensure that national air quality strategy objectives are not breached?
- 8.3 Would it promote compliance with river ecology standards needed to meet the requirements of the EU Water Framework Directive?
- 8.4 Would it stabilise per capita consumption (PCC) of water at current levels?
- 8.5 Would it ensure water supply and demand are in balance to maintain security of supply, where appropriate by providing new water resource infrastructure?
- 8.6 Would it separate polluting development away from sensitive receptors?
- 8.7 Would development be designed so it is less likely to cause pollution?
- 8.8 Would it prevent inappropriate development in areas at risk of flooding?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	✓	✓	<p>This Policy will reduce the need to travel by focusing housing development around existing services and facilities including good public transport infrastructure. Pockets of poor air quality, including a designated Air Quality Management Area (AQMA), exist along the A26. Development in these areas needs to be appropriately designed. This Policy will support opportunities to achieve benefits through promoting sustainable transport to minimise effects on the AQMA.</p> <p>The TWBC Strategic Flood Risk Assessment (SFRA) identifies small tracts of land within RTW (surrounding the tributaries of the River Medway and River Teise) to fall within Flood Zone 3b (a 'Functional Floodplain'). Development on or near these areas needs to be appropriate as determined by Sequential Testing – e.g. water compatible, no residential development in areas of risk (covered under Core Policy 5).</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Only water compatible uses or essential infrastructure as listed in PPS25 (Development and Flood Risk) should be permitted within Flood Zone 3b.</li> <li>• RTW is in proximity to an aquifer vulnerable to contamination. Direct (e.g. into groundwater) and indirect (e.g. infiltration of discharges onto land) contamination sources will need to be appropriately mitigated.</li> <li>• Sustainable design, construction and operation needs to be adhered to in order to avoid potential contamination of the tributaries of the River Medway and River Teise.</li> </ul>
10. Development in Southborough	-	✓	✓	<p>This Policy will reduce the need to travel by focusing housing development around existing services and facilities including good public transport infrastructure. Pockets of poor air quality, including a designated Air Quality Management Area (AQMA), exist along the A26. Development in these areas needs to be appropriately designed. This Policy will support opportunities to achieve benefits through promoting sustainable transport to minimise effects on the AQMA.</p> <p>The TWBC Strategic Flood Risk Assessment (SFRA) identifies small tracts of land within Southborough (surrounding the tributaries of the River Medway and River Teise) to fall within Flood Zone 3b (a 'Functional Floodplain'). Development on or near these areas needs to be appropriate as determined by Sequential Testing – e.g. water compatible, no residential development in areas of risk.</p>

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Only water compatible uses or essential infrastructure as listed in PPS25 (Development and Flood Risk) should be permitted within Flood Zone 3b.</li> <li>• Sustainable design, construction and operation needs to be adhered to in order to avoid potential contamination of the tributaries of the River Medway and River Teise.</li> </ul>
11. Development in Paddock Wood	-	-	-	<p><b>Paddock Wood has good links to Tonbridge (outside the Borough) but limited public transport links to RTW and Southborough. Provided occupants/residents of new development access Tonbridge rather than RTW for jobs, services and facilities not provided within the town, this Policy should not increase the need to travel by car.</b></p> <p><b>This Policy will also help to reduce the risk of fluvial and river flooding by ensuring residential development is located only in accordance with the findings of the TWBC Strategic Flood Risk Assessment (SFRA).</b></p> <p><b>However, this should be extended to encompass all types of development - the TWBC SFRA identifies large areas to the north of Paddock Wood (north of the railway line) to be at risk from fluvial flooding, falling within Flood Zone 3b (a 'Functional Floodplain'). PPS25 states that development permitted within Flood Zone 3b includes 'water compatible' development and essential infrastructure only, however the latter would be subject to the 'Exception Test' as defined in PPS25. Therefore, in accordance with current SFRA mapping, buildings used for employment uses in this area would be deemed inappropriate. Further work is required to refine the extent and type of Flood Zones 3a/b within Paddock Wood, as new employment development would be deemed appropriate for Flood Zone 3a.</b></p> <p><b>Paddock Wood is situated on an aquifer vulnerable to contamination. Direct (e.g. into groundwater) and indirect (e.g. infiltration of discharges onto land) contamination sources will need to be appropriately mitigated.</b></p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• <b>Improve public transport links between Paddock Wood and RTW and Southborough.</b></li> <li>• <b>Ensure all types of development are located only in accordance with the findings of the SFRA.</b></li> </ul>
12. Development in Cranbrook	-	-	-	<p><b>Cranbrook has experienced flooding in the past as a result of overloading of the sewer system and/or inadequate capacity of a culvert either through overloading and/or blockage.</b></p> <p><b>Public transport improvements are required within rural areas to encourage more sustainable modes of travel between rural towns and villages in order to avoid adverse air quality effects (covered under Core Policy 15).</b></p> <p><b>Recommendations:</b></p> <p><b>As identified in the TWBC SFRA, planning applications for development in Cranbrook should submit a FRA that considers flooding from the sewer system and the consequences of a failure of the drainage system through blockage.</b></p>

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
13. Development in Hawkhurst	-	-	-	<p>Public transport improvements are required within rural areas to encourage more sustainable modes of travel between rural towns and villages in order to avoid adverse air quality effects (covered under Core Policy 5).</p> <p>Hawkhurst is situated on an aquifer vulnerable to contamination.</p> <p><b>Recommendations:</b></p> <p>Ensure direct and indirect aquifer contamination sources are appropriately mitigated.</p>
14. Development in the Villages	-	-	-	<p><b>This Policy will seek improvements to walking cycling and public transport networks in and between villages. This will encourage more sustainable modes of travel between villages and subsequently help to reduce the reliance on the private vehicle and avoid adverse air quality effects.</b></p> <p>The TWBC SFRA identifies parts of the villages of Five Oak Green and Lamberhurst at risk of fluvial flooding (Flood Zone 3b – Functional Floodplain). In line with Sequential Testing, new housing development must be avoided within these areas. Five Oak Green has also experienced flooding as a result of overland flooding of the sewer system and/or inadequate capacity of a culvert either through overloading and/or blockage. Areas around Five Oak Green, Frittenden and Lamberhurst have also experienced flooding as a result of overland flow.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Ensure residential development is located only in accordance with the findings of the TWBC Strategic Flood Risk Assessment (SFRA) and PPS25.</li> <li>• Only water compatible uses or essential infrastructure as listed in PPS25 should be permitted within Flood Zone 3b.</li> <li>• As identified in the TWBC SFRA, planning applications for development in Five Oak Green, Frittenden and Lamberhurst should submit a FRA that considers the risk of overland flow to and from the development and SuDS that may be used to mitigate this risk. FRAs should also consider building layouts so as not to exacerbate risk of flooding from overland flow. FRAs for development in Five Oak Green should also consider flooding from the sewer system and the consequences of a failure of the drainage system through blockage.</li> </ul>
15. Development in the Rural Areas	-	-	-	<p>Policy CP15 seeks to encourage non-vehicular modes of transport between the rural settlements and within rural areas by: ensuring that the existing network of public footpaths and bridleways are protected, maintained and improved; and planning for new green route ways within and between settlements. This will encourage more sustainable modes of travel between rural towns and villages and subsequently avoid adverse air quality effects.</p> <p>The TWBC SFRA identifies some rural areas within the Borough to fall within Flood Zone 3b (Functional Floodplain). Development on or near these areas needs to be appropriate as determined by Sequential Testing – e.g. water compatible, no residential development in areas of risk.</p>

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>Surface water features are more likely to be in their natural form in rural areas. Development in rural areas should seek to protect natural river systems and surface water features.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>• Only water compatible uses or essential infrastructure as listed in PPS25 should be permitted within Flood Zone 3b.</li> <li>• Some rural settlements are located in proximity to aquifers vulnerable to contamination. Direct (e.g. into groundwater) and indirect (e.g. infiltration of discharges onto land) contamination sources will need to be appropriately mitigated.</li> <li>• This Policy should seek to protect natural river systems and surface water features.</li> </ul>

**General Comments/Recommendations**

**Flood Risk**

In accordance with paragraph 3.17 of the PPS25 Practice Guide, all areas within Flood Zone 3 (as identified in the TWBC SFRA) should be considered as Flood Zone 3b unless, or until, appropriate assessment shows to the satisfaction of the Environment Agency that the area falls within Flood Zone 3a. Therefore, in all areas where the functional floodplain has not been defined and no suitable surrogate data is available, the functional floodplain (Flood Zone 3b) has been defined as the extent of Flood Zone 3a within the TWBC SFRA. This has significant consequences given ‘less vulnerable’ uses including employment uses are considered suitable within Flood Zone 3a and inappropriate for Flood Zone 3b. *Further assessment of areas falling within Flood Zone 3 is therefore required to refine the extent and type of Flood Zones 3a/b.*

*Flood Risk Assessments (FRAs) should also be required by the TWBC LDF as part of planning applications for those developments which fall within the criteria stated within the TWBC SFRA (section 10.1.1).*

**Groundwater Resources**

Groundwater resources are vulnerable to contamination from direct sources (e.g. into groundwater) or indirect sources (e.g. infiltration of discharges onto land). The TWBC SFRA identifies groundwater vulnerability within the Borough based on an Environment Agency review of aquifer characteristics, local geology and the leaching of potential soils. *In order to minimise contamination, the Local Development Framework (LDF) should require appropriate Sustainable Urban Drainage Systems (SuDS) based on groundwater availability.*

In addition to groundwater vulnerability, the Environment Agency defines groundwater Source Protection Zones (SPZs) to protect areas of groundwater that are used for potable supply, or for the use in the production of commercial food and drinks. The TWBC SFRA identifies locations within the Borough which fall within SPZs (section 9.6.2), including SPZs in proximity to the settlements of Pembury, Matfield and Goudhurst. *In order to minimise contamination, the LDF should also consider restrictions on the types of SuDS appropriate to certain areas, depending on the nature of the proposed development and the location of the development site with regards to SPZs. The allocation of new industrial sites (and other potential polluters) should also be situated away from these areas.*

**Water Supply and Demand**

Careful consideration should be made to ensuring additional development will not result in future water demand exceeding supply. *If required, land should be safeguarded for the provision of new water resource infrastructure to support additional development planned for the Borough.*

*Code for Sustainable Homes and BREEAM design targets would ensure a high standard of water efficiency within new developments in order to help reduce water demand (in line with Core Policy 5).*

**Siting of Development**

*The LDF must ensure that polluting development is kept away from sensitive receptors, such as existing residential areas.*

**Likelihood:** High

**Scale:** Regional

**Permanence:** Permanent

**Effects:** Cumulative effects for improving travel choice and reducing the need for travel, and improving health and wellbeing.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 9: TO ADDRESS THE CAUSES OF CLIMATE CHANGE THROUGH REDUCING EMISSIONS OF GREENHOUSE GASES

#### Sub-objectives

- 9.1 Would it require that development proposals are guided by 'climate proofing' principles (to allow an increase in use of renewable energies in the future)?
- 9.2 Would it reduce greenhouse gas emissions from domestic, commercial or industrial sources?
- 9.3 Would it prevent an increased risk of flooding?

Note: For an appraisal regarding flood risk, please refer to the appraisal results for SA Objective 8.

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Development at the main urban area of RTW offers the greatest opportunity for the delivery of renewable energy technologies, although some renewable options may be restricted by heritage and amenity constraints. Morphological constraints may also restrict some development options within urban sites, which may limit the ability to maximise natural heat and light gained through orientation.</p> <p>The TWBC 2007 Accession Mapping Study identifies RTW together with Southborough as being the most accessible (in terms of both public transport and access to services and facilities) in the Borough. This Policy will therefore also help to reduce greenhouse gas emissions through a reduced need to travel, in particular by car.</p> <p><b>Recommendations:</b> Energy efficient design could be enforced through the requirement of BREEAM and Code for Sustainable Homes standards. Subject to affordability constraints, consider contributions towards the provision of offsite renewable or community heating schemes from developments unable to deliver onsite renewables due to morphological or heritage/amenity constraints.</p>
10. Development in Southborough	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Development at the main urban area of Southborough offers good opportunity for the delivery of renewable energy technologies, although some renewable options may be restricted by heritage and amenity constraints. Morphological constraints may also restrict some development options within urban sites, which may limit the ability to maximise natural heat and light gained through orientation.</p> <p>The TWBC 2007 Accession Mapping Study identifies RTW together with Southborough as being the most accessible (in terms of both public transport and access to services and facilities) in the Borough. This Policy will therefore also help to reduce greenhouse gas emissions through a reduced need to travel, in particular by car.</p> <p><b>Recommendations:</b> Energy efficient design could be enforced through the requirement of BREEAM and Code for Sustainable Homes standards. Consider contributions towards the provision of offsite renewable or community heating schemes from developments unable to deliver onsite renewables due to morphological or heritage/amenity constraints.</p>
11. Development in Paddock Wood	-	✓	✓	<p>Paddock Wood is less restricted (in comparison to other Borough settlements) in terms of heritage constraints and therefore presents a good opportunity to deliver on-site renewables. However, morphological constraints may restrict some development options within Paddock Wood, which may limit the ability to maximise natural heat and light gained through orientation. In addition, in comparison to development at RTW and Southborough, smaller development would be less likely to meet the thresholds for on-site renewable energy provision, and heritage, landscape and amenity constraints may further restrict opportunities.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>The TWBC 2007 Accession Mapping Study identifies Paddock Wood as being very accessible, particularly through public transport links to Tonbridge and beyond. This Policy will therefore also help to reduce greenhouse gas emissions through a reduced need to travel, in particular by car.</p> <p><b>Recommendations:</b> Energy efficient design could be enforced through the requirement of BREEAM and Code for Sustainable Homes standards. Subject to affordability considerations, financial contributions could be required for smaller-scale development or other cases where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>
12. Development in Cranbrook	-	-	-	<p>Smaller development would be less likely to meet the thresholds for on-site renewable energy provision, and heritage, landscape and amenity constraints may further restrict opportunities.</p> <p><b>Recommendations:</b> Energy efficient design could be enforced through the requirement of BREEAM and Code for Sustainable Homes standards. Subject to affordability considerations, financial contributions could be required for smaller-scale development or other cases where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy. Public transport improvements (including improvements to cycle and walkways) are needed for rural areas to avoid an increase in private vehicle use which would result in an increase in greenhouse gas emissions.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>
13. Development in Hawkhurst	-	-	-	<p>Smaller development would be less likely to meet the thresholds for on-site renewable energy provision, and heritage, landscape and amenity constraints may further restrict opportunities.</p> <p><b>Recommendations:</b> Energy efficient design could be enforced through the requirement of BREEAM and Code for Sustainable Homes standards. Subject to affordability considerations, financial contributions could be required for smaller-scale development or other cases where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy. Public transport improvements (including improvements to cycle and walkways) are needed for rural areas to avoid an increase in private vehicle use which would result in an increase in greenhouse gas emissions.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>
14. Development	-	-	-	<p>The development of smaller sites would be less likely to trigger the requirement for renewables.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
in the Villages				<p>However, this policy seeks to reduce transport-related greenhouse gases through promoting alternative modes of transport and infrastructure improvements – in particular walking, cycling and the use of public transport.</p> <p><b>Recommendations:</b> Subject to affordability considerations, contributions could be required for smaller-scale development or other cases where on-site provision is not feasible. Public transport improvements (including improvements to cycle and walkways) are needed for rural areas to avoid an increase in private vehicle use which would result in an increase in greenhouse gas emissions.</p> <p><b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes, reducing pollution and reducing the need to travel.</p>
15. Development in the Rural Areas	-	-	-	<p>The development of smaller sites would be less likely to trigger the requirement for renewables.</p> <p>However, this policy seeks to reduce greenhouse gas emissions by encouraging non-vehicular modes of transport between rural settlements and within rural areas.</p> <p><b>Recommendations:</b> Subject to affordability considerations, contributions could be required for smaller-scale development or other cases where on-site provision is not feasible. Public transport improvements (including improvements to cycle and walkways) are needed for rural areas to avoid an increase in private vehicle use which would result in an increase in greenhouse gas emissions.</p> <p><b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>

**General Comments/Recommendations**

The development of greenfield sites may increase the risk of flooding due to a reduction in surface area for infiltration. Sustainable Urban Drainage Systems will help to mitigate this effect (covered under Core Policy 5).

**Likelihood:** Medium  
**Scale:** Local  
**Permanence:** Permanent

**Effects:** Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 10: TO CONSERVE AND ENHANCE THE BOROUGH’S BIODIVERSITY

#### Sub-objectives

- 10.1 Would it protect, enhance and restore the Borough’s national and local designated sites?
- 10.2 Would it protect, enhance and restore the Local Biodiversity Action Plan’s priority habitats and species, and ensure the delivery of local biodiversity targets?
- 10.3 Would it encourage the development of new biodiversity assets and linkage to existing habitats within/alongside developments?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	?	?	x	<p>Some areas of good urban ecology exist in RTW, including a number of regional and locally significant sites such as Sites of Local Conservation Value (SLNCV), Local Nature Reserves (LNR) as well as urban Biodiversity Action Plan (BAP) priority habitats. In the short to medium-term, effects resulting from the development on PDL sites within RTW is therefore uncertain.</p> <p>Results of the SHLAA show that approximately 69% of new housing identified for RTW and Southborough combined (refer to the Spatial Strategy) will be able to be delivered on PDL sites. As such, this Policy may involve some greenfield land take and/or fringe development in the long-term which may have the potential to adversely affect these areas. Appropriate mitigation measures and opportunities for enhancement should be considered.</p> <p>Recommendations: See recommendations identified as part of the appraisal for CP5: Sustainable Design and Construction and CP4: Environment.</p>
10. Development in Southborough	?	?	x	<p>Some areas of good urban ecology exist in Southborough, including a number of regional and locally significant sites such as Sites of Local Conservation Value (SLNCV), Local Nature Reserves (LNR) as well as urban Biodiversity Action Plan (BAP) priority habitats. In the short to medium-term, effects resulting from the development on PDL sites within Southborough is therefore uncertain.</p> <p>Results of the SHLAA show that approximately 69% of new housing identified for RTW and Southborough combined (refer to the Spatial Strategy) will be able to be delivered on PDL sites. As such, this Policy may involve some greenfield land take and/or fringe development in the long-term which may have the potential to adversely affect these areas. Appropriate mitigation measures and opportunities for enhancement should be considered.</p> <p>Recommendations: See recommendations identified as part of the appraisal for CP5: Sustainable Design and Construction and CP4: Environment.</p>
11. Development in Paddock Wood	?	?	x	<p>Some good areas of urban ecology can exist on PDL sites. In the short to medium-term, effects resulting from the development on PDL sites within Paddock Wood is therefore uncertain.</p>



SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>A large tract of Metropolitan Green Belt (MGB) extends up to, and abuts, the western boundary of Paddock Wood, with some small LNR's to the south. Whilst MGB is not a biodiversity designation, it still supports habitats and species. Results of the SHLAA show that approximately 10% of new housing identified for Paddock Wood (refer to the Spatial Strategy) will be able to be delivered on PDL sites. As such, this Policy may involve some greenfield land take and/or fringe development, which may have the potential to adversely affect these areas. Appropriate mitigation measures and opportunities for enhancement should be considered.</p> <p>Recommendations: See recommendations identified as part of the appraisal for CP5: Sustainable Design and Construction and CP4: Environment.</p>
12. Development in Cranbrook	?	?	x	<p>Some good areas of urban ecology can exist on PDL sites. In the short to medium-term, effects resulting from the development of PDL sites within Cranbrook is therefore uncertain.</p> <p>LNR sites are situated in proximity to the rural town of Cranbrook. Results of the SHLAA show that approximately 76% of new housing identified for Cranbrook (refer to the Spatial Strategy) will be able to be delivered on PDL sites. As such, this Policy may involve some greenfield land take and/or fringe development, which may have the potential to adversely affect these sites. Appropriate mitigation measures and opportunities for enhancement should be considered.</p> <p>Recommendations: See recommendations identified as part of the appraisal for CP5: Sustainable Design and Construction and CP4: Environment.</p>
13. Development in Hawkhurst	?	?	x	<p>Some good areas of urban ecology can exist on PDL sites. In the short to medium-term, effects resulting from the development of PDL sites within Hawkhurst is therefore uncertain.</p> <p>LNR sites are situated in proximity to the rural town of Hawkhurst. Results of the SHLAA show that approximately 37% of new housing identified for Hawkhurst (refer to the Spatial Strategy) will be able to be delivered on PDL sites. As such, this Policy may involve some greenfield land take and/or fringe development, which may have the potential to adversely affect these areas. Appropriate mitigation measures and opportunities for enhancement should be considered.</p> <p>Recommendations: See recommendations identified as part of the appraisal for CP5: Sustainable Design and Construction and CP4: Environment.</p>
14. Development in the Villages	?	?	x	<p>Some good areas of urban ecology can exist on PDL sites. In the short to medium-term, effects resulting from the development of PDL sites within the Villages is therefore uncertain.</p> <p>Large areas of LNR's and SSSI's are situated in proximity to the Borough's Villages. In the longer term, results of the SHLAA shows that between 38% and 100% of new housing identified for the villages (refer to the Spatial Strategy) will be able to be delivered on PDL sites. As such, this Policy may involve some greenfield land take and/or fringe development, which may have the potential to adversely affect these areas. Appropriate mitigation measures and opportunities for enhancement should be considered.</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<b>Recommendations:</b> See recommendations identified as part of the appraisal for CP5: Sustainable Design and Construction and CP4: Environment.
15. Development in the Rural Areas	-	✓	✓	<p>This policy seeks to identify opportunities and plan for new green routeways within and between settlements to encourage non-vehicular modes of transport. This will also present opportunities to enhance biodiversity within the rural area through the creation of linear wildlife corridors.</p> <p><i>Note: The ‘rural area’ refers to the areas outside the rural towns and villages. The specific effects of new development at rural towns Paddock Wood, Cranbrook and Hawkhurst and at villages have been appraised as part of Core Policies 11, 12, 13 and 14 above.</i></p>

### General Comments/Recommendations

The land release strategy identified in Core Policy 1 prioritises the development of PDL over the development of greenfield sites. It prioritises the release of development on PDL within the existing defined Limits to Built Development (LBD) of the Borough’s settlements, both to facilitate access to services while minimising the need to travel and to protect valuable features of the countryside and open space.

It should be noted that the SHLAA will be reviewed in 2015, at which point more PDL sites may become available for reuse.

In order to avoid potential adverse effects on nearby European Sites (in particular Ashdown Forest), the Appropriate Assessment undertaken in 2009 by Scott Wilson recommends that TWBC should monitor progress of the ongoing assessment and recreational management studies being undertaken by Wealden District Council on the Ashdown Forest SAC/SPA and be prepared to participate in any collaborative cross authority management plan or associated scheme that may ultimately be developed from these studies. Any such measures would need to be applied by TWBC through incorporated into future DPDs or SPDs.

In addition, the Appropriate Assessment identifies that if the increase in population resulting from the delivery of 6,000 new homes within the District would reduce the ratio of accessible natural greenspace to population, then new areas of accessible greenspace would need to be identified and delivered at a minimum rate of 1ha/1000 new population (this being Natural England’s Accessible Natural Greenspace Standard).

**Likelihood:** Medium

**Scale:** Potentially international depending on the type of ecological site affected.

**Permanence:** Permanent

**Effects:** Cumulative effects for protecting the Borough’s countryside and historic environment and improving efficiency in land use.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 11: TO PROTECT, ENHANCE AND MAKE ACCESSIBLE FOR ENJOYMENT, THE BOROUGH'S COUNTRYSIDE AND HISTORIC ENVIRONMENT

#### Sub-objectives

- 11.1 Would it protect, enhance or restore the Borough's natural environmental assets and attractive countryside (e.g. the Green Belt, parks and green spaces, common land, woodland and forests, AONBs, geological assets, etc)
- 11.2 Would it protect, enhance or restore the Borough's cultural and heritage assets (e.g. SAMs, Listed Buildings, Historic Parks and Gardens, Conservation Areas etc)?
- 11.3 Would it promote the accessibility of the Borough's countryside and historic environment in sustainable and well-managed ways?
- 11.4 Would it significantly affect the quality of landscapes, in the Countryside or in more urban settings?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	-	×	<p>Results of the SHLAA show that approximately 69% of new housing identified for RTW and Southborough combined (refer to the Spatial Strategy) will be able to be delivered on PDL sites. Development on PDL may therefore affect heritage assets. In addition, this Policy may involve some greenfield land take and/or fringe development in the long-term which may adversely impact the Borough's countryside and historic environment.</p> <p>The TWBC Landscape Character Assessment and Capacity Study identifies the potential for future expansion of some greenfield areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook without causing adverse effects for the Borough's countryside or historic environment, provided that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p> <p>Recommendations: Only permit new development in those areas in RTW capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.</p> <p>Likelihood: High</p> <p>Scale: Potentially national if AONBs are affected.</p> <p>Permanence: Permanent</p> <p>Effects: Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
10. Development in Southborough	-	-	×	<p>Southborough has a number of constraints in terms of Conservation Areas, a high number of listed buildings, Green Belt and AONB. Results of the SHLAA show that approximately 69% of new housing identified for RTW and Southborough combined (refer to the Spatial Strategy) will be able to be delivered on PDL sites. Development on PDL may therefore affect heritage assets. In addition, this Policy may involve some greenfield land take and/or fringe development in the long-term which may adversely impact the Borough's countryside and historic environment.</p> <p>The TWBC Landscape Character Assessment and Capacity Study identifies that potential for future expansion of some areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook, provided that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Recommendations:</b> Only permit new development in those areas in Southborough capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Potentially national if AONBs are affected.</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
11. Development in Paddock Wood	-	-	x	<p>Paddock Wood has no conservation areas, although there are a number of Important Open Spaces and Areas of Landscape Importance within the town boundary. Results of the SHLAA show that approximately 10% of new housing identified for Paddock Wood (refer to the Spatial Strategy) will be able to be delivered on PDL sites. Development on PDL may therefore affect heritage and landscape assets. In addition, this Policy may involve some greenfield land take and/or fringe development, which may adversely impact the Borough's countryside and historic environment.</p> <p>The TWBC Landscape Character Assessment and Capacity Study identifies that potential for future expansion of some areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook, provided that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p> <p><b>Recommendations:</b> Only permit new development in those areas in Paddock Wood capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Potentially national if AONBs are affected.</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
12. Development in Cranbrook	-	-	x	<p>Cranbrook has a number of constraints, including AONB, Special Landscape Areas, Historic Parks and Gardens, Conservation Areas and a number of Important Open Spaces or Areas of Landscape Importance. Results of the SHLAA show that approximately 76% of new housing identified for Cranbrook (refer to the Spatial Strategy) will be able to be delivered on PDL sites. Development on PDL may therefore affect heritage and landscape assets. In addition, this Policy may involve some greenfield land take and/or fringe development, which may adversely impact the Borough's countryside and historic environment.</p> <p>The TWBC Landscape Character Assessment and Capacity Study identifies that potential for future expansion of some areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook, provided that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p> <p><b>Recommendations:</b> Only permit new development in those areas in Cranbrook capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.</p> <p><b>Likelihood:</b> High</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>Scale: Potentially national if AONBs are affected.            Permanence: Permanent            Effects: Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
13. Development in Hawkhurst	-	-	x	<p>Hawkhurst has a number of constraints, including AONB, Special Landscape Areas, Historic Parks and Gardens, Conservation Areas and a number of Important Open Spaces or Areas of Landscape Importance. Results of the SHLAA show that approximately 37% of new housing identified for Hawkhurst (refer to the Spatial Strategy) will be able to be delivered on PDL sites. As such, this Policy may involve some greenfield land take and/or fringe development, which may adversely impact on the borough's historic and countryside environment.</p> <p>The TWBC Landscape Character Assessment and Capacity Study identifies that potential for future expansion of some areas around the main settlements of Tunbridge Wells, Paddock Wood, Hawkhurst and Cranbrook, provided that mitigation measures identified as part of the assessment are incorporated into development layout and design.</p> <p>Recommendations: Only permit new development in those areas in Hawkhurst capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.</p> <p>Likelihood: High            Scale: Potentially national if AONBs are affected.            Permanence: Permanent            Effects: Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
14. Development in the Villages	-	-	x	<p>The Borough's Villages have a number of constraints, including AONB, Special Landscape Areas, Historic Parks and Gardens, Conservation Areas and a number of Important Open Spaces and Areas of Landscape Importance. Results of the SHLAA shows that between 38 and 100% of new housing identified for the villages (refer to the Spatial Strategy) will be able to be delivered on PDL sites. As such, this Policy may involve some greenfield land take and/or fringe development, which may have the potential to adversely affect the borough's historic and countryside environment.</p> <p>Recommendations: Only permit new development in those areas in Villages capable of accommodating development as identified in the TWBC Landscape Character Assessment and Capacity Study, and ensure identified mitigation measures are incorporated into new developments.</p> <p>Likelihood: High            Scale: Potentially national if AONBs are affected.            Permanence: Permanent            Effects: Cumulative effects for conserving biodiversity and improving efficiency in land use.</p>
15. Development in the Rural Areas	-	✓	✓	<p>Operating a policy of restraint on general development should maintain the landscape character and quality of the countryside. Preserving, enhancing and where necessary restoring the interrelationship between the natural and built features of the landscape and encouraging development that seeks to maintain the local distinctiveness of particular localities will also have long-term benefits.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	

<p><i>Note: The 'rural area' refers to the areas outside the rural towns and villages. The specific effects of new development at rural towns Paddock Wood, Cranbrook and Hawkhurst and at villages have been appraised as part of Core Policies 11, 12, 13 and 14 above.</i></p>			
---	--	--	--

**General Comments/Recommendations**

The High Weald AONB is a national designation and as such, should be afforded the highest level of protection

**Likelihood:** Medium

**Scale:** Local

**Permanence:** Permanent

**Effects:** Cumulative effects for conserving biodiversity and improving efficiency in land use.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 12: TO IMPROVE TRAVEL CHOICE AND TO REDUCE THE NEED FOR TRAVEL, PARTICULARLY BY CAR/LORRY TO REDUCE ROAD CONGESTION

#### Sub-objectives

12.1 Would it promote more sustainable travel, particularly in areas with high congestion?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	✓	✓✓	✓✓	<p>The TWBC 2007 Accession Mapping Study identifies the main urban areas of RTW and Southborough as being the most accessible (in terms of both public transport and access to services and facilities) in the Borough. Delivering the vast majority of the Borough's needs for residential, retail, commercial, social and cultural developments within RTW and Southborough should therefore help to reduce the need to travel as well as offering the opportunity to promote sustainable transport.</p> <p>This Policy will also have benefits through contributing to an integrated approach to improve transport and movement into, and around, RTW.</p>
10. Development in Southborough	✓	✓✓	✓✓	<p>The TWBC 2007 Accession Mapping Study identifies the main urban areas of RTW and Southborough as being the most accessible (in terms of both public transport and access to services and facilities) in the Borough. Delivering the vast majority of the Borough's needs for residential, retail, commercial, social and cultural developments within RTW and Southborough should therefore help to reduce the need to travel as well as offering the opportunity to promote sustainable transport.</p> <p>This Policy will also have benefits through improving links to RTW and encouraging the uptake of sustainable transport modes including walking, cycling and public transport.</p>
11. Development in Paddock Wood	-	✓	✓	<p>Paddock Wood is well connected by public transport with excellent rail links to Tonbridge and London. However, more limited opportunities exist for mixed-use development to reduce the need to travel (in particular for combining employment and residential uses), given the flooding constraints to the north of Paddock Wood.</p> <p><b>Recommendations:</b> Ensure that workers have the opportunity to access sustainable modes of travel, particularly between residential and employment uses within Paddock Wood.</p>
12. Development in Cranbrook	-	✓	✓	<p>Accessibility modelling identifies the small rural town of Cranbrook to have good access to key services and facilities. Allowing redevelopment of these areas in keeping with their roles as rural service and facility providers should help to reduce the need to travel long distances to access services and facilities.</p>
13. Development in Hawkhurst	-	✓	✓	<p>Accessibility modelling identifies the small rural town of Hawkhurst to have good access to key services and facilities. Allowing redevelopment of these areas in keeping with their roles as rural service and facility providers should help to reduce the need to travel long distances to access services and facilities.</p>
14. Development in the Villages	-	-	-	<p>Accession Mapping identifies poor public transport accessibility between most villages in the Borough. Adverse effects should be reduced through resisting the loss of essential services/facilities and promoting opportunities to encourage walking, cycling and the use of public transport.</p>
15. Development in the Rural Areas	-	✓	✓	<p><b>Core Policy 15 involves a policy of restraint on general development. Given the limited or lack of public transport provision in the rural areas, this should avoid increases in the need for vehicular travel.</b></p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p>Furthermore, the policy encourages non-vehicular modes of transport between rural settlements and within the rural areas by:</p> <ul style="list-style-type: none"> <li>- ensuring that the existing network of public footpaths and bridleways are protected, maintained and improved; and</li> <li>- identifying opportunities and planning for new green routeways within and between settlements.</li> </ul>

**General Comments/Recommendations**

Commercial or housing development applications of more than 10 units should be required to demonstrate that alternatives to road transport are being utilised wherever practical and will minimise the distance necessary, including the number and length of vehicle journeys

In cases where there is no extra network or infrastructure capacity, mitigation should be expected to support transportation improvements directly linked to the development.

**Likelihood:** High

**Scale:** Regional

**Permanence:** Permanent

**Effects:** Effects for improving accessibility to all services and facilities, reducing poverty and social exclusion and improving health and wellbeing.



## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 13: TO REDUCE THE IMPACT OF RESOURCE CONSUMPTION BY USING SUSTAINABLY PRODUCED AND LOCAL PRODUCTS AND REDUCING WASTE GENERATION AND DISPOSAL

#### Sub-objectives

- 13.1 Would it promote the use of sustainably-sourced, and recycled, materials in construction and renovation?
- 13.2 Would it increase efficiency in water (e.g. water meters), energy and raw materials use?
- 13.3 Would it increase prevention, reuse, recovery and recycling of waste?
- 13.4 Would it promote sustainable waste management practices through the provision of a range of appropriate waste management facilities?
- 13.5 Would it reduce use of non-renewable resources?
- 13.6 Would it increase use of renewable energies?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	-	-	Reducing resource consumption should be required through sustainable design and construction policies (see the appraisal of Core Policy 5: Sustainable Design and Construction)
10. Development in Southborough	-	-	-	Reducing resource consumption should be required through sustainable design and construction policies (see the appraisal of Core Policy 5: Sustainable Design)
11. Development in Paddock Wood	-	-	-	Reducing resource consumption should be required through sustainable design and construction policies (see the appraisal of Core Policy 5: Sustainable Design and Construction)
12. Development in Cranbrook	-	-	-	Reducing resource consumption should be required through sustainable design and construction policies (see the appraisal of Core Policy 5: Sustainable Design and Construction)
13. Development in Hawkhurst	-	-	-	Reducing resource consumption should be required through sustainable design and construction policies (see the appraisal of Core Policy 5: Sustainable Design and Construction)
14. Development in the Villages	-	-	-	Reducing resource consumption should be required through sustainable design and construction policies (see the appraisal of Core Policy 5: Sustainable Design and Construction)
15. Development in the Rural Areas	-	✓	✓	Reusing existing rural buildings will have benefits for reducing waste and the reuse of materials.

#### General Comments/Recommendations

See recommendations identified as part of the appraisal of Core Policy 5.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 14: TO INCREASE ENERGY EFFICIENCY, AND THE PROPORTION OF ENERGY GENERATED FROM RENEWABLE SOURCES IN THE BOROUGH

#### Sub-objectives

- 14.1 Would it increase efficiency in energy use?  
 14.2 Would it provide for the establishment of renewable energy developments?  
 14.3 Would it promote the incorporation of small-scale renewables (e.g. photovoltaic cells and Combined Heat and Power Plants) in developments?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Development at the main urban area of RTW offers the greatest opportunity for the delivery of renewable energy technologies, although some renewable options may be restricted by heritage and amenity constraints. Heritage constraints may also restrict some development options (given the existing Conservation Areas), whilst morphological constraints resulting from the urbanised form of RTW may limit the ability to maximise natural heat and light gained through orientation.</p> <p><b>Recommendations:</b> Consider contributions towards the provision of offsite renewable or community heating schemes from developments unable to deliver onsite renewables due to morphological or heritage/amenity constraints.</p>
10. Development in Southborough	-	✓	✓	<p>On-site renewables are more likely to be delivered on larger sites. Development at the urban area of Southborough offers good opportunity for the delivery of renewable energy technologies, although some renewable options may be restricted by heritage and amenity constraints. Heritage constraints may also restrict some development options (given the existing Conservation Areas), whilst morphological constraints resulting from the urbanised form of Southborough may limit the ability to maximise natural heat and light gained through orientation.</p> <p><b>Recommendations:</b> Consider contributions towards the provision of offsite renewable or community heating schemes from developments unable to deliver onsite renewables due to morphological or heritage/amenity constraints.</p>
11. Development in Paddock Wood	-	✓	✓	<p>Paddock Wood is less restricted (in comparison to other Borough settlements) in terms of heritage constraints and therefore presents a good opportunity to deliver on-site renewables. However, morphological constraints may restrict some development options within Paddock Wood, which may limit the ability to maximise natural heat and light gained through orientation. In addition, in comparison to development at RTW and Southborough, smaller development would be less likely to meet the thresholds for on-site renewable energy provision, and heritage, landscape and amenity constraints may further restrict opportunities.</p> <p><b>Recommendations:</b> Financial contributions could be required for smaller-scale development or other cases where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy.</p> <p><b>Likelihood:</b> Medium  <b>Scale:</b> Local  <b>Permanence:</b> Permanent  <b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>
12. Development in Cranbrook	-	-	-	<p>Smaller development would be less likely to meet the thresholds for on-site renewable energy provision, and heritage, landscape and amenity constraints may further restrict opportunities.</p>

**SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT**

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Recommendations:</b> Financial contributions could be required for smaller-scale development or other cases where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>
13. Development in Hawkhurst	-	-	-	<p>Smaller development would be less likely to meet the thresholds for on-site renewable energy provision, and heritage, landscape and amenity constraints may further restrict opportunities.</p> <p><b>Recommendations:</b> Financial contributions could be required for smaller-scale development or other cases where on-site provision is not feasible; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>
14. Development in the Villages	-	-	-	<p>The development of smaller sites would be less likely to trigger the requirement for renewables.</p> <p><b>Recommendations:</b> Contributions could be required for smaller-scale development or other cases where on-site provision is not feasible.</p> <p><b>Likelihood:</b> High</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes, reducing pollution and reducing the need to travel.</p>
15. Development in the Rural Areas	-	-	-	<p>The development of smaller sites would be less likely to trigger the requirement for renewables.</p> <p><b>Recommendations:</b> Contributions could be required for smaller-scale development or other cases where on-site provision is not feasible.</p> <p><b>Likelihood:</b> Medium</p> <p><b>Scale:</b> Local</p> <p><b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for the provision of decent, sustainably constructed and affordable homes and reducing pollution.</p>

**General Comments/Recommendations**

Subject to viability constraints, consider financial contributions towards the provision of offsite renewable or community heating schemes from developments unable to deliver onsite renewables; however measures to reduce energy demand should be sought in the first instance in accordance with the energy hierarchy.

**Likelihood:** High

**Scale:** Local

**Permanence:** Permanent

**Effects:** Cumulative effects for addressing the causes of climate change, reducing poverty and social exclusion and ensuring everyone has the opportunity to live in a decent, sustainably constructed and affordable home.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 15: TO ENSURE HIGH AND STABLE LEVELS OF EMPLOYMENT SO EVERYONE CAN BENEFIT FROM THE ECONOMIC GROWTH OF THE BOROUGH

#### Sub-objectives

15.1 Would it provide employment opportunities that match the skills of the local workforce?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tunbridge Wells	✓	✓✓	✓✓	The Index of Multiple Deprivation (IMD) 2004 shows the highest rates of unemployment in wards within RTW and Southborough. Focusing the majority of development in RTW will strengthen the economic base of RTW and provide jobs in an area with the greatest need. Good existing public transport provision will also mean new employment opportunities are accessible.
10. Development in Southborough	✓	✓✓	✓✓	The Index of Multiple Deprivation (IMD) 2004 shows the highest rates of unemployment in wards within RTW and Southborough. Directing development to Southborough will provide jobs in an area with the greatest need. Good existing public transport provision will also mean new employment opportunities are accessible.
11. Development in Paddock Wood	✓	✓✓	✓✓	This Policy would create new employment opportunities by: promoting the redevelopment of the Economic Development Area for current and future business/employment needs; facilitating the provision of smaller, more flexible and higher quality commercial and industrial units; and delivering 422sqm (net) of additional comparison floorspace.  Given the existing 'commuter culture' at Paddock Wood due to convenient public transport links to Tonbridge and beyond, care should be taken to ensure new jobs are directed towards local people.
12. Development in Cranbrook	✓	✓	✓	This Policy would have long-term benefits by maintaining and securing the long-term function of Cranbrook as a provider of employment opportunities to local residents and a wider rural hinterland.
13. Development in Hawkhurst	✓	✓	✓	This Policy would have long-term benefits by maintaining and securing the long-term function of Hawkhurst as a provider of employment opportunities to local residents and a wider rural hinterland. The IMD (2004) also shows higher rates of unemployment in wards within Hawkhurst. This policy would therefore help to address existing unemployment levels in this area.
14. Development in the Villages	✓	✓	✓	This Policy would have long-term benefits by retaining existing employment sites. Promoting alternative modes of transport and infrastructure improvements, in particular walking, cycling and the use of public transport, will ensure accessibility for all village residents to employment opportunities elsewhere in the Borough
15. Development in the Rural Areas	-	✓	✓	This Policy would have long-term benefits through strengthening the rural economy and safeguarding its long-term sustainability by providing opportunities for commercial activities and encouraging employment uses related to the land. Encouraging non-vehicular modes of transport between rural settlements and within the rural areas will also ensure accessibility for all residents of rural areas to employment opportunities elsewhere in the Borough.

#### General Comments/Recommendations

Subject to viability, local labour agreements could be considered for major developments to, where necessary, enable local people to access jobs, apprenticeships or jobs placements in the construction and and/or end use phases of developments in order to meet the wider needs of the community.

**Likelihood:** High

**Scale:** Local

**Permanence:** Permanent

**Effects:** Cumulative effects for stimulating and sustaining economic growth and reducing poverty and social exclusion.

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

### OBJECTIVE 16: TO STIMULATE AND SUSTAIN ECONOMIC GROWTH AND COMPETITIVENESS ACROSS THE BOROUGH

#### Sub-objectives

16.1 Would it maintain/increase the opportunities for local employment across the Borough?

16.2 Would it sustain the vitality and viability of the village?

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
9. Development in Royal Tonbridge Wells	✓	✓✓	✓✓	<p>This Policy would have benefits by providing additional employment floorspace where necessary to improve the qualitative offer, increasing the proportion of B1 office space in the town centre, and providing 23,403 sqm of new net comparison retail floorspace, including the planned expansion of Royal Victoria Place.</p> <p>This development would also stimulate the economic development of the wider Regional Hub (RTW with Tonbridge). This would maximise borough-wide economic benefits by strengthening the economic growth of the Borough in the long-term and also ensure the ongoing competitiveness of RTW in the region.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>Subject to economic viability considerations, given the good existing public transport provision for the area, the Council could also require developers to contribute smaller affordable work spaces (or offsite contributions) for employment uses (since small start-up enterprises are likely to be more reliant on public transport).</li> </ul> <p><b>Likelihood:</b> High <b>Scale:</b> Regional <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.</p>
10. Development in Southborough	✓	✓✓	✓✓	<p>This policy will have benefits by aiming to deliver 422 sqm of net additional comparison floorspace and to reinforce the function of Southborough as a town centre through a new mixed-use development to provide retail, commercial and community facilities.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>Subject to economic viability considerations, given the good existing public transport provision for the area, the Council could also require developers to contribute smaller affordable work spaces (or offsite contributions) for employment uses (since small start-up enterprises are likely to be more reliant on public transport).</li> </ul> <p><b>Likelihood:</b> High <b>Scale:</b> Local <b>Permanence:</b> Permanent <b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.</p>
11. Development in Paddock Wood	✓	✓✓	✓✓	<p>Promoting the redevelopment of the Paddock Wood Economic Development Area for current and future business/employment needs, encouraging and facilitating the provision of smaller, more flexible and higher quality commercial and industrial units and delivering an additional (net) 422 sqm of comparison floor space will all have benefits for stimulating and sustaining economic growth.</p> <p><b>Recommendations:</b> None <b>Likelihood:</b> High <b>Scale:</b> Regional <b>Permanence:</b> Permanent</p>

## SUSTAINABILITY APPRAISAL – CORE STRATEGY SUBMISSION REPORT

Core Policies	Appraisal of Effects			Explanation and Comments
	ST	MT	LT	
				<p><b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.</p>
12. Development in Cranbrook	✓	✓✓	✓✓	<p>This Policy will have benefits by delivering 1,118 (net) additional comparison retail floorspace to secure the long-term viability and vitality of Cranbrook as a small rural town.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.</p>
13. Development in Hawkhurst	✓	✓✓	✓✓	<p>This policy will have benefits by delivering 411 (net) sqm of additional comparison retail floor space to secure the long-term function of Hawkhurst as a rural service provider.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.</p>
14. Development in the Villages	-	✓	✓	<p>This Policy will have long-term benefits by retaining existing employment sites.</p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.</p>
15. Development in the Rural Areas	-	✓	✓	<p><b>This Policy will have long-term benefits by strengthening the rural economy and safeguarding its long-term sustainability by providing opportunities for commercial activity which utilise rural buildings and resources appropriately. Improvements to non-vehicular modes of transport would also help to strengthen the rural economy.</b></p> <p><b>Recommendations:</b> None  <b>Likelihood:</b> High  <b>Scale:</b> Local  <b>Permanence:</b> Permanent</p> <p><b>Effects:</b> Cumulative effects for providing employment opportunities and reducing poverty and social exclusion.</p>