

Tunbridge Wells Borough Local Plan



Sustainability Appraisal Scoping Report

Final Report

October 2016

Document History

The following tables detail the various Sustainability Appraisal reports that have been produced to date.

Sustainability Appraisal Scoping Report

Date	Title	Content
June 2016	Sustainability Appraisal Scoping Report Consultation Draft	Issue for stand alone consultation
October 2016	Sustainability Appraisal Scoping Report Final Report	Updated following consultation and consideration of new studies

Sustainability Appraisal Assessment Report

Date	Title	Content
<i>May 2017 (expected)</i>	Sustainability Appraisal Assessment Report Issues and Options Stage Consultation Draft	Issue for consultation alongside the Local Plan Issues and Options Report
<i>Autumn 2017 (expected)</i>	Sustainability Appraisal Assessment Report Issues and Options Stage Final Report	Updated following consultation and consideration of any new information

All final reports are available in the Planning Policy section of the Tunbridge Wells Borough Council website.

Non Technical Summary

This report describes the process that has been undertaken to establish a method for testing whether the new Tunbridge Wells Borough Local Plan contributes to sustainable development.

The process is a legal requirement under the Planning and Compulsory Purchase Act 2004 and has been completed in five steps that are summarised below.

Identifying and reviewing relevant plans, programmes and strategies

The key findings from this review were that the topics of air quality, biodiversity, climate change, cultural heritage and archaeology, energy, flooding, housing, landscape, noise, waste and water need to be recognised by the sustainable development testing method.

Collecting baseline information

A large number of indicators were analysed at this stage to represent the full breadth of social, economic and environmental issues.

Identifying key sustainability issues

A review of plans, programmes and strategies was undertaken, and considered alongside the analysis of baseline information in order to determine the key issues for the borough.

Under the economic theme, the topics of business growth, education, employment, services and facilities, and travel were determined to be key issues.

Under the environmental theme, the topics of air quality, biodiversity, climate change, energy, heritage, land use, landscape, noise, resources, waste and water were determined to be key issues.

Under the social theme, the topics of deprivation, education, equality, health, housing and transport were determined to be key issues.

Developing sustainability objectives

The key issues were then refined to develop 19 objectives against which to assess potential impacts of the Local Plan.

Following this, a scoring method was proposed that uses an eight point scale to score impacts ranging from very positive to very negative or unknown. A description of how cumulative effects would be considered was also provided.

Consultation

Finally, an explanation was given of how consultation was undertaken with the three statutory consultation bodies: Natural England, Historic England and the Environment Agency, and an additional range of interested parties.

Following consultation, the findings of this report were fed back to those processing the new Local Plan so that they can be taken into account when preparing the document.

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1 Introduction

1.1 Sustainability Appraisal Background

1.1.1 A Sustainability Appraisal is required during the preparation of a Local Plan by the Planning and Compulsory Purchase Act 2004 to ensure compliance with the requirements of the Strategic Environmental Assessment Directive. Its purpose is to help the Local Authority assess how effectively the Local Plan contributes to sustainable development.

1.1.2 There are five key stages in the preparation of a Sustainability Appraisal that are carried out alongside the preparation of a Local Plan (see Figure 1).

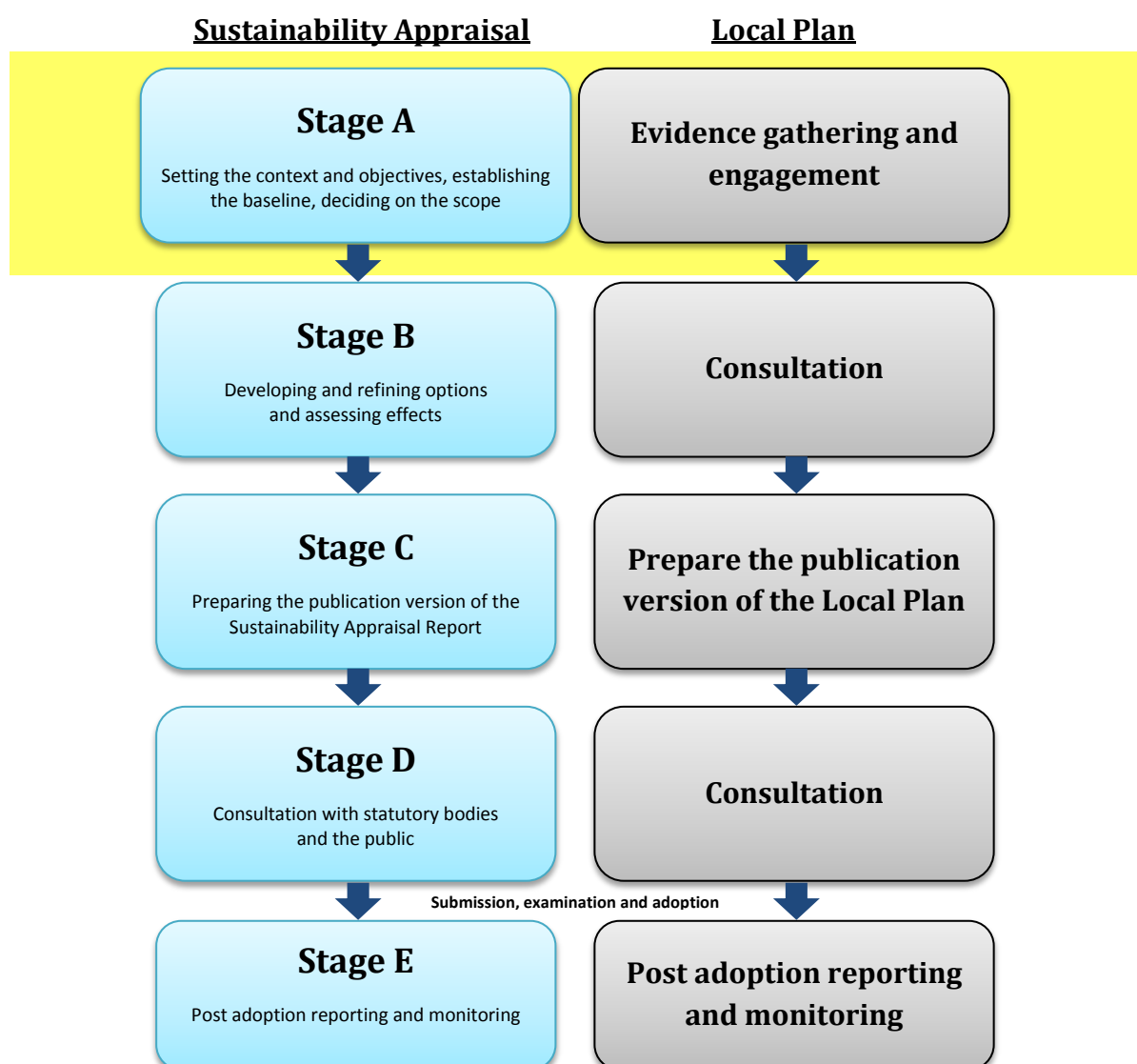
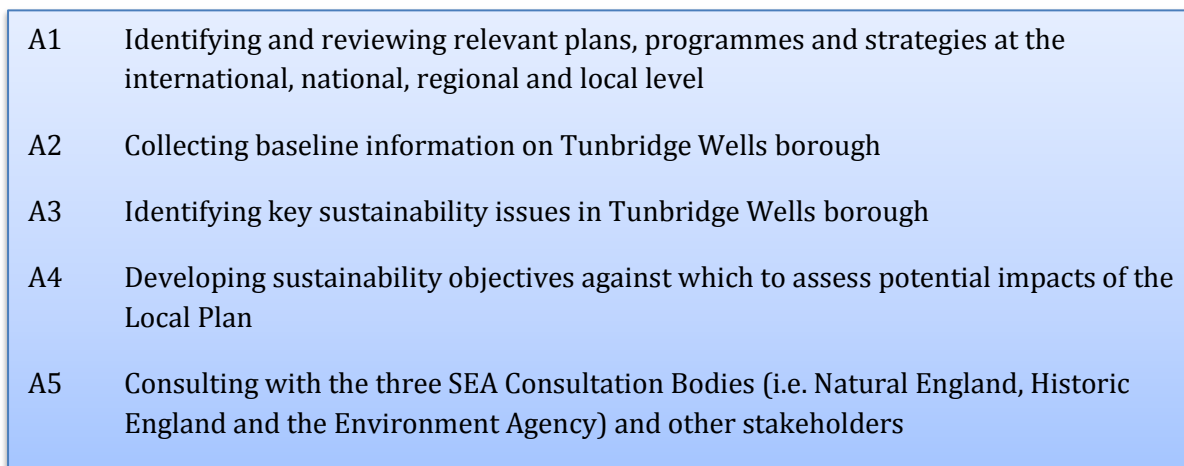


Figure 1. Key stages of Local Plan preparation and the relationship with the sustainability appraisal process. Adapted from Planning Practice Guidance Reference 11-013-20140306. **Yellow highlight** indicates current stage of work.

1.2 Purpose of this Report

1.2.1 This report represents Stage A of the process. Stage A is divided into five further sub-processes (see Figure 2).



A1	Identifying and reviewing relevant plans, programmes and strategies at the international, national, regional and local level
A2	Collecting baseline information on Tunbridge Wells borough
A3	Identifying key sustainability issues in Tunbridge Wells borough
A4	Developing sustainability objectives against which to assess potential impacts of the Local Plan
A5	Consulting with the three SEA Consultation Bodies (i.e. Natural England, Historic England and the Environment Agency) and other stakeholders

Figure 2. The five sub-processes that form Stage A of the Sustainability Appraisal.

1.2.2 The outcomes of these five sub-processes are described in Chapters 2-6 of this report, and a reminder of which sub-process is being addressed within this report is shown in the margin next to each chapter.

The Stage A
Sub processes
are shown
within the
margins

1.2.3 A specific report for Stage A is not a legal requirement. For this reason, this document is intended to be a succinct description of the outcome of Stage A only. The reader should not consult this document for detailed background information on the borough, Local Plan process or legislative context.

2 Relevant Plans, Policies and Programmes

Stage A1 2.1 Review of Documents

- 2.1.1 A Sustainability Appraisal is required to identify and review relevant sustainability plans, programmes and strategies, at the international, national, regional and local level (aka “Stage A1”). This process has been completed and is summarised in Appendix A.
- 2.1.2 It is important to note that this review is a snapshot in time only. The review of new plans, policies, programmes and strategies will continue throughout the process of preparing of the Local Plan. This is particularly pertinent given the decision of the UK to withdraw from the European Union. After 2019, the UK will not be bound by the rulings of the European Court of Justice. The format legislation will take is unknown.

2.2 Key findings

- 2.2.1 Key findings from this review are detailed below in Table 1.

Table 1. Key findings from the review of plan, policies and programmes shown in Appendix A and relevant to the sustainability of the Local Plan

Key finding	Impact upon new Local Plan	Implication for Sustainability Appraisal process
Air quality must be improved	The new Local Plan should include policies to reduce private car use, promote walking, cycling, public transport, low emission vehicles and protect the AQMA and other areas of poor air quality.	The SA should include an objective that focuses on improving air quality and the baseline review should include indicators.
Biodiversity requires conservation and enhancement	The new Local Plan should include policies to promote biodiversity conservation and enhancement.	The SA should include an objective to conserve and enhance biodiversity and the baseline review should include indicators where available.
Climate change is a serious problem with far reaching consequences	The new Local Plan should include policies that limit climate change and ensure the borough can adapt to expected changes	The SA should include an objective that focuses on climate change mitigation and adaptation and the baseline review should include relevant indicators.

Key finding	Impact upon new Local Plan	Implication for Sustainability Appraisal process
Cultural heritage and archaeology requires protection and enhancement	The new Local Plan should include policies to promote cultural heritage and archaeology protection and enhancement where applicable.	The SA should include an objective to conserve and enhance cultural heritage and archaeology, and the baseline review should include indicators where available.
Energy reduction and low and zero carbon energy sources are needed	The new Local Plan should include policies that reduce energy and promote low and zero carbon energy sources	The SA should include an objective that focuses on energy reduction and promotion of low and zero carbon energy sources, and the baseline review should include relevant indicators.
Flooding prevention is necessary in the borough	The new Local Plan should include policies that prevent flooding	The SA should include an objective that focuses on flood prevention and the baseline review should include relevant indicators.
Housing demand is high	The new Local Plan should plan for increased housing needs	The SA should include an objective that focuses meeting housing needs and the baseline review should include relevant indicators.
Landscape requires protection and enhancement	The new Local Plan should include policies to promote protection and enhancement of the landscape and resident's enjoyment of the countryside.	The SA should include an objective to conserve and enhance the landscape and resident's enjoyment of the countryside. The baseline review should include indicators where available.
Key local economic issues include the rural economy ¹ , employability, place-making, enterprise and connectivity.	The new Local Plan should include policies that promote and develop these identified issues	The SA should include objectives that incorporate these key economic issues and the baseline review should include relevant indicators.
Existing and future land use change puts soils at risk	The new Local Plan should include policies to promote protection of soils and reduction in contamination	The SA should include an objective that focuses on land use and the baseline review should include relevant indicators.
Noise pollution must be reduced	The new Local Plan should include policies that reduce and improves noise levels in sensitive areas	The SA should include an objective that focuses on noise pollution prevention and improvement, and the baseline review should include relevant indicators.
Waste reduction and recycling must improve	The new Local Plan should include policies that reduce waste and improve recycling rates in the borough	The SA should include an objective that focuses on waste reduction and improvement in recycling rates, and the baseline review should include relevant indicators.

¹ In this context, the rural economy is defined as land-based rural business such as agricultural and woodland management.

Key finding	Impact upon new Local Plan	Implication for Sustainability Appraisal process
Water quality requires improvement	The new Local Plan should include policies that protect and improve water quality	The SA should include an objective that focuses on water quality protection and improvement, and the baseline review should include relevant indicators.
Water resources are stressed	The new Local Plan should include policies that encourage sustainable water use	The SA should include an objective that focuses on water resource protection and the baseline review should include relevant indicators.

Stage A2

3 Baseline Information

3.1 Introduction

- 3.1.1 Stage A2 of the scoping exercise involves collecting all available baseline information on Tunbridge Wells borough. This task was completed by reviewing data for all the indicators shown below in Figure 3, Figure 4 and Figure 5.
- 3.1.2 For clarity, the indicators are organised according to the three themes of sustainable development: social, economic and environment. However, it should be noted that, although each indicator is categorised under only one theme, many of these indicators can be categorised under multiple themes. For example, 'green open space' can be categorised under both the social and environmental themes.
- 3.1.3 It is also important to note that these indicators are a snapshot in time only. The analysis of baseline data will continue throughout the process of preparing of the Local Plan as new data becomes available and existing data is updated.
- 3.1.4 The indicators that have been chosen reflect the Council's knowledge of existing issues within the borough and new issues that are likely to become pertinent in future years.
- 3.1.5 Data sources for each indicator are detailed in Appendix B.

3.2 Social

- 3.2.1 Figure 3 below lists the specific indicators that have been used to determine the social issues within the borough. An analysis of trends, key findings, targets and implications for the new Local Plan is contained in Appendix C.



Figure 3. Indicators used to determine the social issues within the borough.

3.3 Economic

3.3.1 Figure 4 below lists the specific indicators that have been used to determine the economic issues within the borough. An analysis of trends, key findings, targets and implications for the new Local Plan is contained in Appendix D.



Figure 4. Indicators used to determine the economic issues within the borough.

3.4 Environment

3.4.1 Figure 5 below lists the specific indicators that have been used to determine the environmental issues within the borough. An analysis of trends, key findings, targets and implications for the new Local Plan is contained in Appendix E.



Agricultural and woodland productivity
Air Quality Management Areas
Aircraft/rail noise
Area of Outstanding Natural Beauty
Average total energy consumption
Biodiversity Opportunity Areas
Climate change
CO₂ emissions per capita
Construction materials
Construction waste
Consumption of water
Demolition and rebuild
Energy generation
Exceedances of air quality targets for nitrogen dioxide and particulate matter
Features of historical value
Green Belt
Green Infrastructure and trees
Groundwater recharge
Historic Farmsteads
Household waste
Household waste diverted from landfill
Landscape Character and Quality (historic and existing)
Light pollution
New homes built on previously developed land
Number of car club vehicles for hire
Number of electric vehicle charge points
Premature deaths from poor air
Priority B lines
Properties at risk from flooding
Road Noise
Sites of biodiversity value
Sites of geological value
SSSIs units in favourable or recovering condition
Water body quality
Water supply and stress
Wildlife sites of international importance
Woodland Cover

Figure 5. Indicators used to determine the environmental issues within the borough.

4 Sustainability Issues

Stage A3

4.1 Introduction

4.1.1 Stage A3 of the scoping process is identifying key sustainability issues in Tunbridge Wells borough. In line with the three themes of sustainable development, the issues have been organised below into the categories of social, economic and environmental. However, overlap between issues does occur as explained in paragraph 3.1.2.

4.2 Social

4.2.1 Table 2 below summarises all the key social issues within the borough.

Table 2. Social issues within Tunbridge Wells Borough

Topic	Key Issues
Deprivation	<ul style="list-style-type: none"> • Pockets of deprivation • High rates of fuel poverty
Education	<ul style="list-style-type: none"> • Increasing demand for secondary school places due to large population of secondary school aged children • High number of 16-18 year olds NEET
Equality	<ul style="list-style-type: none"> • Poor physical activity rates for low incomes population groups • Social mobility problems caused by selective schools
Health	<ul style="list-style-type: none"> • Demand for elderly care services due to aging population and increased life expectancy • Potential demand for local specialist health care for asthma, stroke, mental illness and cancer sufferers • Poor physical activity rates for at risk population groups • Pockets of health deprivation • Need for mental health support services • Need for accessible open or linear green spaces, recreation, indoor & outdoor sport facilities
Housing	<ul style="list-style-type: none"> • Increasing demand for social rented housing due to high house price earnings ratio • Increasing life expectancy fuelling demand for housing suitable for the elderly • Continued demand for 2 and 3 bed market housing to suit expanding families and older households downsizing • Limited supply of land due to constraints in borough. Housing targets not being met. • High rates of excess winter mortality fuelled by unsuitable insulation in older properties • Demand for affordable housing increases when supply of social rented housing decreases
Transport	<ul style="list-style-type: none"> • Priority transport projects in need of support • Very high demand for rail services • Poor cycling rates for all but the most enthusiastic cyclists • Poor rural bus services

4.3 Economic

4.3.1 Table 3 below summarises all key economic issues within the borough.

Table 3. Economic issues within Tunbridge Wells Borough

Topic	Key Issues
Business Growth	<ul style="list-style-type: none"> • Declining new business survival rates • Significant contributions to the local economy from professional and financial, health and education and construction-related industries • The Knowledge Economy is significant and growing rapidly • Loss of economic floor space in preference for housing
Education	<ul style="list-style-type: none"> • High proportion of highly qualified residents
Employment	<ul style="list-style-type: none"> • Lack of suitable employment opportunities in key wards
Services & Facilities	<ul style="list-style-type: none"> • Relatively small contribution to the local economy from tourism • Lack of superfast broadband connectivity in 5% of the borough • Services and facilities lacking in some rural settlements
Travel	<ul style="list-style-type: none"> • High proportion of residents commuting to London

4.4 Environmental

4.4.1 Table 4 below summarises all key environmental issues within the borough.

Table 4. Environmental issues within Tunbridge Wells Borough

Topic	Key Issues
Air	<ul style="list-style-type: none"> • NO₂ targets being exceeded along the A26 in Royal Tunbridge Wells (an AQMA) • Scope to improve opportunities for low emission vehicles including further electric vehicle charge points and other technologies • Scope to continue expansion of existing car club • Scope to promote other shared transport options and all forms of active travel including cycling and walking • Premature death from poor air quality
Biodiversity	<ul style="list-style-type: none"> • Numerous sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA) • Recreational pressure and nitrogen deposition on the Ashdown Forest SAC and SPA • SSSIs in favourable or recovering condition below target • Priority habitats need restoration and expansion to reduce fragmentation and create ecological networks
Climate Change &	

Topic	Key Issues
Energy	<ul style="list-style-type: none"> • Warmer, drier summers and warmer, wetter winters will mean more pressure on agriculture, health services, transport network, ecology etc. • Carbon and energy reduction targets are not being consistently met • Opportunities to utilise biomass in the borough are rarely exploited • Opportunities to install community heating schemes are not yet exploited
Heritage	<ul style="list-style-type: none"> • Borough is rich in heritage assets and sites of heritage value that are at risk from development
Land use	<ul style="list-style-type: none"> • Green belt occupies 22% of the borough • Greenfield land is under pressure for housing development • Best and most versatile agricultural land is under pressure for housing development • Contaminated land puts human health and the environment at risk
Landscape	<ul style="list-style-type: none"> • High Weald AONB washes over 70% of the borough • Woodland management would provide various benefits • Ancient woodland occupies 16% of the borough • Green infrastructure needs strengthening • Historic landscape character and quality under threat from development
Noise	<ul style="list-style-type: none"> • Various stretches of road declared Important Areas for Road Noise • Gatwick flight path in west of borough
Resources	<ul style="list-style-type: none"> • Demolition and rebuild projects are common in the borough and have a large carbon footprint • Responsible sourcing and low environmental impact materials are currently not fully considered in new development
Waste	<ul style="list-style-type: none"> • Household waste reduction has not significantly declined in the past 4 years • Over 50% of waste is sent to landfill and diversion rates have not significantly improved in the past 10 years • Construction waste will increase with pressure to build new homes
Water	<ul style="list-style-type: none"> • Various parts of the borough are located in flood zones 2 and 3 • Groundwater quality is defined as failing • Water bodies are under pressure from agriculture, water industry and rural land management activities and many are not achieving 'good' status for ecology • Water consumption rates are higher than both the national and regional average • The borough is in an area defined as experiencing serious water stress

4.5 Cumulative Effects

- 4.5.1 The consideration of issues should not be carried out in isolation. Many of the issues identified in Table 2, Table 3 and Table 4 are interconnected and thus have potential to worsen when considered in unison.
- 4.5.2 Likewise, influences outside of the borough boundaries must be considered as there is potential for issues to be exacerbated by the projects and plans underway in neighbouring local authorities and the region.
- 4.5.3 With reference to the methodology of Cooper (2004)², a summary of the key cumulative effects is given in Table 5 below.

Table 5. Potential cumulative effects that must be considered by the Sustainability Appraisal.

Description of Cumulative Effect	Source for up to date information
Allocation of housing and development sites across the borough	New Local Plan and TWBC social housing waiting list.
Approved planning applications for non allocated housing and development sites across the borough	Development Management department at TWBC
Housing, development and infrastructure needs of neighbouring Local Authorities	Local Plans for Wealden, Ashford, Maidstone, Rother and Sevenoaks Local Authorities
Transport projects to be implemented by national bodies (within or outside the borough)	Highways England, Network Rail and the National Infrastructure Commission
Projects to be implemented by utility companies (within or outside the borough)	South East Water, Southern Water, UK Power Networks
Education projects to be implemented by county council (within or outside the borough)	Kent County Council East Sussex County Council
Failure to deliver on current housing targets for the borough bringing about greater need in the future	Latest SHMA and annual monitoring reports.

- 4.5.4 When preparing the Sustainability Appraisal, the sources of up to date information listed in Table 5 will be accessed to determine if cumulative effects are likely to arise.

² Cooper, L. M. (2004) Guidelines for Cumulative Effects Assessment in SEA of Plans. EPMG Occasional Paper 04/LMC/CEW, Imperial College London

5 Framework and Methodology

5.1 Objectives

5.1.1 The consequence of the review of all relevant sustainability plans, programmes and strategies (Chapter 2), and all baseline indicators (Chapter 3) is that objectives for the Sustainability Appraisal can be created.

5.1.2 Table 6 below lists the 19 Sustainability Objectives that have been created for Tunbridge Wells borough.

Table 6. Sustainability Objectives for Tunbridge Wells Borough

Num.	Topic	Objective
1	Air	Reduce air pollution
2	Biodiversity	Protect and enhance biodiversity and the natural environment
3	Business Growth	Encourage business growth and competitiveness
4	Climate Change & Energy	Reduce carbon footprint and adapt to predicted changes
5	Deprivation	Reduce poverty and assist with regeneration
6	Education	Improve educational attainment and enhance the skills base
7	Employment	Facilitate and support employment opportunities
8	Equality	Increase social mobility and inclusion
9	Health & Wellbeing	Improve health and wellbeing, and reduce health inequalities
10	Heritage	Preserve and enhance historical and cultural heritage assets
11	Housing	Provide sufficient housing to meet identified needs
12	Land use	Protect soils, and reuse previously developed land and buildings
13	Landscape	Protect and enhance landscape and townscape
14	Noise	Reduce noise pollution
15	Resources	Reduce the impact of resource consumption
16	Services & Facilities	Improve access to and range of key services and facilities
17	Travel	Improve travel choice and reduce the need to travel by private vehicle
18	Waste	Reduce waste generation and disposal
19	Water	Manage flood risk and conserve, protect and enhance water resources

5.1.3 See Appendix F for a table that links each objective to recommendations for the new Local Plan.

5.1.4 All these objectives have been tested and found to be compatible with the definition the NPPF provides for sustainable development (Appendix G). The compatibility of objectives with one another has also been identified (Figure 6) with further commentary on why conflicts have been predicted in Table 7.

1																			
2	✓																		
3	x	x																	
4	✓	x	x																
5	?	?	?	?															
6	✓	?	?	?	✓														
7	?	?	✓	✓	✓	✓													
8	?	?	?	?	✓	✓	✓												
9	✓	✓	x	✓	✓	?	✓	✓											
10	✓	?	x	x	?	?	?	?	✓										
11	x	x	x	x	x	x	x	?	x	x									
12	?	✓	x	✓	?	?	?	?	?	✓	x								
13	?	✓	x	x	?	?	?	?	✓	✓	x	✓							
14	✓	✓	x	?	?	?	?	?	✓	?	x	?	?						
15	✓	✓	x	✓	?	?	?	?	?	?	x	✓	?	?					
16	?	?	?	?	?	?	✓	✓	✓	?	x	?	?	?	?				
17	✓	?	x	✓	?	?	✓	?	✓	?	?	?	?	✓	✓	✓			
18	✓	?	x	✓	?	?	?	?	?	?	x	✓	?	?	✓	?	?		
19	?	✓	x	✓	?	?	?	?	?	?	x	✓	?	?	✓	?	?	?	
OBJECTIVES	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	Air	Biodiversity	Business Growth	Climate Change & Energy	Deprivation	Education	Employment	Equality	Health & Wellbeing	Heritage	Housing	Land Use	Landscape	Noise	Resources	Services & Facilities	Travel	Waste	Water

Figure 6. Compatibility testing of Sustainability Objectives.

- ✓ Objectives are compatible and/or enhance one another
- x Objectives incompatible and/or conflict
- ? Objectives have no clear relationship or relationship is uncertain

Table 7. Conflicts between Sustainability Objectives

Objectives	Conflict
(11) Housing & (6) Education	Meeting housing needs will increase demand for school places
(11) Housing & (16) Services & Facilities	Meeting housing needs may increase pressure on existing services and facilities
(11) Housing & (3) Business Growth (7) Employment	Meeting housing needs may reduce economic floor space
(11) Housing & (4) Climate Change & Energy	Meeting housing needs could increase the borough's carbon footprint
(11) Housing & (5) Deprivation	Expense of purchasing a home may reduce disposable income
(11) Housing & (19) Water	Meeting housing needs will increase water consumption and could exacerbate flood risk and threaten water quality
(11) Housing & (1) Air (14) Noise	Meeting housing needs will increase traffic
(11) Housing & (2) Biodiversity (9) Health & Wellbeing (12) Land Use (13) Landscape	Meeting housing needs requires development on greenfield sites and may impact upon the Ashdown Forest SPA and SAC, and the High Weald AONB.
(11) Housing & (10) Heritage	Meeting housing needs could affect the setting of existing heritage assets Insulation for older buildings may alter their appearance
(11) Housing & (18) Waste	Meeting housing needs will increase waste
(11) Housing & (15) Resources	Meeting housing needs will increase the impact of resource consumption
(3) Business Growth & (1) Air (14) Noise (17) Travel	Supporting business growth could increase traffic and put increased pressure on public transport networks
(3) Business Growth & (2) Biodiversity (9) Health & Wellbeing (12) Land Use (13) Landscape	Supporting business growth may require development on greenfield sites with landscape and biodiversity importance.
(3) Business Growth & (4) Climate Change & Energy	Supporting business growth could increase the borough's carbon footprint
(3) Business Growth & (10) Heritage	Supporting business growth could affect the setting of existing heritage assets
(3) Business Growth & (18) Waste	Supporting business growth will increase waste
(3) Business Growth & (15) Resources	Supporting business growth will increase the impact of resource consumption
(3) Business Growth & (19) Water	Supporting business growth will increase water consumption and could exacerbate flood risk and threaten water quality
(4) Climate Change & (2) Biodiversity & Energy (13) Landscape (10) Heritage	Some renewable energy technologies can impact negatively on landscape character, biodiversity and heritage assets
(4) Climate Change & (1) Air & Energy	Biomass installation may result in poor air quality

5.2 Proposed Methodology

5.2.1 In order to determine whether the new Local Plan is compatible with the Sustainability Objectives identified by this report, a simple scoring methodology is proposed similar to that used for the Site Allocations Local Plan, except with a wider range to follow feedback from a planning appeal on the subject.

5.2.2 Scores are chosen from an eight point scale of impact as shown below.

Unknown or Mixed	Very Negative	Negative	Slightly Negative	Neutral	Slightly Positive	Positive	Very Positive
?	---	--	-	0	+	++	+++

5.2.3 Accompanying this scoring system will be a commentary box containing a written description to help justify the scores applied where a topic could be subjective.

5.2.4 When determining what score should be applied for environmental issues, the criteria identified by the SEA Directive would be referred to (see Figure 7).

- the probability, duration, frequency and reversibility of the effects
- the cumulative nature of the effects
- the risks to human health or the environment (e.g. due to accidents)
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage,
 - exceeded environmental quality standards or limit values,
 - intensive land-use
 - the effects on areas or landscapes which have a recognised national, community or international protection status.

Figure 7. Criteria listed by the SEA Directive for determining the likely significance of effects.

- 5.2.5 For social and economic issues, professional judgement will be used to determine a score.
- 5.2.6 The various aspects of the new Local Plan will be judged and scored in their own right and not against one another.
- 5.2.7 When applying scores, it will normally be assumed that mitigation measures are not available. Instead, suggestions of how mitigation can be applied will be included in a commentary box. This aspect will be described in further detail in the Stage B Sustainability Appraisal Report.

Stage A5 6 Consultation

- 6.1.1 It is a legal requirement that local authorities consult with statutory consultation bodies when deciding on the scope and level of detail of information that is to be included within the Sustainability Appraisal for a Local Plan.
- 6.1.2 For this reason, this report has been sent to Natural England, Historic England and the Environment Agency with instruction to respond within the five-week consultation period.
- 6.1.3 In addition, the following local organisations have been invited to comment:
- All town and parish councils in the borough
 - Ashford Borough Council
 - Department for Environment, Food and Rural Affairs
 - East Sussex Council Climate Change and Environment Team
 - Forestry Commission
 - High Weald Area of Outstanding Natural Beauty Unit
 - Kent and Medway Biological Records Centre
 - Kent County Council Climate Change and Environment Team
 - Kent County Council Heritage Team
 - Kent County Council Sustainable Urban Drainage Team
 - Kent High Weald Partnership
 - Kent Local Nature Partnership (via self assessment check list)
 - Kent Reptile and Amphibian Group
 - Kent Wildlife Trust
 - Kent Youth Sport
 - Maidstone Borough Council
 - Rother District Council
 - Royal Society for the Protection of Birds
 - Sevenoaks District Council
 - Tonbridge and Malling Borough Council
 - Upper Medway Internal Drainage Board
 - Wealden District Council
 - Woodland Trust
- 6.1.4 Responses from the above bodies are included in Appendix H along with details of how this report has been updated where necessary.

7 Next Steps

- 7.1.1 As explained in paragraph 1.1.2), the SA Scoping Report represents the first stage in the process of assessing how effectively the Local Plan contributes to sustainable development (“Stage A”).
- 7.1.2 The next stage will be to apply the methods set out in this report to the emerging policies for the new Local Plan and to begin to appraise reasonable alternatives (“Stage B”). This is referred to as the Issues and Options Stage of the Local Plan. During this process, consultation will take place again and findings will be fed back to the developers of the new Local Plan so that they can be taken into account when preparing the draft document and considering appropriate options to take forward.
- 7.1.3 Following Issues and Options and when the first draft of the new Local Plan is available, a full appraisal using the methods set out in this report will be completed. Again, findings will be fed back to the developers of the new Local Plan so that they can be taken into account when finalising the first draft.
- 7.1.4 Once finalised, a further consultation process will be completed for the SA Assessment Report alongside the draft new Local Plan, followed by submission for examination. Once adopted, a monitoring programme will begin.

Appendices

Appendix A

Plan, policies and programmes relevant to the sustainability of the Local Plan

Table 8. International Plans, Policies and Programmes

Title	Date	Purpose	Relevance to Local Plan Sustainability
Air Quality Directive	2008	To set objectives and limits for air pollutants	The borough has an AQMA
Birds Directive	2009	To prevent habitat loss and degradation, especially to Special Protection Areas (SPA)	The Ashdown Forest SPA protection buffer is within the borough
Convention for the Protection of the Architectural Heritage of Europe (Granada)	1985	Safeguarding of the cultural heritage of monuments and sites	Borough is rich in cultural heritage which are under threat
Convention on Biodiversity (Nagoya)	2010	Halt the loss of biodiversity	Biodiversity within the borough is under threat
Convention on Climate Change (Paris)	2015	To set out a global action plan to put the world on track to avoid dangerous climate change by limiting global warming to well below 2°C. Comes into force in 2020.	Borough must contribute to carbon reduction
Energy Performance of Buildings Directive	2010	All new building must be nearly zero energy buildings by 2020	Local Plan must support highly energy efficient new buildings
European Convention on the Protection of Archaeological Heritage (Valetta)	1992	To protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study"	Borough is rich in archaeological heritage which are under threat
European Landscape Convention (Florence)	2000	Protection, management and planning of all landscapes and raising awareness of the value of a living landscape	Landscapes within borough are under threat
European Spatial Development Perspective	1999	A policy framework for integrated spatial development	Sustainable development is a holistic approach
Fish Directive	2006	To improve quality of fresh waters for indigenous fish species or those important for water management	The quality of the borough's fresh water needs improvement
Floods Directive	2007	To assess and reduce flood risk	The borough has areas at risk of flooding
Habitats Directive	1992	To conserve habitats in Special Areas of Conservation (SAC)	The Ashdown Forest SAC protection buffer is within the borough
Millennium Ecosystem Assessment	2005	Demonstrated the importance of ecosystem services to human well-being, and also showed that many key services are being degraded and lost at global scales	Biodiversity within the borough is under threat
Nitrates Directive	1991	To protect waters against agricultural pressures	The borough has large areas in agricultural production.

Title	Date	Purpose	Relevance to Local Plan Sustainability
Noise Directive	2001	To assess and manage noise	The borough has areas of high noise levels
Renewable Energy Directive	2001	Sets a target for the UK to source 15% of energy needs from renewable sources by 2020	Borough must contribute to renewable energy generation
Soils Thematic Strategy	2006	Describes importance of protecting soil from degradation and contamination in relation to biodiversity and climate change	Borough must protect soil resources
Urban Waste Water Directive	1991	To protect the environment from waste water discharge	Pollution risks must be controlled in the borough
Waste Framework Directive	2008	To set out waste management hierarchy	Borough must contribute to waste reduction
Water Framework Directive	2000	Cleaner rivers, lakes, groundwater and promotion of sustainable water management and use	Borough's water bodies are under pressure and need improvement

Table 9. National Plans, Policies and Programmes

Title	Date	Purpose	Relevance to Local Plan Sustainability
Air Quality Strategy for England, Scotland and Wales	2011	Set out objectives and policy options	New Local Plan must support objectives and targets for improving air quality
Ancient Monuments and Archaeological Areas Act	1979	To protect the archaeological heritage of Great Britain	Borough is rich in archaeological heritage which is under threat
Biodiversity 2020: A Strategy for England's wildlife and ecosystem services	2011	Provide aims for reducing biodiversity loss, improving networks and guiding development.	New Local Plan should compliment this strategy
BREEAM	Ongoing	To improve environmental standards for buildings via an assessment and scoring process	New Local Plan should promote the use of BREEAM
Climate Change Act	2008	Puts in place a framework to achieve a mandatory 80% cut in the UK's carbon emissions by 2050 (compared to 1990 levels), with an intermediate target of between 26% and 32% by 2020.	Borough must contribute to carbon reduction
Climate Change: The UK Programme	2006	Details approach to meeting targets for the UK	New Local Plan should compliment this programme
Conservation (Natural Habitats) Regulations	2010	Transcribes Habitats Directive into national law.	The Ashdown Forest protection buffer is within the borough

Title	Date	Purpose	Relevance to Local Plan Sustainability
Conservation Area designation, appraisal and management	2016	Details methods and good practice	Conservation should be considered by the SA as a stand alone issue
Countryside and Rights of Way Act	2000	Introduces rights of access for enjoyment of the countryside	New Local Plan should incorporate access policies
Energy Bill	2012-2013	To reduce dependence on fossil fuels and energy demand	New Local Plan must contribute to reduced fossil fuel dependence and energy demand
Energy White Paper	2007	Strategy for meeting for policy goals: (1) cutting the UK's carbon dioxide emissions by some 60% by about 2050, with real progress by 2020; (2) maintaining the reliability of energy supplies; (3) promoting competitive markets in the UK and beyond, helping to raise the rate of sustainable economic growth and to improve productivity; and (4) ensuring that every home is adequately and affordably heated.	Borough must contribute to carbon reduction, sustainable economic growth and affordable heating
Environmental Protection Act (Part 2A)	1990	Sets out statutory regime for contaminated land	New Local Plan should support soil protection and remediation.
Flood and Water Management Act	2010	To ensure comprehensive flood risk management and to make provision for water.	Flood risk areas within the borough must be managed appropriately.
Forestry Policy Statement	2013	Set our priorities to protect, enhance and enlarge woodlands	New Local Plan should support these priorities
Future of Heating: Meeting the Challenge	2013	Information on current situation, preferences for the future and the next steps e.g. networks	New Local Plan should consider these ideas
Guidance on the setting of heritage assets	2011	To define setting and impact on significance	New Local Plan should follow these principles
Historic Environment Good Practice Advice in Planning	2015	Advice for Local Plans and decision taking	New Local Plan should consider this guidance
Local Growth White Paper	2010	Detail the approach for shifting power to local communities and promote strong, sustainable and balanced growth.	New Local Plan should support this goal
Localism Act	2011	Allows Neighbourhood Plans to be developed	New Local Plan must consider locally important issues
Making Space for Water (DEFRA)	2005	To encourage flood risk management as a cross-cutting theme in planning, development, agriculture, transport etc.	New Local Plan should support this goal
National Adaptation Programme	2013	Focus on adapting to the effects of climate changes on cities	New Local Plan should compliment this programme
National Ecosystems Assessment	Ongoing	Value of ecosystems goes beyond intrinsic value. Biodiversity provides goods and services that support our economic and social wellbeing.	Biodiversity within the borough is under threat

Title	Date	Purpose	Relevance to Local Plan Sustainability
National Planning Policy Framework and Guidance	2012	To set out government's planning policies and how they are expected to be applied.	Provides a definition and range of policies for sustainable development.
Natural Environment White Paper	2011	To call for a more integrated landscape-scale approach to protection of wildlife, and linking nature to economy and wellbeing.	Biodiversity within the borough is under threat
Non-statutory technical standards for sustainable drainage systems	2015	Provide guidance on the design, maintenance and operation of SuDS	New Local Plan should support these standards
Planning (Listed Buildings and Conservation Areas) Act	1990	To protect Listed Buildings and Conservation Areas	Borough has many Listed Buildings and Conservation Areas which are under threat
Planning Healthier Places (TCPA)	2013	To encourage Local Plans to allow to health and wellbeing innovations	New Local Plan should support these goals
State of Natural Capital Report	2013	Introduces concept of natural capital and provides recommendations for improving management, calculating valuations and investment challenges	New Local Plan should take note of this approach
Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment	2013	To provide guidance on consideration of the historic environment at stages of the SEA and SA process	SA should follow this advice
Sustainable Communities Act	2010	Grants power to local authorities to develop planning policies that support the objectives of the Act	New Local Plan should incorporate sustainable development policies
Sustainable Communities: Building for the Future	2003	Sustainable communities with focus on lack of housing in the South East and higher quality homes and public spaces	New Local Plan should compliment this strategy
Transport White Paper. Cutting Carbon, creating growth: Making sustainable local transport happen	2011	Describes how local efforts are the best short term method to reduce emissions	New Local Plan must support targets for transport
Transport White Paper. Future of Transport – A Network for 2030	2004	To call for a more coordinated effort between planning and transport policies balancing pressures of social, economic and environment.	New Local Plan must support targets for transport
UK Low Carbon Transition Plan	2009	Details the actions to be taken to cut carbon emissions	New Local Plan must contribute to carbon reduction
UK Sustainable Development Strategy: Securing the Future	2005	Set out sustainable development principles and priority areas for action	New Local Plan should compliment this strategy
Waste Strategy for England	2007	To set targets to ensure better management of waste and resources	New Local Plan should support these targets
Wildlife and Countryside Act	1981	Instils offenses for causing harm to wildlife and details law regarding SSSIs.	New Local Plan must follow this legislation.

Table 10. Regional Plans, Policies and Programmes

Title	Date	Purpose	Relevance to Local Plan Sustainability
Active Lives	2007 - 2016	Advise on adult social services in Kent	New Local Plan should support this vision
Ashdown forest surveys	Ongoing	Visitor, ecology and air quality surveys to assess the current state of this European protected site	New Local Plan should react to the analysis and implications of this survey data
Countryside and Coastal Access Improvement Plan	2013-2017	To improve access for all residents to the countryside and act as a Public Rights of Way Improvement Plan	New Local Plan should take note of countryside access and PRoW advice
Farmsteads Assessment Guidance Supplementary Planning Document	2016	To conserve farmstead character in the borough.	New Local Plan should support this SPD
Growth without Gridlock: Kent Transport Delivery Plan	2010	Identifies priorities and potential revenues sources to deliver priorities.	New Local Plan should recognise and support these priorities
High Weald AONB Management Plan	2014	To conserve and enhance the 5 key components of the character of the AONB	New Local Plan should compliment this plan
Kent 3rd Local Transport Plan	2011 - 2016	A 5 year update of work being carried out towards the 20 year Transport Delivery Plan	New Local Plan should compliment this plan
Kent County Council Local Flood Risk Management Strategy	2013	County-wide strategy to coordinate work, provide solutions and increase understanding	New Local Plan should support this strategy
Kent County Council Drainage and Planning Policy Statement	2015	To encourage sustainable drainage design	New Local Plan should encourage develops to follow this guidance
Kent Design Guide	2006	Guidance and case studies for high quality and sustainable design	New Local Plan should take note of this guide
Kent Environment Strategy	2016	Support Vision for Kent to deliver social, economic and environmental wellbeing	New Local Plan should support this strategy
Kent Joint Health and Wellbeing Strategy	2014 - 2017	Describes how health in the county can be improved and inequalities reduced.	New Local Plan should support this strategy
Kent State of the Environment Report	2015	Evidence base supporting the Kent Environment Strategy	The evidence base for the SA should be consistent with the findings of this report
South East Local Economic Partnership	Ongoing	Explore opportunities and address barriers to enterprise	Local economic issues to be identified and supported by the new Local Plan
South East River Basin Management Plan (EA)	2016	Protect and improve water quality	New Local Plan should compliment this plan
Streets for All: Guidance for practitioners (South East)	2006	Historic England's regional manuals on the design and management of streets and public open spaces	New Local Plan should compliment this guidance

Title	Date	Purpose	Relevance to Local Plan Sustainability
Vision for Kent	2012 - 2016	Set out ambitions of growing the economy, tackling disadvantage and putting the citizen in control.	New Local Plan should support this vision
West Kent Joint Homelessness Strategy	2011 - 2016	Define priorities and monitor progress for reducing homelessness	New Local Plan should support this strategy and its successor which will include the West Kent Housing Strategy

Table 11. Local Plans, Policies and Programmes

Title	Date	Purpose	Relevance to Local Plan Sustainability
Affordable Housing Supplementary Planning Document	2007	Guidance on the requirements of affordable housing	New Local Plan should support and update this document
Air Quality Action Plan	2009	To create and monitor actions for improving air quality	New Local Plan should support this plan
Carbon Management Plan	2010 - 2015	To create and monitor actions for reducing carbon emissions	New Local Plan should support this plan
Climate Local Tunbridge Wells	2014	To mitigate and adapt to climate change at borough scale	New Local Plan should support this ethos
Conservation Area Appraisals Supplementary Planning Document	Schedule updated 2013	To conserve and improve the character and appearance of Conservation Areas in the borough	New Local Plan should follow this guidance
Contaminated Land Strategy 2015-2020	2014	Outlines how TWBC will meet statutory duties relating to contaminated land	New Local plan should support this strategy
Contaminated Land Supplementary Planning Document	2016	Guidance on ensuring developed contaminated land is suitable for use	New Local Plan should support this document
Cycling Strategy (currently under consultation)	2015 - 2020	To identify methods for improving cycling rates in the borough	New Local Plan should support this strategy
Destination Management Plan for Tunbridge Wells	2014 - 2017	To encourage and support tourism	New Local Plan should support this plan
Development Constraints Study	Oct 2016	To identify and confirm key constraints impacting on development in borough.	New Local Plan should be guided by these findings
Ecological networks	TBC (awaiting update)	To map landscape scale initiative e.g. Biodiversity Opportunity Areas	New Local Plan should protect and enhance these features
Economic Needs Study	2016	To establish understanding of factors influencing economic and employment profile of borough and land needs to inform strategy options and allocations	New Local Plan should take note of these findings
Employment Land Review Update	2010	To assess need for employment land	New Local Plan should support the findings of this review

Title	Date	Purpose	Relevance to Local Plan Sustainability
Empty Homes Policy	2012 - 2017	To discourage needlessly empty homes in view of housing shortage	New Local Plan should take note of these findings
Farmsteads Assessment Guidance Supplementary Planning Document	2016	To help secure conservation of farmstead character and sustainable development	New Local Plan should support this document
Green Belt Capacity Review	TBC (awaiting update)	To assess function and purpose of land comprising Green Belt	New Local Plan should take note of these findings
Green Infrastructure Plan Supplementary Planning Document	2014	Sets out vision and framework for existing and future green infrastructure	New Local Plan should support this plan
Gypsy and Traveller Needs Assessment	TBC (awaiting update)	To ensure housing needs for all are considered	New Local Plan should support these findings
Infrastructure Development Plan	TBC (awaiting update)	To assess capacity of settlements to expand	New Local Plan should support these findings
Landscape and Nature Conservation Supplementary Planning Document (Parts 1 - 5)	2002	Guidance notes for planning applications	New Local Plan should support and update where appropriate these findings
Landscape Character Area Assessment and Historic Landscape Characterisation	TBC (awaiting update)	To ensure landscape character and the historic landscape is considered, protected and enhanced	New Local Plan should support these findings
Local Heritage Assets Supplementary Planning Document	2012	To list and protect heritage assets without statutory protection	New Local Plan should recognise these assets
Low and Zero Carbon Opportunity Study for the borough	2009	To determine feasibility of renewable or low energy installations and potential locations within the borough.	New Local Plan should take note of these findings
Neighbourhood Plans	TBC	In progress throughout Borough.	TBC
Noise and Vibration Supplementary Planning Document	2014	To ensure sufficient mitigation to prevent substantial loss of amenity	New Local Plan should take note of this document
Open Space/Recreation Study	TBC (awaiting update)	To identify recreation and open space needs for the borough	New Local Plan should take note of these findings
Paddock Wood Surface Water Management Plan (Stage 1 and 2)	2011 (Stage1) 2015 (Stage 2)	Information on local flood risk and simple solutions	To be referenced by the new Local Plan
Playing Fields/Pitch Strategy (currently under preparation)	2016-2031	TBC	TBC
Recreation Open Space	2006 (with 2013/14 update)	Guidance for development of residential schemes	New Local Plan should support and update these recommendations

Title	Date	Purpose	Relevance to Local Plan Sustainability
Renewable Energy Supplementary Planning Document	2007 (with 2016 update)	Provides guidance on integrating renewable energy into developments	New Local Plan should take note of this document
Retail Study	TBC (awaiting update)	To analyse shopping patterns , retail use in the town centres of the main settlements, advise on and justify a strategy and policy for retail	New Local Plan should take note of these findings
Rural Lanes: Street Furniture, Signs and Materials Practice Note	2004	To help preserve the rich heritage of ancient lanes in the Borough	New Local Plan should take note of the principle in this practice note
Settlement Role and Function Study	TBC (awaiting update)	To inform consideration of retail function of larger settlements and future decisions on development boundaries	New Local Plan should take note of these findings
Sports and Active Recreation Strategy	2016-2021	Raise profile & opportunities for sport, promote healthy lifestyles, and improve facilities.	New Local Plan must support these objectives.
Strategic Flood Risk Assessment	TBC (awaiting update)	Update previous studies with reference to EA's new climate change allowances	New Local Plan should take note of these findings
Strategic Housing and Economic Land Availability Assessment (SHELAA)	TBC (awaiting update)	To inform strategy options and allocations based on needs identified by SHMA and ENS.	New Local Plan should take note of these findings
Strategic Housing Market Assessment (SHMA)	2015	To assess housing needs based on population and household projections	New Local Plan should take note of these findings
Transport Strategy	2015	To address transport issues of the borough	New Local Plan should support this strategy
Tunbridge Wells Borough Site Allocations DPD (submitted for examination in 2015)	2015	To identify suitable development sites in the borough	SA process can be improved upon for new Local Plan
Tunbridge Wells Surface Water Management Plan	2013	Information on local flood risk and simple solutions	To be referenced by the new Local Plan
TWBC Economic Strategy	2012	To ensure a healthy and sustainable local economy	New Local Plan should support these findings
TWBC Landscape Character Area Assessment and Capacity Study	2011	To inform strategy, options and allocations	New Local Plan should take note of these findings
Viability Assessment	TBC (awaiting update)	Staged work to test viability of draft strategy and options, and provide assessment of possible CIL.	Will determine feasibility of sustainability policy options
Wealden Core Strategy (and emerging New local Plan)	2012	A long-term spatial vision and strategic objectives for the Wealden District area	Will allow cumulative impacts to be considered with regard to Ashdown Forest

Appendix B

Social, Economic and Environmental Indicator Data Sources

Table 12. Social baseline indicators sources for Tunbridge Wells Borough.

Indicator	Data Source
16-18 Not in Education, Employment or Training (NEET)	Kent County Council
Access for disabled people	http://www.disabledgo.com/organisations/tunbridge-wells-borough-council/main-2 http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/accessibility-and-wheelchair-housing-standards/
Access to recreation and green open space	Data collection underway. New Recreation and Open Space Study currently being prepared.
Affordable housing	https://www.gov.uk/government/collections/affordable-housing-supply https://www.gov.uk/government/collections/local-authority-housing-data http://www.kent.gov.uk/_data/assets/pdf_file/0003/7356/Affordable-housing-in-Kent.pdf http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0007/98521/SHMA-final-September-2015.pdf
Childhood obesity rates	http://fingertips.phe.org.uk/profile/national-child-measurement-programme
Children in poverty	http://www.kent.gov.uk/_data/assets/pdf_file/0009/7956/Children-in-poverty.pdf
Cycling rates	http://archive.sportengland.org/research/active_people_survey/active_people_survey_7.aspx https://allpartycycling.files.wordpress.com/2013/04/get-britain-cycling1.pdf
Demand for rail services	Tunbridge Wells Transport Strategy 2015
Dwelling, Population and Age Structure Forecasts	http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/population-and-census http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0007/98521/SHMA-final-September-2015.pdf
Excess Winter Mortality	http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tc%3A77-406928
Fear of crime	http://democracy.tunbridgewells.gov.uk/Data/Cabinet/20041021/Agenda/CAB083a.PDF
Health deprivation inequalities	http://www.kpho.org.uk/_data/assets/pdf_file/0019/45505/Inequalities-Tunbridge-Wells.pdf
Health service provision	Data collection underway. A new Infrastructure Development Plan (IDP) is currently being prepared by TWBC.
Homelessness and Temporary accommodation	West Kent Joint Homelessness Strategy 2011-2016 https://www.gov.uk/government/collections/homelessness-statistics http://www.kent.gov.uk/_data/assets/pdf_file/0005/7349/Homelessness.pdf
House price to earnings ratio	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/321017/Table_577.xlsx http://www.kpho.org.uk/_data/assets/pdf_file/0019/45505/Inequalities-Tunbridge-Wells.pdf
Household structure forecasts	http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/population-and-census http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0007/98521/SHMA-final-September-2015.pdf
Indices of multiple deprivation	https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015 http://www.kpho.org.uk/_data/assets/pdf_file/0019/45505/Inequalities-Tunbridge-Wells.pdf
Life expectancy at birth	http://www.kent.gov.uk/_data/assets/pdf_file/0004/13828/Life-expectancy-bulletin.pdf
Limiting long-term illness	http://www.kpho.org.uk/health-and-social-care-maps/pdf-social-care-maps http://www.kpho.org.uk/_data/assets/pdf_file/0010/45838/LTC-Tunbridge-Wells.pdf

Indicator	Data Source
Long Term Vacant Dwellings	http://www.kent.gov.uk/_data/assets/pdf_file/0015/7350/Vacant-and-empty-housing-property.pdf
National Health Indicators	http://www.apho.org.uk/resource/item.aspx?RID=171913
Participation in sport and leisure	http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0015/130074/Sports-Strategy-2016-final.pdf Data collection underway. Pitch Survey Audit currently being prepared.
People who provide unpaid care	http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/equality-and-diversity-data
People with long term disability	http://www.kent.gov.uk/_data/assets/pdf_file/0018/8181/Disability-in-Kent.pdf
Percentage of households in fuel poverty	https://www.gov.uk/government/collections/fuel-poverty-sub-regional-statistics http://www.legislation.gov.uk/ukxi/2014/3220/made
Percentage of people describing their health as good or very good	http://www.kpho.org.uk/_data/assets/pdf_file/0004/45976/Mental-health-Tunbridge-Wells.pdf
Rate and type of crime	http://www.ukcrimestats.com/Subdivisions/DIS/2348/
Rates of physical activity	Kent County Council Public Health Department. Andy Fairhurst.
Selective non-private schools	http://www.kelsi.org.uk/school-management/data-and-reporting/management-information/facts-and-figures http://www.suttontrust.com/researcharchive/poor-grammar-entry-grammar-schools-disadvantaged-pupils-england/
Traffic, Road Safety and Congestion	Tunbridge Wells Transport Strategy 2015
Travel to work	http://www.nomisweb.co.uk/census/2011/dc7101ewla
Wellbeing	http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0016/61540/Green-Infrastructure-Plan-SPD-adopted-August-2014-.pdf https://content.historicengland.org.uk/content/heritage-counts/pub/2016/heritage-and-society-2016.pdf Data collection underway Accessible Natural Greenspace Standards (ANGst) are being mapped for TWB by KCC.

Table 13. Economic baseline indicators sources for Tunbridge Wells Borough.

Evidence	Data Source
3 Year Survival Rates	http://www.kent.gov.uk/_data/assets/pdf_file/0006/8187/Kent-economic-indicators-report.pdf http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0003/134238/Economic-Needs-Study-Final-Report-with-appendices-min2.pdf
Availability of services and facilities	Data collection underway Evidence base update to be completed asap
Broadband connectivity	http://www.kent.gov.uk/_data/assets/pdf_file/0003/11793/About-broadband.pdf
Gross Value Added per capita	http://www.kent.gov.uk/_data/assets/pdf_file/0006/8187/Kent-economic-indicators-report.pdf http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0003/134238/Economic-Needs-Study-Final-Report-with-appendices-min2.pdf
Knowledge Economy	http://www.kent.gov.uk/_data/assets/pdf_file/0004/8194/Redefining-the-knowledge-economy.pdf

Evidence	Data Source
NVQ4+	http://www.kent.gov.uk/_data/assets/pdf_file/0006/8187/Kent-economic-indicators-report.pdf
Resident labour supply	http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/population-and-census
Significant industries	http://www.kent.gov.uk/_data/assets/pdf_file/0017/8180/Business-Register-and-Employment-Survey-BRES.pdf Tunbridge Wells Borough Economic Needs Study (2016)
Tourism	https://www.visitbritain.org/sites/default/files/vb-corporate/Documents-Library/documents/England-documents/260121199_gb_tourist_report_2014_-_17th_sept_2015v2.pdf http://www.visittunbridgewells.com/dbimngs/TW%20Destination%20Management%20Plan%20301013.pdf
Unemployment rate in those aged 16-64	http://www.kent.gov.uk/_data/assets/pdf_file/0006/8187/Kent-economic-indicators-report.pdf http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0003/134238/Economic-Needs-Study_Final-Report-with-appendices-min2.pdf
Weekly Earnings (£)	http://www.kent.gov.uk/_data/assets/pdf_file/0006/8187/Kent-economic-indicators-report.pdf http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0003/134238/Economic-Needs-Study_Final-Report-with-appendices-min2.pdf

Table 14. Environmental baseline indicators sources for Tunbridge Wells Borough.

Evidence	Data Source
Agricultural and woodland productivity	http://www.google.co.uk/url?url=http://publications.naturalengland.org.uk/file/4424325&rct=j&frm=1&q=&esrc=s&sa=U&ved=0ahUKewiwmbL3pobMAhUG2RoKHW6RChUQFggWMAA&sig2=nbfeALKMt7roushjeTBcA&usg=AFQjCNGOp_-FQFmN5v5nYgPQMn0hxh5FOQ Matthew Woodcock, Forest Commission
Air Quality Management Areas	http://www.tunbridgewells.gov.uk/residents/improving-health/air-quality
Area of Outstanding Natural Beauty	http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0018/133137/Development-Constraints-Study_October-2016.compressed.pdf http://www.highweald.org/high-weald-aonb-management-plan.html
Average total energy consumption	DECC Data from 2005 - 2012 https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2010
Biodiversity Opportunity Areas	http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0016/61540/Green-Infrastructure-Plan-SPD-adopted-August-2014-.pdf
Climate change	http://ukclimateprojections.metoffice.gov.uk/ http://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/climate-change/kents-changing-climate
CO ₂ emissions per capita	http://consultations.kent.gov.uk/gf2.ti/f/565026/16253381.1/PDF/-/150723_Kent_State_of_the_Environment_report.pdf http://data.worldbank.org/indicator/EN.ATM.CO2E.PC/countries/GB--XS?display=graph
Construction Waste	http://webarchive.nationalarchives.gov.uk/+http://www.bis.gov.uk/files/file46535.pdf
Consumption of water	http://consultations.kent.gov.uk/consult.ti/KESconsultation/consultationHome
Energy generation	https://www.gov.uk/government/news/changes-to-renewables-subsidies Low Carbon Energy Delivery in Tunbridge Wells. July 2009. Delta. http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/supplementary-planning-documents?root_node_selection%5B19467%5D=19467
Exceedances of air quality targets for nitrogen dioxide and particulate	http://www.kentair.org.uk/data/

Evidence	Data Source
Sites of biodiversity value	http://www.magic.gov.uk/ http://www.tunbridgewells.gov.uk/residents/planning/conservation-and-heritage/natural-conservation-and-wildlife-sites
Sites of geological value	http://www.sssi.naturalengland.org.uk/citation/citation_photo/1002928.pdf
SSSIs in favourable condition	TWBC Annual Monitoring Report (AMR) https://designatedsites.naturalengland.org.uk/
Water body quality	https://www.gov.uk/government/collections/river-basin-management-plans-2015#south-east-river-basin-district-rbmp-2015 https://shareweb.kent.gov.uk/Documents/environment-and-planning/environment-and-climate-change/water%20summit/state-of-water.pdf
Water supply and stress	https://shareweb.kent.gov.uk/Documents/environment-and-planning/environment-and-climate-change/water%20summit/state-of-water.pdf
Wildlife sites of international importance	http://www.ashdownforest.org/home/docs/EXECUTIVESUMMARYPic4web.pdf
Woodland Cover	National Forest Inventory http://www.tunbridgewells.gov.uk/residents/planning/conservation-and-heritage/ancient-woodland-inventory

Appendix C

Social Indicators Analysis

Table 15. Analysis of social baseline indicators and implication for new Local Plan

Indicator	Trend/Key Finding	Target	Implication
16-18 Not in Education, Employment or Training (NEET)	<p>TW 2015 6.19%</p> <p>KENT 6.25%</p> <p>RANK 6th lowest in Kent</p> <p>Number of NEET is close to Kent average and well below target.</p>	TWBC 1.6% Kent 2.5%	Where possible, this issue needs some attention in the new Local Plan.
Access for disabled people	<p>There are 62 identified community places within TWB. Of these:</p> <ul style="list-style-type: none"> • 0% have level access and automatic doors • 58% have access via ramps, slopes or manual doors • 61% cater for mobility impaired walkers • 65% have seats available • 40% have accessible toilets • 48% have standard toilets • 2% have accessible changing rooms • 6% have large print • 2% have braille • 18% have a hearing system • 47% have *** parking standards • 2% have ** parking standards • 11% have * parking standards <p>The SHMA indicates that the growing older population will create a demand for wheelchair accessible homes.</p>	<p>Equality Act (2011) places a duty upon public authorities to consider all individuals when carrying out their day to day work including shaping policy.</p> <p>SHMA indicates 1300 additional specialist homes for older people will be required in the plan period.</p>	<p>Accessible community places are limited in the borough. Improvements must be made to existing places.</p> <p>Adopt a policy that enforces the additional technical housing standard for accessibility and wheelchairs.</p>
Access to recreation and green open space	<p>Data collection underway.</p> <p>Previous data from 2006 noted that TWBC should (1) aim for a “good” standard of parks, informal open space, play areas and natural greenspace rather than “average” standard. Methods to ensure this included:</p> <p>(2) Adopting formal green corridors</p> <p>(3) Improving allotment facilities</p>	TBC	Findings of upcoming Recreation and Open Space Study must be supported in order to promote healthier lifestyles.
Participation in sport and leisure	<p>Key issues for the borough are:</p> <p>(1) Below standard grass playing pitches (especially in winter)</p> <p>(2) More investment in synthetic playing pitches</p> <p>(3) Hawkenbury, Rusthall and Pembury expected to be areas for improvement</p>	Various targets relating to Sports and Recreation Study	New Local Plan should encourage sport and allocate land for sports in appropriate locations.
Affordable housing	<p>Demand 2014-15 1000</p> <p>Supply 141</p> <p>Number of people waiting for social rented housing and number of affordable housing units that were built.</p> <p>Approximately 10 times fewer homes are being delivered than are needed.</p> <p>Latest SHMA (2015) predicts a need of 341 households per year for affordable housing.</p>	Current target is 70 units per year	More affordable homes are urgently required.
Childhood obesity rates	<p>TWB Age 4-5 7.4%</p> <p>South East 8.0%</p> <p>England 9.3%</p>	n/a	The new Local Plan should help support a reduction in

Indicator	Trend/Key Finding	Target	Implication																														
	<p>Age 10-11 15.4% 16.4% 19.1%</p> <p>Obesity rates in TWB children (average for 2010-2015) follow the same trend as in the South East and England, albeit slightly less prevalent.</p> <p>Long term trends are for a rise in childhood obesity in the past 2 decades.</p>		childhood obesity.																														
Children in poverty	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>10%</td> <td>17%</td> <td>20%</td> </tr> </tbody> </table> <p>The borough is within the 20% of districts in the country with the lowest levels of child poverty.</p> <p>TW is the only borough in Kent to have no wards within the 20% of areas in Kent with the highest rates of child poverty.</p> <p>In Kent, TW has had the highest rate of decline in child poverty (-6%) since 2012.</p>		TWB	KCC	ENGLAND	2013	10%	17%	20%	National target set by the Child Poverty Act 2010: 1.7million or fewer children live in poverty by 2020.	<p>Although forecasts predict national targets will be missed, rates of child poverty in the borough are relatively low.</p> <p>This topic is not a priority for the new Local Plan.</p>																						
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Cycling rates	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2012-13</td> <td>16%</td> <td>14.8%</td> <td>14.8%</td> </tr> </tbody> </table> <p>Proportion of residents who have cycled at least once per month. Of these, 12% cycle for at least 30mins once per month and 6% cycle for at least 30mins once per week.</p> <p>Frequent cyclists in TWB are confident and capable of longer journeys. They are also typically white, male, aged between 25-44 and on a higher than average income.</p>		TWB	KCC	ENGLAND	2012-13	16%	14.8%	14.8%	n/a	<p>Frequent cycling is limited to a certain population demographic.</p> <p>The new Local Plan should seek to encourage cycling for all able residents.</p>																						
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Demand for rail services	<p>Between 2002-03 and 2012-13, demand for rail services increased as follows:</p> <table border="1"> <tbody> <tr> <td>Ashurst</td> <td>394% ↑</td> </tr> <tr> <td>High brooms</td> <td>66% ↑</td> </tr> <tr> <td>Paddock Wood</td> <td>6% ↑</td> </tr> <tr> <td>Tunbridge Wells</td> <td>15% ↑</td> </tr> </tbody> </table>	Ashurst	394% ↑	High brooms	66% ↑	Paddock Wood	6% ↑	Tunbridge Wells	15% ↑	n/a	The new Local Plan should prioritise easy access to train stations both in the borough and in neighbouring local authorities.																						
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	<p>increase in the older population.</p> <p>Increase in number of children, lone parents and Black and Ethnic Minority Groups expected in new few years. These groups have a greater reliance on rented accommodation.</p> <p>Self and custom build homes are a potential growth sector in the future.</p>																										
Excess winter mortality	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>NOTES</th> </tr> </thead> <tbody> <tr> <td>2012-13</td> <td>15.6%</td> <td>21.5%</td> <td>4th lowest in Kent</td> </tr> <tr> <td>2011-12</td> <td>25%</td> <td>14.7%</td> <td>2nd highest in Kent</td> </tr> <tr> <td>2010-11</td> <td>23.2%</td> <td>16.7%</td> <td>3rd highest in Kent</td> </tr> <tr> <td>2009-10</td> <td>34.8%</td> <td>18.8%</td> <td>The highest in Kent</td> </tr> <tr> <td>2008-09</td> <td>41.3%</td> <td>28.2%</td> <td>2nd highest in Kent</td> </tr> </tbody> </table> <p>% more deaths in winter compared to rest of year.</p> <p>TWB has had relatively high rates of excess winter mortality.</p>		TWB	KENT	NOTES	2012-13	15.6%	21.5%	4 th lowest in Kent	2011-12	25%	14.7%	2 nd highest in Kent	2010-11	23.2%	16.7%	3 rd highest in Kent	2009-10	34.8%	18.8%	The highest in Kent	2008-09	41.3%	28.2%	2 nd highest in Kent	n/a	<p>Reasons are complicated but a high number of pre 1919 properties in the borough play a part. Listing, solid walls and large windows mean these properties are not well insulated.</p> <p>The Local Plan should seek to rectify this.</p>
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Fear of crime	<p>It is difficult to measure people's perception of fear of crime. However, a draft strategy from 2008 visitor survey has indicated that:</p> <ul style="list-style-type: none"> • 5% of respondents avoid certain areas of the borough (particularly TW town centre) • 15% stated concern over crime affects their daily routine • 80% of residents feel safe walking alone after dark 	n/a	<p>The new Local Plan should seek to reduce fear of crime rates by encouraging good design.</p> <p>This should be a lower priority issue.</p>																								
Health deprivation inequalities	<p>The most deprived areas of the borough for health are located within the following areas:</p> <ul style="list-style-type: none"> • Hawkhurst and Sandhurst • Benenden and Cranbrook • Pembury • Sherwood • Central and north Southborough • High Brooms • Rustall • Broadwater • St James <p>Life expectancy gap from most deprived to least deprived in borough for 2010-2014:</p> <p>♀ 10.1 years ♂ 8.4 years</p> <p>Specific illness gaps (mortality rate per 100,000 population) from most deprived to least deprived for 2012-14:</p> <p>Significant differences in the mortality rates of people living in the most and least deprived areas exist for sufferers of circulatory and respiratory diseases.</p> <p>The highest rates of adult obesity and worse rates of fruit and vegetable consumption are located within the following areas:</p> <ul style="list-style-type: none"> • Sherwood • Southborough and High Brooms 	n/a	<p>There are pockets of health deprivation within the borough around Tunbridge Wells, Hawkhurst and Cranbrook.</p> <p>The new Local Plan should seek to address this imbalance by improving access to exercise and healthy eating and drinking in the vulnerable locations.</p>																								

Indicator	Trend/Key Finding	Target	Implication																														
	<p>In these regions the adult obesity prevalence is between 30-35% and the fruit and vegetable consumption prevalence is between 20-25%.</p> <p>The highest rates of binge drinking are located within the following areas:</p> <ul style="list-style-type: none"> • Sherwood • Southborough and High Brooms • Culverden • St James • Park <p>In these regions the prevalence is more than 20%.</p>																																
Health service provision	<p>Data collection underway.</p> <p>A new Infrastructure Development Plan (IDP) is currently being prepared which will include information on health service provision.</p>	TBC	Support the findings of the upcoming IDP by allocating growth in locations where health-related infrastructure can cope with increased demand.																														
Homelessness and temporary accommodation	<p>In the last 5 years, the number of people accepted as homeless and in priority need in TWB has followed national and regional trends, decreasing to a low point in 2009/2010 and increasing again since this date.</p> <p>Demands for temporary accommodation follow similar trends.</p>	n/a	Trends reflect increasing demand for social rented housing stock. The new local Plan should seek to address this demand.																														
House price to earnings ratio	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>ENGLAND</th> <th>NOTES</th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>9.11</td> <td>7.75</td> <td>6.72</td> <td>2nd highest in Kent</td> </tr> <tr> <td>2012</td> <td>8.63</td> <td>7.61</td> <td>6.86</td> <td>2nd highest in Kent</td> </tr> <tr> <td>2011</td> <td>9.02</td> <td>7.25</td> <td>6.69</td> <td>3rd highest in Kent</td> </tr> <tr> <td>2010</td> <td>9.92</td> <td>7.66</td> <td>7.01</td> <td>Highest in Kent</td> </tr> <tr> <td>2009</td> <td>8.60</td> <td>6.80</td> <td>6.27</td> <td>2nd highest in Kent</td> </tr> </tbody> </table> <p>In the 10 year period between 2009 and 2013, TWB had the 1st, 2nd or 3rd highest house price to earnings ratio in Kent.</p> <p>There are no updates beyond 2013. It is assumed that this trend would continue over the plan period.</p> <p>Average earnings in TWB are the highest in Kent (£650 per week gross) suggesting affordability pressures stem from high house prices rather than low incomes.</p>		TWB	KENT	ENGLAND	NOTES	2013	9.11	7.75	6.72	2 nd highest in Kent	2012	8.63	7.61	6.86	2 nd highest in Kent	2011	9.02	7.25	6.69	3 rd highest in Kent	2010	9.92	7.66	7.01	Highest in Kent	2009	8.60	6.80	6.27	2 nd highest in Kent	n/a	Housing in the borough is expensive. More affordable housing is needed.
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multiple deprivation	<p>within the following areas:</p> <ul style="list-style-type: none"> • Broadwater • Rusthall • St James • St Johns • Sherwood • Southborough and High Brooms <p>This index considers income, employment, education, skills and training, health deprivation and disability, crime, barriers to housing and services, and living environment deprivation.</p>		<p>continue to exist within the borough and are all located within Tunbridge Wells.</p> <p>The new Local Plan should seek to help these locations.</p>																																																																																
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Long term vacant dwellings	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>ENGLAND</th> <th>NOTES</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>0.68%</td> <td>0.69%</td> <td>0.88%</td> <td>5th lowest in Kent</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>ENGLAND</th> <th>NOTES</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>↓ 16%</td> <td>↓ 13%</td> <td>↓ 5%</td> <td>4th lowest in Kent</td> </tr> <tr> <td>2013</td> <td>↓ 7%</td> <td>↓ 20%</td> <td>↓ 15%</td> <td>4th lowest in Kent</td> </tr> <tr> <td>2012</td> <td>↓ 5%</td> <td>↓ 9%</td> <td>↓ 8%</td> <td>6th lowest in Kent</td> </tr> <tr> <td>2011</td> <td>↑ 4%</td> <td>↓ 0.5%</td> <td>↓ 7%</td> <td>4th lowest in Kent</td> </tr> </tbody> </table>		TWB	KENT	ENGLAND	NOTES	2014	0.68%	0.69%	0.88%	5 th lowest in Kent		TWB	KENT	ENGLAND	NOTES	2014	↓ 16%	↓ 13%	↓ 5%	4 th lowest in Kent	2013	↓ 7%	↓ 20%	↓ 15%	4 th lowest in Kent	2012	↓ 5%	↓ 9%	↓ 8%	6 th lowest in Kent	2011	↑ 4%	↓ 0.5%	↓ 7%	4 th lowest in Kent	n/a	<p>Long term vacant dwellings are declining.</p> <p>Not a high priority issue.</p>																																													
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Indicator	Trend/Key Finding	Target	Implication																									
	<p>2010 ↓ 19% ↓ 5% ↓ 5% 5th lowest in Kent</p> <p>Vacant dwellings have generally been declining in the past 5 years (using 2004 baseline).</p> <p>The declines in TWB are similar to the Kent average thus not significantly different from other authorities in Kent.</p>																											
National Health Indicators	<p>32 indicators considered in total. Only 1 worse than the England average:</p> <p>Hospital stays for self-harm. Data standardised for age and sex.</p> <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>England</th> <th>Cases per 100,000</th> </tr> </thead> <tbody> <tr> <td>2013-14</td> <td>263</td> <td>203</td> <td></td> </tr> </tbody> </table>		TWB	England	Cases per 100,000	2013-14	263	203		n/a	Improved mental health support services must be a priority.																	
	TWB	England	Cases per 100,000																									
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People who provide unpaid care	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>9%</td> <td>11%</td> <td>10%</td> </tr> </tbody> </table> <p>In Kent, TW has the lowest proportion of people who provide unpaid care.</p>		TWB	KCC	ENGLAND	2011	9%	11%	10%	n/a	<p>There are relatively few unpaid carers in TW.</p> <p>This is a lower priority for the new Local Plan.</p>																	
	TWB	KCC	ENGLAND																									
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People with long term disability which limits day to day activities	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>14%</td> <td>18%</td> <td>18%</td> </tr> </tbody> </table> <p>In Kent, TW has the lowest proportion of people with a long term disability that limits day to day activities a little and the 3rd lowest with a disability that limits day to day activities a lot.</p>		TWB	KCC	ENGLAND	2011	14%	18%	18%	n/a	<p>Rates of limited disabilities are relatively low in Tunbridge Wells.</p> <p>This should be a lower priority for the new Local Plan.</p>																	
	TWB	KCC	ENGLAND																									
2011	14%	18%	18%																									
Percentage of households in fuel poverty	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>ENGLAND</th> <th>Rank*</th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>9.6%</td> <td>9.6%</td> <td>10.4%</td> <td>6th best</td> </tr> <tr> <td>2012</td> <td>9.2%</td> <td>8.5%</td> <td>10.8%</td> <td>3rd worse</td> </tr> <tr> <td>2011</td> <td>9.4%</td> <td>9.0%</td> <td>11.1%</td> <td>4th worse</td> </tr> <tr> <td>2010</td> <td>13.2%</td> <td>13.1%</td> <td>11.5%</td> <td>5th worse</td> </tr> </tbody> </table> <p>*column shows how TWB is ranked in Kent compared with other districts</p> <p>TWB has an average to high rate of fuel poverty compared with other areas.</p>		TWB	KENT	ENGLAND	Rank*	2013	9.6%	9.6%	10.4%	6 th best	2012	9.2%	8.5%	10.8%	3 rd worse	2011	9.4%	9.0%	11.1%	4 th worse	2010	13.2%	13.1%	11.5%	5 th worse	<p>Fuel Poverty (England) Regulations 2014 state those people who live in fuel poverty must (as far as reasonably applicable) live in a home with a minimum energy efficiency of band C by 2030.</p>	Energy efficiency of new and existing homes should be improved in line with the target specified.
	TWB	KENT	ENGLAND	Rank*																								
2013	9.6%	9.6%	10.4%	6 th best																								
2012	9.2%	8.5%	10.8%	3 rd worse																								
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Percentage of people describing their own health as good or very good	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>85%</td> <td>81.6%</td> <td>81%</td> </tr> </tbody> </table> <p>People describing their health as good or very good is higher in TWB than any other Kent district (census data).</p>		TWB	KENT	ENGLAND	2011	85%	81.6%	81%	n/a	People's opinion of their own health is very high. Thus, improving this aspect is a low priority.																	
	TWB	KENT	ENGLAND																									
2011	85%	81.6%	81%																									
Rate and type of crime	<p>TWB has one of the lowest rates of crime in Kent.</p> <p>Total rates of crime in TWB have not changed significantly in the past 5 years.</p> <p>The 3 most common types of crime in TWB during the last 5 years were anti-social behaviour, violent crime, and criminal damage and arson.</p>	n/a	<p>The new Local Plan should seek to reduce crime rates by encouraging good design.</p> <p>This should be a lower priority issue.</p>																									
Rates of physical activity	<p>Population groups with high rates of physical inactivity in the county are:</p> <p>(1) Residents aged 55 and over on low incomes,</p>	n/a	Physical activity levels in Tunbridge Wells, Southborough, Cranbrook																									

Indicator	Trend/Key Finding	Target	Implication																																
	<p>often living in social housing (2) Residents aged 20-50 on low incomes living in social housing (3) Comfortable off singles and couples aged over 55</p> <p>These groups make up 24% of the county and, in TWB are most highly concentrated in the following locations: (1) Paddock Wood, Cranbrook, Southborough, Tunbridge Wells (2) Southborough (3) Tunbridge Wells</p>		<p>and Paddock Wood require improvement.</p> <p>Vulnerable population groups must be targeted.</p>																																
Selective non-private schools	<table border="1"> <thead> <tr> <th></th> <th>TW</th> <th>KENT</th> <th>RANK in Kent</th> </tr> </thead> <tbody> <tr> <td>Selective</td> <td>44%</td> <td>33%</td> <td>Joint highest with Dartford</td> </tr> </tbody> </table> <p>TW has a higher than average number of selective non private secondary schools which is reflected by higher than average attainment levels in the borough. However, this has implications for social mobility of children from poorer backgrounds.</p>		TW	KENT	RANK in Kent	Selective	44%	33%	Joint highest with Dartford	n/a	If population forecasts are correct and another secondary school is required within the borough during the plan period, a non-selective school should be prioritised.																								
	TW	KENT	RANK in Kent																																
Selective	44%	33%	Joint highest with Dartford																																
Traffic, road safety and congestion	<p>RTW is the borough's primary retail, employment and education centre and peak hour congestion along the key routes is significant. The annual average daily flow of RTW is 90,000 vehicles.</p> <p>Other congested parts of the borough include:</p> <ul style="list-style-type: none"> • A21 (Kiplings Cross to Lamberhurst) • A228 (restricted width sections) • A229 (particularly at Hawkhurst crossroads) • North Farm estate <p>Due to the prevalence of rural roads and busy interurban roads, TWB ranks highly in the county for road crashes.</p> <p>Priority transport projects:</p> <ul style="list-style-type: none"> • Pembury Rd A263 capacity improvements • London Rd/St John's Rd A26 capacity improvements • North Farm infrastructure improvements • RTW town centre public space improvements • Network of key cycling routes • Speed reduction projects in priority locations • Lobby for duelling of A21 (Kiplings Cross to Lamberhurst) • A228 Colts Hill improvements 	n/a	The new local plan should support the 8 priority transport projects identified by the Transport Strategy 2015.																																
Travel to work	<table border="1"> <thead> <tr> <th>(2011 census)</th> <th>TWB</th> <th>SE</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>Train</td> <td>14%</td> <td>7%</td> <td>9%</td> </tr> <tr> <td>Bus</td> <td>2%</td> <td>4%</td> <td>7%</td> </tr> <tr> <td>Car driver</td> <td>50%</td> <td>57%</td> <td>54%</td> </tr> <tr> <td>Car passenger</td> <td>4%</td> <td>5%</td> <td>5%</td> </tr> <tr> <td>Bike</td> <td>1%</td> <td>3%</td> <td>3%</td> </tr> <tr> <td>On foot</td> <td>13%</td> <td>10%</td> <td>10%</td> </tr> <tr> <td>Home working</td> <td>14%</td> <td>12%</td> <td>10%</td> </tr> </tbody> </table> <p>Popular methods of travel to work in TWB are train, car and on foot. Least popular are bus and bike.</p>	(2011 census)	TWB	SE	ENGLAND	Train	14%	7%	9%	Bus	2%	4%	7%	Car driver	50%	57%	54%	Car passenger	4%	5%	5%	Bike	1%	3%	3%	On foot	13%	10%	10%	Home working	14%	12%	10%	n/a	<p>Bus and cycling improvements are necessary to encourage residents away from car travel, particularly in rural areas.</p> <p>Employment should be focused on locations easily accessible by public transport.</p> <p>New development should seek to support home</p>
(2011 census)	TWB	SE	ENGLAND																																
Train	14%	7%	9%																																
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Home working	14%	12%	10%																																

Indicator	Trend/Key Finding	Target	Implication								
	<p>A high proportion of residents work from home.</p> <p>Some rural settlements have no bus service.</p>		working e.g. through fast broadband connections.								
Wellbeing	<p>A growing body of evidence is linking mental and physical wellbeing with access to heritage natural green spaces.</p> <p>Accessible Natural Greenspace Standards (ANGst)</p> <table border="1"> <thead> <tr> <th>Distance to open space</th> <th>Percentage of households</th> </tr> </thead> <tbody> <tr> <td>300m to a 2ha space</td> <td>24%</td> </tr> <tr> <td>2km of 20ha space</td> <td>84%</td> </tr> <tr> <td>5km of 100ha space</td> <td>93%</td> </tr> </tbody> </table> <p>Only 9% of household in the borough meet all standards.</p> <p>3% of households meet none of the standards.</p> <p>Data collection underway Further ANGst mapping is being completed for TWB by KCC.</p> <p>In relation to heritage, 93% of residents agree that local heritage has an impact upon their quality of life (nationwide survey).</p>	Distance to open space	Percentage of households	300m to a 2ha space	24%	2km of 20ha space	84%	5km of 100ha space	93%	<p>Natural England recommends that all households should meet the ANGst.</p> <p>Historic England recommends heritage assets be protected for the sake of personal wellbeing.</p>	<p>The new Local Plan should support provision for and accessibility to natural green spaces.</p> <p>The new Local Plan should support access to heritage assets.</p>
Distance to open space	Percentage of households										
300m to a 2ha space	24%										
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Appendix D

Economic Indicators Analysis

Table 16. Analysis of economic baseline indicators and implication for new Local Plan

Evidence	Trend	Target	Implication																					
3 Year Business Survival Rates	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>60%</td> <td>58%</td> </tr> <tr> <td>2014</td> <td>64%</td> <td>60%</td> </tr> <tr> <td>2013</td> <td>64%</td> <td>61%</td> </tr> <tr> <td>2012</td> <td>65%</td> <td>64%</td> </tr> <tr> <td>2011</td> <td>69%</td> <td>65%</td> </tr> <tr> <td>2010</td> <td>68%</td> <td>63%</td> </tr> </tbody> </table> <p>The proportion of new businesses which remain surviving after 3 years trading in TWB has followed a similar trend to KCC (declining over the past 5 years) but is generally higher in TWB than the KCC average.</p> <p>There were a high number of start-up businesses in Tunbridge Wells in 2013-2014.</p>		TWB	KCC	2015	60%	58%	2014	64%	60%	2013	64%	61%	2012	65%	64%	2011	69%	65%	2010	68%	63%	n/a	Support for new business must be provided by the new Local Plan.
	TWB	KCC																						
2015	60%	58%																						
2014	64%	60%																						
2013	64%	61%																						
2012	65%	64%																						
2011	69%	65%																						
2010	68%	63%																						
Availability of services and facilities	<p>Services and facilities lacking in some rural settlements.</p> <p>Economic and retail floor space being lost to housing.</p> <p>Data collection underway Evidence base update to be completed asap</p>	TBC	Housing growth should be focussed only in locations with suitable services and facilities.																					
Broadband connectivity	BDUK is seeking to ensure that at least 95% of properties across the UK can access superfast broadband by the end of 2017.	n/a	The new Local Plan should seek to ensure the 'final 5% areas' also have superfast broadband.																					
Gross Value Added per capita	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>£21,688</td> <td>£19,835</td> </tr> <tr> <td>2014</td> <td>£20,017</td> <td>£17,909</td> </tr> <tr> <td>2013</td> <td>£19,646</td> <td>£17,926</td> </tr> <tr> <td>2012</td> <td>£19,254</td> <td>£17,667</td> </tr> <tr> <td>2011</td> <td>£18,293</td> <td>£16,963</td> </tr> <tr> <td>2010</td> <td>£19,301</td> <td>£17,764</td> </tr> </tbody> </table> <p>Residents of TWB contribute more to the economy than the average for KCC.</p> <p>The Information, communication and professional sectors has contributed the most to this trend.</p>		TWB	KCC	2015	£21,688	£19,835	2014	£20,017	£17,909	2013	£19,646	£17,926	2012	£19,254	£17,667	2011	£18,293	£16,963	2010	£19,301	£17,764	n/a	The population of TWB is generally prosperous.
	TWB	KCC																						
2015	£21,688	£19,835																						
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2010	£19,301	£17,764																						
Knowledge Economy (a key driver for economic growth)	<p>TWB has the highest proportion of employees whose main purpose centres of knowledge or information in KCC (32%).</p> <p>TWB has also seen the biggest growth in the knowledge economy with 8,200 more employees over the last 4 years (+77%) largely from the financial services sector Industries that fall in this category are likely to have high dependency on technology and provide highly skilled and technical jobs.</p>		The growth and importance of the knowledge economy in the borough is significant and must be maintained by the new Local Plan through attractions for employers such as fast broadband speeds and suitable premises.																					
NVQ4 or higher	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>40%</td> <td>32%</td> </tr> </tbody> </table>		TWB	KCC	2015	40%	32%	n/a	The local plan should ensure that residents															
	TWB	KCC																						
2015	40%	32%																						

Evidence	Trend	Target	Implication																					
	<table border="1"> <tr> <td>2014</td> <td>42%</td> <td>34%</td> </tr> <tr> <td>2013</td> <td>41%</td> <td>30%</td> </tr> <tr> <td>2012</td> <td>35%</td> <td>30%</td> </tr> <tr> <td>2011</td> <td>41%</td> <td>29%</td> </tr> <tr> <td>2010</td> <td>33%</td> <td>25%</td> </tr> </table> <p>The number of residents in TWB borough that are qualified to degree level or equivalent or above, fluctuates from year to year but has been generally increasing at a similar rate to the KCC average. The higher than average qualifications of TWB residents compared to KCC will contribute to the local economy.</p> <p>The workforce contains a greater proportion of people with lower level qualifications.</p>	2014	42%	34%	2013	41%	30%	2012	35%	30%	2011	41%	29%	2010	33%	25%		continue to gain a high level of qualification through supporting education services.						
2014	42%	34%																						
2013	41%	30%																						
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Resident labour supply (2015 - 2031)	Taking into account births, deaths, natural change and net migration, the TWB resident labour supply will increase by 0.8% over the plan period.	n/a	Insignificant change.																					
Significant Industries	<p>The biggest growth industries in TWB in 2014 were:</p> <ul style="list-style-type: none"> • Financial and insurance • Professional, scientific and technical • Administrative and support services <p>The biggest industries as a whole in TWB in 2014 were:</p> <ul style="list-style-type: none"> • Wholesale and retail trade • Human health and social work • Financial and insurance <p>The smallest industries in TWB in 2014 were:</p> <ul style="list-style-type: none"> • Arts, recreation and entertainment • Public administration and defence • Real estate activities <p>The latest Economic Growth Study (2016) suggests professional and financial services, health and education and construction related activities are the biggest growth industries in the Borough.</p>	n/a	The new Local Plan should support industries that contribute most highly to the local economy.																					
Tourism	<p>Average for 2012-2014</p> <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC Rank</th> </tr> </thead> <tbody> <tr> <td>Num. of Trips</td> <td>0.15</td> <td>2nd lowest</td> </tr> <tr> <td>Overnight stays</td> <td>0.38</td> <td>3rd lowest</td> </tr> <tr> <td>Spend (£) (millions)</td> <td>13</td> <td>2nd lowest</td> </tr> </tbody> </table> <p>TWB attracts relatively few tourists compared to other Kent districts.</p> <p>Neighbouring districts of Wealden and Rother also attract at least double the spend and near double the number of nights stay as TWB.</p>		TWB	KCC Rank	Num. of Trips	0.15	2 nd lowest	Overnight stays	0.38	3 rd lowest	Spend (£) (millions)	13	2 nd lowest	TWB to be widely recognised as ideal short break destination by 2020 (TW Destination Management Plan).	<p>Tourism is a less important in TWB compared with other districts in the region.</p> <p>The new Local Plan should attempt to strengthen this part of the local economy.</p>									
	TWB	KCC Rank																						
Num. of Trips	0.15	2 nd lowest																						
Overnight stays	0.38	3 rd lowest																						
Spend (£) (millions)	13	2 nd lowest																						
Unemployment rate in those aged 16-64	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>0.9%</td> <td>2.0%</td> </tr> <tr> <td>2014</td> <td>1.2%</td> <td>2.8%</td> </tr> <tr> <td>2013</td> <td>1.5%</td> <td>3.2%</td> </tr> <tr> <td>2012</td> <td>1.7%</td> <td>3.1%</td> </tr> <tr> <td>2011</td> <td>1.8%</td> <td>3.0%</td> </tr> <tr> <td>2010</td> <td>2.0%</td> <td>3.1%</td> </tr> </tbody> </table> <p>The highest numbers of unemployed in TWB are located in</p>		TWB	KCC	2015	0.9%	2.0%	2014	1.2%	2.8%	2013	1.5%	3.2%	2012	1.7%	3.1%	2011	1.8%	3.0%	2010	2.0%	3.1%	n/a	<p>Unemployment rates are relatively low.</p> <p>Trends reveal locations with the highest and lowest rates.</p> <p>Job availability, access</p>
	TWB	KCC																						
2015	0.9%	2.0%																						
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Evidence	Trend	Target	Implication																																								
	<p>the wards of St James', Broadwater Down, Paddock Wood East, Southborough & High Brooms, and Sherwood.</p> <p>The lowest numbers are in Frittenden & Sissinghurst, Pantiles & St Marks, Park and Speldhurst & Bidborough.</p>		<p>to jobs and developing the skills required impact upon these trends.</p>																																								
<p>Weekly Earnings</p>	<table border="1"> <thead> <tr> <th></th> <th colspan="2">TWB</th> <th colspan="2">KCC</th> </tr> <tr> <th></th> <th>Workplace</th> <th>Resident</th> <th>Workplace</th> <th>Resident</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>£521</td> <td>£646</td> <td>£490</td> <td>£542</td> </tr> <tr> <td>2014</td> <td>£526</td> <td>£646</td> <td>£482</td> <td>£541</td> </tr> <tr> <td>2013</td> <td>£555</td> <td>£613</td> <td>£491</td> <td>£539</td> </tr> <tr> <td>2012</td> <td>£489</td> <td>£613</td> <td>£489</td> <td>£547</td> </tr> <tr> <td>2011</td> <td>£483</td> <td>£592</td> <td>£488</td> <td>£530</td> </tr> <tr> <td>2010</td> <td>£464</td> <td>£574</td> <td>£479</td> <td>£518</td> </tr> </tbody> </table> <p>TWB workplace earnings have followed the same trend as the KCC average; rising slowly in the last 5 years and dropping in 2014.</p> <p>Resident earnings did not experience this decline and reflect the easy commute to London where salaries are higher and less affected by national trends.</p>		TWB		KCC			Workplace	Resident	Workplace	Resident	2015	£521	£646	£490	£542	2014	£526	£646	£482	£541	2013	£555	£613	£491	£539	2012	£489	£613	£489	£547	2011	£483	£592	£488	£530	2010	£464	£574	£479	£518	<p>n/a</p>	<p>The draw of London for higher paid work should be recognised by the new Local Plan in terms of suitable commuting locations and a good transport network.</p> <p>Local, well paid employment opportunities should also be created.</p>
	TWB		KCC																																								
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Appendix E

Environmental Indicators Analysis

Table 17. Analysis of environmental baseline indicators and implication for new Local Plan

Evidence	Data and Trend	Target	Implication																				
Agricultural and woodland productivity	<p>TWB has large areas of good quality agricultural land.</p> <p>There are pockets of land graded as 3 or better in the centre of the borough and around Paddock Wood. However, more detailed analysis at local level throughout the borough would be required to accurately determine quality.</p> <p>No data on woodland productivity but if 2/3rds of existing woodland in TWB was actively managed (i.e. their increment harvested) this would equate to at least: 23,000m³ per year.</p> <p>Of this, 6,000m³ would be saw logs – which could be used locally, and > 17,000 m³ of lower quality wood which could be used as a sustainable and low carbon fuel source – having an energy value of 35,000MWh (equivalent to 3,500,000 litres of heating oil per year).</p>	n/a	The new Local Plan should support continued development of housing on poor grade agricultural land in preference to best and most versatile.																				
Air Quality Management Areas	<p>Two roads in Tunbridge Wells:</p> <ul style="list-style-type: none"> • A26 beginning at junction with Park Rd (Southborough) and finishing at the roundabout with Nevill Terrace. • Grosvenor Rd <p>An improvement in baseline air quality may be seen as vehicle emissions are improved with advances in technology, Euro 6 standards and transition to electric vehicles. This improvement rate is often described as 2%pa for the first half of the plan period so will not create a significant long term change.</p>	n/a	Development in this region (and any other areas with poor air quality) must not contribute to poor air quality or put sensitive receptors at risk. The new Local Plan should seek to improve air quality in these locations.																				
Aircraft/rail Noise	<p>The Gatwick airport flight path falls within the west of TWB.</p> <p>The area west of TW has over 35 flights per day with flights per day falling from 35 to 10 as you travel west to east across the town.</p> <p>The rest of the borough has between 1 and 10 flights per day.</p> <p>There are two train lines and 3 train stations in the borough. Noise from these sources needs consideration.</p>	n/a	Development within the areas of high flight numbers or railway noise should avoided particularly residential developments or those for sensitive receptors.																				
Area of Outstanding Natural Beauty	<p>The High Weald AONB washes over 70% of the borough.</p> <p>In 2013, the condition was assessed as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Number of sub elements</th> </tr> </thead> <tbody> <tr> <td>Poor and under threat</td> <td>4</td> </tr> <tr> <td>Poor and vulnerable</td> <td>2</td> </tr> <tr> <td colspan="2">-----</td> </tr> <tr> <td>Average but under threat</td> <td>2</td> </tr> <tr> <td>Average but vulnerable</td> <td>2</td> </tr> <tr> <td>Average and stable</td> <td>2</td> </tr> <tr> <td colspan="2">-----</td> </tr> <tr> <td>Good but under threat</td> <td>4</td> </tr> <tr> <td>Good and stable</td> <td>1</td> </tr> </tbody> </table>		Number of sub elements	Poor and under threat	4	Poor and vulnerable	2	-----		Average but under threat	2	Average but vulnerable	2	Average and stable	2	-----		Good but under threat	4	Good and stable	1	n/a	The new Local Plan must protect and enhance this area.
	Number of sub elements																						
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Evidence	Data and Trend	Target	Implication																																								
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Biodiversity Opportunity Areas	There are 3 BOAs within the borough: (1) High Weald (2) Medway and Low Weald grassland and Wetland (3) Romney Marshes	Numerous	The targets for the BOAs should be supported by the new Local Plan.																																								
Climate change	<p>Kent's geographical location and population density mean that it is likely to suffer from some of the severest impacts of climate change in the UK.</p> <p>Key changes are below. By 2050:</p> <ul style="list-style-type: none"> • Winters will be 2°C warmer on average • Summers will be 3°C warmer on average • Extreme summer days will be 4°C warmer • Winter rainfall will increase by 16% • Summer rainfall will decrease by 19% • Increased frequency of severe weather events <p>These changes will have far-reaching impacts including:</p> <ul style="list-style-type: none"> • Changes in species distribution, including invasive species, pests and disease • Water shortages in summer months • Heat exhaustion in vulnerable people • Increased flooding events • Transport route disruption 	n/a	The new Local Plan must make provision for adaptation to the impacts of climate change.																																								
CO ₂ emissions per capita	<table border="1"> <thead> <tr> <th></th> <th>Industry/ Commercial</th> <th>Transport</th> <th>Domestic</th> <th>Total TWB (UK)</th> </tr> </thead> <tbody> <tr> <td>2012</td> <td>2.5</td> <td>2.2</td> <td>2.2</td> <td>6.9</td> </tr> <tr> <td>2011</td> <td>2.8</td> <td>2.2</td> <td>2.0</td> <td>7.0 (7.1)</td> </tr> <tr> <td>2010</td> <td>3.0</td> <td>2.2</td> <td>2.2</td> <td>7.4 (7.8)</td> </tr> <tr> <td>2009</td> <td>2.7</td> <td>2.3</td> <td>2.1</td> <td>7.0 (7.6)</td> </tr> <tr> <td>2008</td> <td>3.5</td> <td>2.4</td> <td>2.2</td> <td>8.1 (8.4)</td> </tr> </tbody> </table> <p>Data calculated as proportion of Kent population</p>		Industry/ Commercial	Transport	Domestic	Total TWB (UK)	2012	2.5	2.2	2.2	6.9	2011	2.8	2.2	2.0	7.0 (7.1)	2010	3.0	2.2	2.2	7.4 (7.8)	2009	2.7	2.3	2.1	7.0 (7.6)	2008	3.5	2.4	2.2	8.1 (8.4)	Kent objective: 2.6% reduction per year	Reduction target has not been achieved in all years (especially associated with transport). The new Local Plan must support further work in carbon reduction.										
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2008	3.5	2.4	2.2	8.1 (8.4)																																							
Construction materials	<p>Materials are the biggest contributor to a development sites carbon footprint.</p> <p>The removal of the Code for Sustainable Homes and ability of local Authorities to require a developer meet high environmental standards, means a developer's choice of materials may be less stringent.</p> <p>Developers should aim to source materials locally and responsibly, and should choose materials with a low embodied energy and high recycled content. This data is often not captured thoroughly by Construction Environmental Management Plans.</p>	Materials used in construction to have the least environmental and social impact feasible (Government's Sustainable Construction Strategy)	With a high number of construction sites for housing developments expected in the plan period, the new Local Plan must help meet target for responsible sourcing of materials with a low environmental impact.																																								
Construction waste	The construction industry is responsible for 24% of all waste in the UK. 19% of this is from materials that are delivered and unused, and 12% of this waste is sent straight to landfill.	Zero construction waste to landfill by 2020 (Government's Sustainable Construction Strategy)	With a high number of construction sites for housing developments expected in the plan period, the new Local Plan must help meet target for reducing construction waste to																																								

Evidence	Data and Trend	Target	Implication																																										
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Consumption of water	SEW supply whole borough. <table border="1"> <thead> <tr> <th>TWB</th> <th>KENT</th> <th>ENG & WALES</th> </tr> </thead> <tbody> <tr> <td>158</td> <td>154</td> <td>141</td> </tr> </tbody> </table> litres/household/day 2013-14 data.	TWB	KENT	ENG & WALES	158	154	141	Reduce consumption to 140litres per person per day by 2016 (KES).	TWB consumption rates are higher than the national average and must be reduced.																																				
TWB	KENT	ENG & WALES																																											
158	154	141																																											
Demolition and rebuild	In recent years, DM officers have observed an increase in the number of planning applications for demolition and rebuild of existing good quality dwellings.	n/a	This is an unsustainable use of resources and should be discouraged by the new Local Plan.																																										
Energy generation	Removal of government subsidies may bring about a decline in the renewable energy industry. Good opportunities exist in the borough for developing a large biomass industry especially following the recent opening of the Discovery Park biomass burner in east Kent. Community heating schemes provide benefits for energy conservation, fuel poverty and social regeneration. Government subsidies are becoming increasingly available and more and more councils are gaining experience in installing heat networks. This opportunity has not yet been exploited in the borough.	10% of energy generated by a new development to be generated by renewable energy sources Note: target subject to change.	The new Local Plan should support renewable and community energy wherever possible.																																										
Exceedances of air quality targets for nitrogen dioxide and particulate matter	<table border="1"> <thead> <tr> <th>NO₂</th> <th>Hourly >200µg/m³</th> <th>Annual >40µg/m³</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>0</td> <td>44</td> </tr> <tr> <td>2014</td> <td>0</td> <td>48</td> </tr> <tr> <td>2013</td> <td>0</td> <td>47</td> </tr> <tr> <td>2012</td> <td>0</td> <td>48</td> </tr> <tr> <td>2011</td> <td>0</td> <td>43</td> </tr> <tr> <td>Target</td> <td>18</td> <td>40</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>PM₁₀</th> <th>Daily >50µg/m³</th> <th>Annual >40µg/m³</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>12</td> <td>28</td> </tr> <tr> <td>2014</td> <td>11</td> <td>28</td> </tr> <tr> <td>2013</td> <td>8</td> <td>28</td> </tr> <tr> <td>2012</td> <td>15</td> <td>28</td> </tr> <tr> <td>2011</td> <td>10</td> <td>30</td> </tr> <tr> <td>Target</td> <td>35</td> <td>40</td> </tr> </tbody> </table> (monitoring station roadside A26)	NO ₂	Hourly >200µg/m ³	Annual >40µg/m ³	2015	0	44	2014	0	48	2013	0	47	2012	0	48	2011	0	43	Target	18	40	PM ₁₀	Daily >50µg/m ³	Annual >40µg/m ³	2015	12	28	2014	11	28	2013	8	28	2012	15	28	2011	10	30	Target	35	40	Air Quality Directive, 2008 NO ₂ : Not to exceed 200µg/m ³ more than 18 times per year and annual mean of 40µg/m ³ Particulates: Not to exceed 50µg/m ³ more than 35 times per year and annual mean of 40µg/m ³	European NO ₂ targets are not being met. The Local Plan must support traffic reduction in Tunbridge Wells.
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Features of historical value	Within TWB there are: 14 Registered Parks and Gardens (with special historic interest) and a further 30 recognised by KCC 25 Conservation Areas 2,985 Listed Buildings (including 1 building at risk: Providence Chapel, Cranbrook) 11 Scheduled Ancient Monuments The borough is also rich in numerous other heritage assets e.g. monuments, sites of archaeological potential and historic routeways. Data collection underway. Baseline data collection is underway in 2016/17 and a strategy to address assets currently, and with potential for, being at risk will be prepared subsequently.	TBC	The new Local Plan must protect and/or enhance these features.																																										
Green Belt	7,130 ha of TWB are classified as Green Belt. This is 22% of	n/a	The new Local Plan																																										

Evidence	Data and Trend	Target	Implication																					
	<p>the area of the borough.</p> <p>The key purpose of this Green Belt land is to prevent encroachment (i.e. purpose 3 of paragraph 80 in the NPPF).</p> <p>Data collection underway. A Stage 1 and 2 Green Belt study is underway.</p>		should seek to protect land that makes a strong contribution to the 5 purposes of Green Belt land (see NPPF).																					
Green Infrastructure and trees	<p>Green Infrastructure in the borough needs strengthening.</p> <p>Priority projects are:</p> <ul style="list-style-type: none"> • Applications for new development • Forest Ridge Project • High/Low Weald links • Teise to Medway river links • Romney Marsh Biodiversity Opportunity Area extension • Tourist attraction links • High Weald transition zone • Redundant railways • Surface water management <p>Data collection underway Tunbridge Wells urban tree canopy cover study by Forestry Commission is underway (expected Spring 2017).</p>	n/a	The new Local Plan must support the priority Green Infrastructure projects.																					
Groundwater recharge	<p>Land in TWB has a groundwater recharge rate of 300-350mm per annum</p> <p>This is the second highest rate in Kent.</p> <p>The lowest rates are seen in the north of the county at 150-199mm per annum.</p> <p>Recharge rates vary according to land management, soil type and underlying geology.</p>	n/a	<p>Recharge rates are relatively fast for the region.</p> <p>The Local Plan does not need to promote land management practices that encourage faster recharge.</p>																					
Historic Farmsteads	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> </tr> </thead> <tbody> <tr> <td>Minimal change</td> <td>16%</td> <td>10%</td> </tr> <tr> <td>More than 50% retention</td> <td>46%</td> <td>36%</td> </tr> <tr> <td>Less than 50% retention</td> <td>22%</td> <td>25%</td> </tr> <tr> <td>Farmhouse only</td> <td>10%</td> <td>16%</td> </tr> <tr> <td>Completely lost</td> <td>5%</td> <td>12%</td> </tr> <tr> <td>% Survival</td> <td>84%</td> <td>71%</td> </tr> </tbody> </table> <p>There are 700 farmsteads and 86 out farms or field barns within the borough. Survival rates are higher than the Kent average.</p>		TWB	KENT	Minimal change	16%	10%	More than 50% retention	46%	36%	Less than 50% retention	22%	25%	Farmhouse only	10%	16%	Completely lost	5%	12%	% Survival	84%	71%	n/a	The new Local Plan should seek to protect historic farmsteads.
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	2014/15 - 47%	2009/10 - 45%																						
	2013/14 - 46%	2008/09 - 47%																						

Evidence	Data and Trend	Target	Implication
diverted from landfill	2012/13 - 46% 2007/08 - 46% 2011/12 - 46% 2006/07 - 43% 2010/11 - 46% 2005/06 - 37% TWB has not seen any significant improvement since 2006/07.	50% of household waste by 2020/21 (Climate Local Tunbridge Wells) 50% recycling rate by 2020 and 65% by 2030 (EU)	Achieving the final 3% may be difficult. More work required.
Landscape Character and Quality (historic and existing)	There are 19 Landscape Character Areas in the borough and other valuable landscapes including Important Landscape Approaches, Areas of Landscape Importance, Arcadian Areas and Areas of Important Open Space. The historic landscape is under threat from development. Data collection underway. Evidence base update to be completed asap.	TBC	The new Local Plan must help protect the character of the existing and historic landscape.
Light pollution	Some of the best dark skies in the South East are south of Tunbridge Wells (outside of the Borough).	n/a	The new Local Plan should seek to protect dark skies.
New homes built on previously developed land	2013-2015 41-60% of new addresses were created on previously developed land. This proportion is relatively high compared to neighbouring authorities with all neighbouring authorities building 40% or less except Sevenoaks District which is equal to TWB.	n/a	The new Local Plan should support continued development of housing on brownfield land in preference to greenfield.
Number of car club vehicles for hire	6 in Tunbridge Wells	n/a	Local Plan policies should support the expansion of the car club throughout the borough.
Number of electric vehicle charge points	4 charge points: <ul style="list-style-type: none"> • 2 in The Great Hall car park • 2 in Crescent Road car park 	n/a	Local Plan policies should support the installations throughout the borough along with other low emission technologies.
Premature deaths from poor air	In 2010, there were 67 premature deaths (per 100,000) as a direct result of the air pollutant PM _{2.5} . TWB is the 8 th worst district in Kent. Calculations for other pollutants are not available.	n/a	Poor air quality in the borough is shortening people's lives. The Local Plan must support traffic reduction in Tunbridge Wells.
Priority B lines	Routes for pollinators have been mapped in Kent and Sussex. A key B Line travels through the borough from Maidstone, southwards into the borough and forks into two lines near Goudhurst; one of which travels southeast towards Rolvenden, the other southwest towards Wadhurst. These particular B Lines are also described as being areas where adding new habitat would have the greatest impact on flow from source to target.	n/a	To address pollinator declines, the new Local Plan must assist with creation of wildflower rich grassland in the location of identified B lines.
Properties at	Flood Zone 2: 1,374 properties	n/a	The new Local Plan

Evidence	Data and Trend	Target	Implication												
risk from flooding	<p>Flood Zone 3: 1,283 properties (2007 data)</p> <p>Most flood risk is from rivers in the catchments of the Rivers Medway, Teise, Beult and Rother. There are also areas at risk from flooding relating to stormwater and groundwater.</p> <p>Data collection underway. Evidence base update to be completed asap.</p>		must ensure existing properties are not put at further risk of flooding and that risk is reduced wherever possible.												
Road Noise	<p>DEFRA Important Areas for road noise:</p> <p>A21 – 16 sections A228 – 5 sections A264 – 4 sections A26 – 7 sections</p>	n/a	Development adjacent to these sections of road should be avoided, particularly residential developments or those for sensitive receptors.												
Sites of biodiversity value	<p>Within TWB there are:</p> <p>4 Local Nature Reserves 59 Local Wildlife Sites* 17 Sites of Local Nature Conservation value 12 Roadside Nature Reserves</p> <p>* 47% in positive management in 2015/16</p>	60% of LWs to be in positive management for their conservation by 2020 (Kent Environment Strategy)	The new Local Plan must protect and/or enhance all site of ecological value												
Sites of geological value	<p>Within TWB there are:</p> <p>1 Regionally Important Geological Site</p>	n/a	The new Local Plan must protect and/or enhance this site of geological value												
SSSIs units in favourable or recovering condition	<p>TWB 2015 - 75% 2016 – 79%</p> <p>KENT & SOUTH EAST 2015 - 97%</p> <p>ENGLAND 2015 - 96%</p> <p>There are 10 SSSIs in TWB. Data is collected by Natural England.</p>	95% (England Biodiversity 2020)	<p>TWB lags behind.</p> <p>Where possible, new Local Plan must support work to improve condition of SSSIs (Natural England is overseeing body).</p>												
Water body quality	<p>% of water bodies in the South East (excluding estuaries and coastal) with good or better status for:</p> <p>Ecology – 21% Chemical – 99% Groundwater – 52%</p> <p>The most common pressures and the associated sources for not achieving a good status are:</p> <table border="0"> <tr> <td>Pressure</td> <td>Key Sources</td> <td></td> </tr> <tr> <td>Phosphate</td> <td>Water industry</td> <td>Agriculture and rural land</td> </tr> <tr> <td></td> <td>management</td> <td></td> </tr> <tr> <td>Physical modification</td> <td>Local & central government</td> <td>Agriculture and rural land management</td> </tr> </table>	Pressure	Key Sources		Phosphate	Water industry	Agriculture and rural land		management		Physical modification	Local & central government	Agriculture and rural land management	Various to be achieved by 2021	The new Local Plan must protect and enhance water bodies that are within or connected to TWB.
Pressure	Key Sources														
Phosphate	Water industry	Agriculture and rural land													
	management														
Physical modification	Local & central government	Agriculture and rural land management													

Evidence	Data and Trend	Target	Implication
	<p>Dissolved oxygen</p> <p>Water industry Agriculture and rural land management</p> <p>Ground water quality status in TWB is defined as failing.</p>		
Water supply and stress	<p>73% of drinking water supply in Kent is taken from groundwater. This is by far the highest proportion in the UK (next highest proportion in the UK is 50% by Wessex Water).</p> <p>Abstraction pressure in Kent is highest on the River Medway and the greatest ecological pressure is in the north Kent Rivers. No water is available for abstraction in TWB so there is no abstraction pressure.</p> <p>Water transfers take place from Bewl Water reservoir to the south of TWB and Maidstone Borough to the north.</p> <p>According to 2013 classifications, South East Water is defined as being an area of serious water stress both currently and in all future modelled scenarios.</p>	n/a	<p>TWB is in an area of serious water stress.</p> <p>Adopt a policy that enforces the additional technical housing standard for water.</p>
Wildlife sites of international importance	<p>The Ashdown Forest SAC and SPA are approximately 7km south west of the Borough.</p> <p>20% of the total area is in favourable condition.</p> <p>10% of the heathland area is in favourable condition.</p>	Conservation Management Plan contains various targets to improve condition.	The new Local Plan must protect and/or enhance this site following guidance from up to date Habitat Regulations Assessment.
Woodland Cover	<p>5391 ha of TWB is classified as Ancient Woodland. This is 16% of the area of the borough.</p> <p>TWB has 7215ha of woodland in total. This is 21.8% of the area of the borough.</p>	n/a	The new Local Plan must protect this area.

Appendix F

Sustainability Objectives

Table 18. Sustainability Objectives for Tunbridge Wells Borough

Topic	Objective	Recommendations for the new Local Plan.
1. Air	Reduce air pollution	<ul style="list-style-type: none"> • Meet NO₂ targets along the A26 in Royal Tunbridge Wells • Support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options • Promote other forms of active travel including cycling and walking • Reduce premature deaths from poor air quality
2. Biodiversity	Protect and enhance biodiversity and the natural environment	<ul style="list-style-type: none"> • Protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA) • Avoid inappropriate development in the Ashdown Forest 7km protection zone and ensure compliance with the Habitat Regulations. Any development proposed for the Ashdown Forest 7km zone of influence must provide the necessary mitigation measures to avoid impact • Support work to improve condition of SSSIs • Support work to create habitat and restore and expand priority habitats to reduce fragmentation and promote ecological networks • Ensure current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced
3. Business Growth	Encourage business growth and competitiveness	<ul style="list-style-type: none"> • Help address declining new business survival rates • Support growth of the local economy from professional and financial, health and education, and construction-related industries • Support the Knowledge Economy • Prevent loss of economic floor space in preference for housing (where appropriate) • Recognise and help develop the rural economy
4. Climate Change & Energy	Reduce carbon footprint and adapt to predicted changes	<ul style="list-style-type: none"> • Relieve pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures • Support reduction in carbon and energy so targets are consistently met • Support opportunities to utilise biomass in the borough • Support opportunities to install community heating schemes
5. Deprivation	Reduce poverty and assist with regeneration	<ul style="list-style-type: none"> • Address pockets of deprivation and encourage regeneration • Reduce rates of fuel poverty
6. Education	Improve educational attainment and enhance the skills base	<ul style="list-style-type: none"> • Meet demand for school places • Continue to support a high proportion of highly qualified residents
7. Employment	Facilitate and support employment opportunities	<ul style="list-style-type: none"> • Improve employment opportunities in key wards
8. Equality	Increase social mobility and inclusion	<ul style="list-style-type: none"> • Improve physical activity rates for low income population groups • Improve social mobility problems caused by selective schools
9. Health & Wellbeing	Improve health and wellbeing, and reduce health inequalities	<ul style="list-style-type: none"> • Meet demand for elderly care services • Help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers • Improve physical activity rates for at risk population groups • Address pockets of health deprivation • Meet need for accessible open or linear green space and recreation facilities • Ensure residents can access heritage assets
10. Heritage	Preserve and enhance historical and cultural	<ul style="list-style-type: none"> • Protect and enhance sites, features, areas and settings of archaeological, historical and cultural heritage importance especially

Topic	Objective	Recommendations for the new Local Plan.
	heritage assets	locally important assets vulnerable to change such as historic farmsteads
11. Housing	Provide sufficient housing to meet identified needs	<ul style="list-style-type: none"> • Meet identified needs for affordable housing • Meet demand for housing suitable for older people downsizing • Meet demand for 2 and 3 bed market housing to suit expanding families and older households downsizing • Make allowances in housing targets due to constraints in the borough • Facilitate insulation in older properties
12. Land use	Protect soils, and reuse previously developed land and buildings	<ul style="list-style-type: none"> • Protect Green belt • Develop on previously developed in preference to greenfield land • Prioritise development on lower grade agricultural soils
13. Landscape	Protect and enhance landscape and townscape	<ul style="list-style-type: none"> • Protect and enhance the High Weald AONB • Provide opportunities for management of new and existing woodland that would benefit local and global environment, landscape, biodiversity, recreation, tourism, jobs, health & wellbeing, water quality, flooding including consideration of tree disease • Protect and enhance Ancient Woodland • Strengthen Green Infrastructure • Protect and enhance historic landscape character and quality
14. Noise	Reduce noise pollution	<ul style="list-style-type: none"> • Consider noise pollution in Important Areas for Road Noise • Consider noise pollution from aircraft and trains?
15. Resources	Reduce the impact of resource consumption	<ul style="list-style-type: none"> • Prevent unsustainable demolition and rebuild projects • Improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding
16. Services & Facilities	Improve access to and range of key services and facilities	<ul style="list-style-type: none"> • Relatively small contribution to the local economy from tourism • Support superfast broadband connectivity in final 5% of the borough • Improve services and facilities especially in rural settlements
17. Travel	Improve travel choice and reduce the need to travel by private vehicle	<ul style="list-style-type: none"> • Support priority transport projects • Prioritise easy access to train stations within and outside the borough • Improve rural bus services and retain viability of urban bus services? • Support opportunities for active travel including cycling and walking
18. Waste	Reduce waste generation and disposal	<ul style="list-style-type: none"> • Support continued decline in household waste reduction • Improve rates of household waste diverted from landfill • Reduce construction waste
19. Water	Manage flood risk and conserve, protect and enhance water resources	<ul style="list-style-type: none"> • Reduce water consumption rates • Manage impacts from flooding • Not exacerbate flood risk on or off site • Support improvements in groundwater quality • Relieve pressures on ecology of water bodies from agriculture, water industry and rural land management activities

Appendix G

Compatibility with the NPPF

“The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole constitute the Government’s view of what sustainable development in England means in practice for the planning system”

NPPF paragraph 6

Table 19. Compatibility of Sustainability Objectives with the NPPF definition of sustainable development

NPPF Topic	NPPF Chapter	NPPF paragraphs	TWBC Sustainability Objective
Achieving Sustainable Development	Building a strong, competitive economy	18 – 22	3. Business growth 4. Climate Change & Energy 7. Employment
	Ensuring the vitality of town centres	23 – 27	3. Business growth 5. Deprivation 7. Employment
	Supporting a prosperous rural economy	28	3. Business growth 7. Employment 16. Services & Facilities 17. Travel
	Promoting sustainable transport	29 - 41	17. Travel
	Supporting high quality communications infrastructure	42 - 46	16. Services & Facilities
	Developing a wide choice of high quality homes	47 - 55	11. Housing 16. Services & Facilities
	Requiring good design	56 - 68	4. Climate Change & Energy 9. Health & Wellbeing 15. Resources
	Promoting healthy communities	69 - 78	1. Air 6. Education 9. Health & Wellbeing 13. Landscape
	Protecting Green Belt land	79 - 92	12. Land use
	Meeting the challenge of climate change, flooding and coastal change	93 - 108	4. Climate Change & Energy 19. Water
	Conserving and enhancing the natural environment	109 - 125	1. Air 2. Biodiversity 12. Land use 13. Landscape 14. Noise
	Conserving and enhancing the historic environment	126 - 141	10. Heritage
Facilitating the sustainable use of minerals	142 - 149	4. Climate Change & Energy 15. Resources 18. Waste	
Plan-making	Local Plans	150 - 157	All objectives are relevant to this topic
	Using a proportionate evidence base	158 - 177	
	Planning strategically across local boundaries	178 - 181	
	Examining Local Plans	182	
	Neighbourhood Plans	183 - 185	
Decision-taking	Decision taking	186 - 187	All objectives are relevant to this topic
	Pre-application engagement and front loading	188 - 195	
	Determining applications	196 - 198	
	Tailoring planning controls to local circumstances	199 - 202	
	Planning conditions and obligations	203 - 206	
	Enforcement	207	
Annex 1	Implementation	208 - 219	n/a

Appendix H

Consultation Report

Table 20 lists the answers given by consultees to the following questions:

Question 1

Based on the information provided in Appendix A, do you think that there are any additional relevant plans, policies, programmes or strategies that are missing from this review?

Question 2

Based on the information provided in Chapter 3, do you think that all the relevant indicators and targets have been included?

Question 3

Based on the information provided in Chapter 4, do you think that there are any other key sustainability issues, problems or cumulative effects that should be considered in relation to the Local Plan?

Question 4

Do you think these objectives are appropriate for the Borough?

Question 5

Have we identified all the potential conflicts between objectives?

Question 6

Do you think the proposed methodology for the Sustainability Appraisal is appropriate?

Question 7

Are there any other organisations that should be influencing the content of the Sustainability Appraisal for the Local Plan?

Further comments

Please record any additional comments that may be unrelated to the questions posed above

Table 20. Answers given by consultees to questions posed and TWBC’s response.

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
Horsmon-den Parish Council								The Parish Council look forward to seeing the next stage of the plan.	No response necessary. All parish councils to be consulted on future stages.
Tutu Aluko, Policy Advisor Local Air Quality DEFRA								Thank you for your email about ongoing consultation on Tunbridge Wells Sustainability Appraisal Scoping report. This is to acknowledge receipt of your email and indicate that we do not wish to comment at this stage, but will be interested in being kept informed as development of the plan progresses.	No response necessary. DEFRA to be consulted on future stages.
Bronwyn Buntine Kent County Council	Reference should be made to: the Flood and Water Management Act 2010; Kent County Council’s Local Flood Risk Management Strategy, including KCC’s Drainage and Planning Policy Statement ; and appropriate Surface Water Management Plans for Tunbridge Wells and Paddock Wood.	The only indicator is “properties at risk from flooding”. It is expected that all new development manages its’ own flood risk and that it should not exacerbate flood risk on or off site. It may be worth considering a measure to confirm that this is occurring through planning (specifically through the management of surface water).	The cumulative impact of increased water demand is not accounted for in Table 5.	Rather than “reduce” flood risk it may be more appropriate to state “manage” flood risk.	Yes.	Yes.	It would be appropriate to consult with Southern Water and Medway IDB.		<p>Q1 - Additional recommended plans and policies reviewed and added into Appendix A.</p> <p>Q2 - This data is currently not collected by the Borough Council. However, the general idea has now been incorporated into Table 18.</p> <p>Q3 - This is already considered in Table 7. Table 5 lists the potential root causes for the increased water consumption.</p> <p>Q4 - Tables 6 and 18</p> <p>Q7 - The Upper Medway IDB was part of this consultation (see paragraph 6.1.3) and did not respond. We will continue to include them on future consultation. South East Water will also be included.</p>

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
M Booker Royal Tunbridge Wells Town Forum Planning and Development Working Group	Appendix A appears comprehensive. Referring to Table 1 at para 2.21 on key findings we should prefer to see a reference to "relevant" housing rather than "increased" housing as the use of "increased" tends to prejudice the assessment which will be carried out under the local plan review.	Chapter 3 appears to have an adequate range of relevant indicators. Referring to tables 2,3,4 under para 4.21: We consider it vital to identify the need for social rented housing as under table 2. We similarly consider it vital to consider loss of employment floor space as under table 3.	The chapter seems to treat the issues comprehensively. However in relation to the transport section in table 5 we think the sources should include Network Rail and the National Infrastructure Commission as well as the Highways Agency.	Yes, the 19 objectives are appropriate for RTW.	It is difficult to say and we suggest that this area be kept under review as the Plan develops. With further regard to table 7. On school places we suggest that "may" should be changed to "will" as any increase in housing will undoubtedly lead to a demand for more school places unless housing is limited to age 55 plus. On housing and land use in RTW we suggest that this should state that meeting housing need "may" increase pressure on Greenfield sites. We should not prejudice the local plan review and there are other options to meet housing need in RTW.	Yes	Royal Tunbridge Wells Town Forum (in relation to RTW). We appreciate having been informally approached in relation to this consultation but as RTW lacks a Town Council we believe that the Town Forum should have the same consultative rights in relation to the new Local Plan as Town Councils in the Borough. Campaign to Protect Rural England, Kent Branch should also be added to the list of consultees in relation to land use and landscapes.		Q1 - Table 1 lists impacts upon the new Local Plan of the findings of the baseline assessment. The other aspects in this table refer to increases and reductions in a similar fashion. No change in wording necessary. Q2 - Noted. No amendments necessary. Q3 - Network Rail and the National Infrastructure Commissions now included as information sources in Table 5. Q4 - Noted. No amendments necessary. Q5 - Noted. No amendments necessary. Suggested change regarding education demand made in Table 7. Suggested change about greenfield land cannot be changed. There is not enough brownfield land in the borough to meet housing needs so it is certain that greenfield land will be required if we are to meet housing targets. Also, the Scoping Report considers the borough as a whole, not just RTW. Q6 - Noted. No amendments necessary. Q7 - Noted. The Town Forum and CPRE will be formally consulted on future iterations.
Matthew Woodcock Forestry Commission	Natural Capital: http://www.naturalcapitalcommittee.org	Would be useful to include a measure related to trees and woodland, for instance: -Total	Trees and woodland have the ability to deliver a whole range of benefits and hence cumulative effects.	Would be good to see a clear objective relating to energy use in respect of energy saving and	NO! However, would it not be more constructive to identify those areas where		As growth is such a major factor, an organisation/s which promotes	Threats such as tree diseases, in particular ash dieback, and storms (remember 1987) should be considered.	Q1 - Additional recommended plans and policies reviewed and added into Appendix A. Q2 - Woodland cover and woodland management details added to relevant

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
	<p>/natural-capital/Recommendation be given to the latest report and principles of valuing natural capital.</p> <p>District Heating: https://www.gov.uk/government/publications/the-future-of-heating-meeting-the-challenge</p> <p>In meeting sustainability criteria, appreciating the need for development and increased efficiency and to help improve air quality this approach is likely to gather momentum</p>	<p>woodland cover (Current National Forest Inventory suggests Borough has 7,215 ha of existing woodland i.e. 21.8% woodland cover);</p> <ul style="list-style-type: none"> -Ancient woodland cover (already included) – a high proportion of the above -Extend agric productivity to include woodland productivity – if 2/3rds of the Borough’s existing woodland were actively managed (i.e. their increment harvested) this equates to at least: 23,000m3 per year (of which 6,000m3 would be sawlogs – which could be used locally, and > 17,000 m3 of lower quality wood which could be used as a sustainable and low carbon fuel source – having an energy value of 35,000MWh similar to 3,500,000 litres of heating oil per year). Note: this measure relates to both economics and biodiversity as actively managed woods are more diverse and resilient to climate change! - % tree canopy cover in urban areas (relates to health 	<p>Key elements to consider include:</p> <ul style="list-style-type: none"> -Well managed woods sustainably deliver: -Carbon lean building materials and fuel; -Resilient landscapes and biodiversity; -Opportunities for local recreation and tourism; -Jobs (growth of the recreation facilities at Bedgebury have increased the number of jobs supported from the site from 10 to 50 over the last 10-15 years). -Green infrastructure: Provides opportunities for low carbon recreation and commuting; Improves health and well being; -Maintains landscape character (if well designed creates a positive interface between town and country); -Water quality and flood flows: The High Weald is a very ‘flashy’ catchment and can be prone to flooding from dramatic and/or extended 	<p>optimisation of existing Borough assets (e.g. biomass!) and use of low carbon materials in construction (weather boarded homes are traditional in the Borough!)</p>	<p>most benefits can be achieved? Positive as opposed to negative approach?!</p>		<p>sustainable growth etc.?</p>		<p>indicator. Discussions opened with Tree and Landscape Officers regarding % canopy cover data collection. Waiting for data to be published in Spring 2017.</p> <p>Q3 - Tables 4 and 18 updated to include reference to woodland management and associated benefits.</p> <p>Q4 - Energy and biomass is inherent to objective 4 (climate change) - see tables 4 and 18. Low carbon construction materials are considered by objective 15 (resources) - see tables 4 and 18. Title of objective changed to 'Climate Change & Energy' for clarity. Table 18 updated with more detail.</p> <p>Q5 - Identifying conflicts is a common task undertaken in Stage A4 of the SA. However, a compatibility table has been added to ensure positive, cumulative effects are also captured.</p> <p>Q7 - Not aware of an organisation that would be appropriate in this context.</p> <p>Q8 - Extreme weather scenarios are captured by the Climate Change objective. Further details have been added to Tables 17 and 18.</p>

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
		and wellbeing as well as biodiversity and urban drainage and increasingly easy to measure via remote technology.	periods of rain. Well designed and located new woods can help manage such flood flows as can measures within existing woods						
Claire Tester High Weald AONB Unit								<p>Thank you for consulting the High Weald AONB Unit on this Scoping Report.</p> <p>I note that 'Protecting the High Weald AONB' is identified as a key objective and that reference is made to the condition monitoring in the AONB Management Plan but no other specific indicators or measures are suggested. I also note that reference is made to heritage assets but this seems to be directed at buildings rather than landscape heritage. There is also a separate reference to 'Landscape Character and Quality (historic and existing)' but the evidence base for this is referred to as "to be completed".</p> <p>We will be starting to review the AONB Management Plan this year, which will include a Sustainability Appraisal, and it would be useful to discuss appropriate indicators and performance measures for the High Weald so we can share expertise and have some consistency between partners' Sustainability Appraisals on this issue.</p> <p>I am not sure what evidence base is referred to under 'Landscape Character and Quality' but if the High Weald AONB Unit is not already involved in this we would like to be!</p> <p>Happy to discuss.</p>	<p>No further indicators were available at the time of writing.</p> <p>The Historic Landscape Assessment and Landscape Character Assessments are being undertaken by consultants for TWBC. These studies are underway.</p> <p>Noted. TWBC will cooperate with this process. Comments have been forwarded to Landscape Officer (26/09/16).</p>
Alison Giacomelli Natural England	Natural England has not reviewed the plans listed in detail. However, we advise that the following types of	Natural England's view is that the indicators set out in Chapter 3 cover the areas we would like included. However, we have the following comments on the monitoring of targets, as we note that not all indicators set out in	Natural England welcomes the recognition, in table 2 that a healthy society depends on green open space, however, we would add that this open space needs to be accessible to all, we would also add that improving people's	Natural England supports the broad sustainability objectives set out in table 6. However, these do not provide the detail to be able to really test the policies in the plan. Therefore,	The broad-scale potential conflicts appear to have been captured.	We have no comment to make on the methodology.	We have no comment to make on the organisations consulted.		<p>Q1 - Following documents included in Tables 10 and 11: Green Infrastructure Plan, Landscape and Nature Conservation Supplementary Planning Document, Countryside and Coastal Access Improvement Plan (including Public Right of Way Improvement Plan), South East River Basin Management Plan, High Weald AONB Management Plan,</p> <p>Q2 - ANGst achievements described under social topic in Table 15. Other suggestion for</p>

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
	<p>plans relating to the natural environment should be considered where applicable to your plan area:</p> <ul style="list-style-type: none"> - Green infrastructure strategies - Biodiversity plans - Rights of Way Improvement Plans - River basin management plans - AONB management plans - Relevant landscape plans and strategies. 	<p>Appendix E have targets associated, and for those that do, the targets may not be directly linked to the Local Plan.</p> <p>As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p>	<p>access to nature could be through open space or linear routes.</p> <p>In table 4, we would add, under 'Biodiversity', that priority habitats need to be restored and expanded, to reduce fragmentation, and create ecological networks. Natural England welcomes the recognition, in table 2 that a healthy society depends on green open space, however, we would add that this open space needs to be accessible to all, we would also add that improving people's access to nature could be through open space or linear routes.</p> <p>In table 4, we would add, under 'Biodiversity', that priority habitats need to be restored and expanded, to reduce fragmentation, and create ecological networks.</p>	<p>we welcome the additional detail that is set out in Appendix F.</p> <p>We have the following comments on the recommendations set out in Appendix F:</p> <p>Biodiversity: There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding a recommendation that the new Local Plan "Ensure current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced". We also suggest the Local Plan could take an active role in promoting ecological networks by delivering habitat</p>					<p>monitoring has been passed onto technical officer for consideration and possible incorporation into next stage.</p> <p>Q3 - Amendments made to Tables 2 and 4</p> <p>Q4 - Amendments made to Appendix F (table 18)</p>

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
		<p>Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.</p> <p>Biodiversity:- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. ·Percentage of major developments generating overall biodiversity enhancement. ·Hectares of biodiversity habitat delivered through strategic site allocations. Landscape: ·Amount of new development in the High Weald AONB with commentary on likely impact. Green infrastructure: ·Percentage of the Borough's population having access to a natural greenspace within 400 metres of their home. ·Length of greenways constructed, Hectares of accessible open space per 1000popn.</p>		<p>creation. Biodiversity: Regarding Ashdown Forest, we suggest the recommendation should be to ensure that any development within the 7km zone of influence includes necessary mitigation measures to avoid an impact on Ashdown Forest under the terms of the Habitats Regulations. Health: We recommend the Local Plan should 'meet the need for green open space and recreation facilities <i>and for access to those open spaces (including linear routes) and facilities</i>'.</p>					

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
Anthony Farnfield Clerk to Goudhurst Parish Council	No	Yes	No	Yes	Yes	Yes	No	<p>Further Comments: Goudhurst Parish Council has concerns about and wishes to mention:</p> <ol style="list-style-type: none"> 1. Traffic volumes and particularly Heavy Goods Vehicles (HGVs) that use A262 east and westbound through Goudhurst causing frequent traffic jams and actual physical damage. To be controlled by SatNav legislation? 2. Increase in residential building will bring further use of local railways stations where there is already under provision of parking spaces. No further capacity at local stations with a 2 year waiting list. 3. Broadband. Goudhurst is shown as having superfast broadband. This gives the wrong impression. Parts of the parish have unacceptably slow speeds. This has a negative effect on people who work from home and is, we believe, a deterrent to start-up small businesses. 4. Goudhurst has +40 miles of Public Rights of Way (PROW). Goudhurst is keen that the PROWs should be kept in good order. We have the impression that KCC is not always able to meet their statutory duty to maintain the paths so the responsibility falls on the Parish. 5. We note there is no mention of Bedgebury Forest and the Pinetum in the Consultation Draft, although the Ashdown Forest (way outside the Borough is mentioned). 6. School Bus Services. Additional housing will bring an additional requirement for school bus services which, we hear from local families, are already under strain. 7. Heritage. Ensure the preservation of the Historic Hilltop character and aspect of Goudhurst 7. Education. The Primary School in Goudhurst is, in some years, oversubscribed. When the Kilndown Primary School (in this parish) closed and was merged with Goudhurst, people living in Kilndown were assured that their children would not be excluded from Goudhurst Primary if they fell outside a certain distance from Goudhurst. We believe that they have been and there have been occasions when children 'from without the parish' had been given preference over Kilndown children. 8. Walking to School. Walking to school from parts of Goudhurst is difficult due to the lack of safe crossing points on the busy A262. This leads 	<ol style="list-style-type: none"> 1. Traffic volumes are not considered under priority transport projects. However, Goudhurst does have an Important Area for Road Noise so traffic volume is considered indirectly here. 2. Easy access to railways considered in Table 15 and travel Objective 17 (Travel). 3. Broadband considered in Objective 16 (Services and Facilities) 4. Access to greenspace considered by Objective 9 (Health). Pedestrians also considered under Objective 17 (Travel) 5. Ashdown Forest is designated for reasons of internationally important ecology. Bedgebury is not. However, Bedgebury is an important attraction in terms of green space and so would be captured under the Objective 9 (Health) 6. Bus services captured under objective 17 (Travel) 7. Landscape and heritage captured under Objectives 10 and 13 7[sic]. KCC education is responsible for allocation of school places. However, the education objective captures meeting the demand for school places. 8. Active travel is promoted through the Objective 9 (Health) 9. Objective 11 (housing) considers whether allowances for environmental constraints have been made in housing targets 10. Objective 11 (housing) reflects greatest demands for housing including affordable and 2-3 bedroom. 11. Small and new business are considered in the Objective 3 (Business Growth)

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
								<p>to more traffic on the local roads.</p> <p>9. Housing Targets. We the question the validity of 13,000 new houses in the Borough over the 2013 – 2033 figure that does not take into account the large proportion of AONB and Conservation Areas in the Borough.</p> <p>10. Housing. Need for a proportion of new building to be 1-2 bed TO LET to assist the retention of some young people in the villages.</p> <p>11. Support for Parish Business Clubs.</p>	
Natalie Bumpus Wealden District Council	It is considered that the adopted Wealden Core Strategy and the emerging Wealden Local Plan should be included in the review so that any necessary in combination/ cumulative appraisal can be undertaken where necessary. It is welcome that data relating to Ashdown Forest concerning visitor / air quality and ecology is included.	It is unclear whether the Ashdown Forest SPA and SAC are included as specific sites of wildlife importance. It is considered that the SAC and SPA should be specifically recognised with indicators and targets given their importance.	It appears that the sustainability issues relating to the Ashdown Forest SAC and SPA are only concerned with issues of recreational pressure within 7km. There is no mention of issues concerning nitrogen deposition and no mention of the potential impact of this on the SAC. It is considered that both the Ashdown Forest SAC and SPA should be explicitly identified as issues to be considered in the SA of the Tunbridge Wells Local Plan.	Number 3 in Table 6 appears to be missing some text after 'including...'. The objectives put forward appear to be appropriate for the Borough in terms of addressing the issues. The inclusion of clarification questions for each SA Objective may help to assist in the assessment of the Local Plan against the Objectives. This would also provide the reader with an idea of what is being considered when looking at the plan and policies in relation to sustainability. It provides a little more transparency to the process.	The conflicts identified appear to be all relevant however it is considered that not all conflicts have been identified. This section should include conflict between those objectives which may impact on the Ashdown Forest SPA and SAC such as meeting housing needs may increase recreational pressure on the Ashdown Forest SPA from additional visitors; development may result in an increase in traffic movements across/close to the Ashdown Forest contributing to nitrogen deposition. In addition, the	Whilst the proposed methodology appears to be appropriate, it is unclear where the matter of mitigation is to be included. The review does not appear to include the consideration of mitigation measures and there is no inclusion of reasonable alternatives for mitigation. This is a crucial	No, all the relevant bodies and organisations appear to be included.	In general terms it is considered that the review appears to have a relatively light touch approach to the inclusion of the AONB as a consideration for sustainability.	<p>1 - Wealden policy documents now added into Table 11.</p> <p>2 - Amendments made to Table 17 under 'Wildlife sites of international importance'.</p> <p>3 - Tables 4 and 18 updated accordingly</p> <p>4 - Although, not phrased in the form of a clarification question, Table 18 lists the consideration in relation to each objective. A more detailed SA scoring system including questions will be available for consideration at Issues and Options stage, providing full transparency.</p> <p>5 - Extra text added into Table 7. Conflicts are shown in Figure 6.</p> <p>6 - An approach relating to how mitigation is dealt with has been described in the Issues and Options SA. This is that it will be assumed that mitigation will not be put in place unless this is a specific requirement within a policy i.e. a site allocation with specific and detailed policies. Potential mitigation measures are discussed in the description once scores have been applied. The Scoping Report has been updated too.</p> <p>Further comments. The AONB unit has been consulted and involved in fine tuning of scoring method for Issues and Options Stage.</p>

Consultee	Q 1	Q 2	Q 3	Q 4	Q 5	Q 6	Q 7	Q8 - Further Comments	TWBC Response
					potential impacts/conflicts between housing provision and landscape, including the High Weald AONB, have not been identified.	element which should be included in this review and within the SA.			
Jennifer Wilson Environment Agency	None identified at this time.	None identified at this time.	None identified at this time.	Yes	None identified at this time.	Yes	None identified at this time.	In Appendix B under "Water supply and stress" the hyperlink is duplicated.	Duplicated hyperlink has been deleted.

Consultee	1	2	3	4	5	6	7	8. Further Comments	TWBC Response
								<p>Thank you for your email of 27 June 2016 inviting comments on the Scoping Report for the above strategic environmental assessment.</p> <p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>Historic England is a statutory consultation body in relation to the SEA Directive. However, due to high volume of consultations being received in respect of the Directive, Historic England has prepared generic guidance with regards to our involvement in the various stages of the assessment process. This is attached as an annex to this letter.</p> <p>This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.</p> <p>Scoping <u>Introduction</u> When deciding on the scope and level of detail of the information that should be included in a SEA/SA the responsible authority must consult Historic England and allow 5 weeks from the date we receive the Scoping Report for comment. Historic England will particularly look to see how the historic environment is considered. In terms of SEA this covers cultural heritage, including architectural and archaeological heritage, landscape and material assets. Historic England recommends that Scoping Reports are tailored to the type, purpose, and level of plan under consideration. The tiering of Scoping Reports, through the use of an overarching report subsequently fine-tuned for particular documents, can help to reduce repetition and give a better focus to the appraisal framework. The Scoping Report should:</p> <p>review the objectives of other relevant policies, plans and programmes, with information on synergies or inconsistencies</p>	This has been completed and is described in Appendix A

Consultee	1	2	3	4	5	6	7	8. Further Comments	TWBC Response
								<p>establish the historic environment baseline including trends and gaps in data with notes on sources and any problems encountered</p> <p>identify issues and opportunities for the historic environment · set out the sustainability appraisal framework, SEA/SA objectives, indicators and targets where proposed for the historic environment</p> <p>provide sufficient information on the proposed methodology for the appraisal in order to assess whether effects upon the historic environment will be properly addressed</p> <p>consider cross-boundary issues.</p> <p>Relevant Plans, Programmes and Policies Historic England recommends that SEA and SA should include the review of the plans, programmes and policies listed below. This is not an exhaustive list, but includes plans and programmes which have a direct bearing on the historic environment. The review of these documents should:</p> <p>Summarise the contents highlighting historic environment aspects (direct and indirect)</p> <p>Draw out implications for developing SEA/SA objectives</p> <p>Draw out implications for the LDD and other relevant plans</p> <p>This review, often in tabular form, may be included as an Appendix; however it is also useful to include, within the main body of the report, a summary of the review and its implications.</p> <p>In addition the Planning (Listed Buildings and Conservation Areas) Act 1990 and Ancient Monuments and Archaeological Areas Act 1979 should be reviewed as setting the context for the protection and enhancement of the historic environment.</p> <p><u>International / European</u></p> <p>UNESCO World Heritage Convention</p> <p>European Landscape Convention</p> <p>European Spatial Development Perspective</p> <p><u>National</u></p> <p>National Planning Policy Framework</p> <p>National Planning Practice Guidance</p> <p>Historic Environment Good Practice Advice in Planning esp....</p> <p>Note 1 – The Historic Environment in Local Plans</p> <p>Note 2 – Managing Significance in Decision-Taking in the Historic Environment</p> <p>Note 3 – The Setting of Heritage Assets</p> <p><u>County/Local</u></p>	<p>of the Scoping Report</p> <p>This has been completed and is described in Appendix E and Appendix B of the Scoping Report.</p> <p>This has been completed and is described in Appendix E (Indicators, Baseline and Targets), Table 4 (issues and opportunities), and Table 6 (Objectives) of the Scoping Report.</p> <p>Methodology described in Chapter 5.2 and Appendix F but more details could be provided. Objective 10 (Heritage) has been reworded.</p> <p>Table 5 describes cumulative effects.</p> <p>World Heritage Convention not relevant to this borough.</p> <p>Included in Table 8.</p> <p>Now included.</p> <p>Included in Table 9.</p> <p>Included in Table 9.</p> <p>Now included.</p> <p>"</p> <p>"</p> <p>"</p>

Consultee	1	2	3	4	5	6	7	8. Further Comments	TWBC Response
								<p>National Park Management Plans</p> <p>AONB Management Plans</p> <p>Heritage/Conservation Strategies</p> <p>Landscape Strategies (including Historic landscape characterisation, urban characterisation)</p> <p>Cultural Strategies</p> <p>Sustainable Community Strategies</p> <p>Green Infrastructure Strategies</p> <p>Archaeological Strategies (linked to Urban Archaeological Databases)</p> <p>Conservation Area Character Appraisals and Management Plans</p> <p>Relevant SPG /SPD</p> <p>Village Design Statement, Parish Plan, Neighbourhood Plans</p> <p>Baseline Information</p> <p>Baseline information should describe the current and future likely state of the historic environment, providing the basis for identifying sustainability issues, predicting and monitoring effects and alternative ways of dealing with them. It can use both quantitative and qualitative information, and should be kept up to date.</p> <p>The information should be tailored to the scale, type and topic of the LDD or other relevant plan. There may also be a need to look at the wider geographic area in order to assess the likely significant environmental effects (e.g. traffic generation, setting issues).</p> <p>Not all information may be available immediately. Any gaps in information on the historic environment should be highlighted as part of the baseline description. The establishment of a robust and comprehensive baseline will also assist in the later testing of the soundness of DPDs. Ways of improving the availability of information can be included in proposals for monitoring the implementation of the plan.</p> <p>It is important that meaningful conclusions can be drawn from the baseline information; what it means for the plan and how the historic environment is to be dealt with.</p> <p>When collecting baseline information it is important that the historic environment is broadly defined. All designated historic assets should be considered together with potential impacts on non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place and local identity. This covers buildings, and other structures and features, archaeological remains, historic open spaces and the wider historic landscape/townscape.</p> <p>Statutory designations cover: World Heritage Sites, Listed Buildings (all grades), Scheduled Monuments plus other nationally important archaeological sites, Registered Historic Parks and Gardens, Registered Battlefields, Conservation Areas - and their settings.</p> <p>Other important considerations include: SMR /HER sites; locally listed heritage assets; the character of the wider historic landscape / townscape and other valued historic landscapes; areas of archaeological importance and the potential for unrecorded archaeology.</p> <p>Whilst illustrative material can, where appropriate, help bring clarity to the way in which information is presented; it is not easy to represent the historic environment spatially in a holistic way. Point data alone from individual designations do not provide an adequate overview. Historic landscape characterisation and urban characterisation can supplement this, broadening the understanding of the historic environment by describing the evolution of the present day landscape / townscape and identifying its surviving historic character. Through this process, an understanding about what gives a place its distinctive character and sense of place can be gained. Data is available from the county/unitary Historic Landscape Characterisation projects, Intensive and Extensive Urban Surveys and other urban characterisation projects. In addition, National Character Areas (Natural England) provide some measure of the degree of safeguarding or erosion of historic landscape features.</p>	<p>n/a as No National Parks in borough or close enough to borough to experience effects.</p> <p>Included in Table 10.</p> <p>All those known about are included in Tables 10 and 11.</p> <p>All those known about are included in Tables 10 and 11.</p> <p>All those known about are included in Tables 10 and 11.</p> <p>All those known about are included in Tables 10 and 11.</p> <p>All those known about are included in Tables 10 and 11.</p> <p>All those known about are included in Tables 10 and 11.</p> <p>None known of at regional or local level.</p> <p>Included in Table 11.</p> <p>All those known about are included in Table 11.</p> <p>No Neighbourhood Plans in the Borough have been adopted yet. However, several are in production.</p> <p>Addition made to table 11 in preparation for adoption.</p> <p>Baseline data included in Appendix E.</p>

Consultee	1	2	3	4	5	6	7	8. Further Comments	TWBC Response
								<p>The condition of the historic environment is an important consideration. Existing data sources include the annual Historic England Heritage at Risk Register which includes Grade I and II* listed buildings (with Grade II being added incrementally over the next few years); Scheduled Monuments; Places of Worship; registered Parks and Gardens; registered Battlefields; maritime Wreck Sites; and, Conservation Areas. Information derived from this ongoing work should be taken into account when updating baseline and monitoring frameworks. In addition, local authorities may have their own buildings at risk surveys for Grade II listed buildings and other buildings of local historic or architectural interest.</p> <p>Questions (adapted from Table 17 in Appendix 6 of Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents ODPM 2005) to help decide what baseline information to collect include:</p> <p>Which parts of the region/district are rich in cultural heritage?</p> <p>Is this cultural heritage at risk from damage or neglect?</p> <p>Which areas have been designated because of their historic or landscape quality (World Heritage Sites, National Parks, AONBs)?</p> <p>Where are the features of cultural heritage importance (e.g. listed buildings, scheduled monuments, conservation areas, historic parks and gardens, views and vistas, etc.),</p> <p>Are these historic assets at risk and what state are they in?</p> <p>Has the landscape and townscape character of the plan area been defined, what are its distinctive features?</p> <p>Is the distinctive character of the area under threat, if so how?</p> <p>Which locations should be conserved, restored or enhanced?</p> <p>Local Authority Conservation Officers and County Archaeologists hold useful sets of information and should be contacted at the earliest stage. It is likely that different regions may hold more detailed data sets than others; for example, the coverage of characterisation studies.</p> <p>When collating and analysing the baseline data on the historic environment it is useful to identify relevant comparators and targets. These can be informed by the plan review and drawn from national, regional and local data sets, such as heritage at risk. Further information on state of the environment and contextual indicators is given in the later section on indicators.</p> <p>Information Sources</p> <p>The list below serves as a menu of possible information sources and is not definitive.</p> <p><u>Core data sources</u></p> <p>General information, national and regional data sets, on the annual state of the historic environment is given in Heritage Counts: http://hc.historicengland.org.uk/</p> <p>National Monuments Record Centre, Swindon: www.pastscape.org.uk</p> <p>Images of England – comprises more than 240,000 photographs of listed buildings alongside the statutory list description providing a possible photographic monitoring tool: www.imagesofengland.org.uk</p> <p>Heritage Gateway: www.heritagegateway.org.uk</p> <p>Magic website: www.magic.gov.uk</p> <p>The National Heritage List for England online: https://www.historicengland.org.uk/listing/the-list</p> <p>Heritage at Risk Register: http://www.historicengland.org.uk/advice/heritage-at-risk</p>	<p>Further details have been incorporated in Appendix F. This list of questions will be considered in detail at next stage when determining how to score this objective.</p> <p>TWBC Conservation Officers were consulted during the production of this report.</p> <p>No targets available at time of writing.</p> <p>Websites and data sources have been checked. Slight amendment to Table 17.</p>

Consultee	1	2	3	4	5	6	7	8. Further Comments	TWBC Response
								<p><u>Regional / County / Local Data sets</u></p> <p>County Historic Environment Records / Sites and Monuments Record</p> <p>County/Unitary Historic Landscape Characterisation and or integrated landscape characterisation (HLC and Landscape Character Assessment)</p> <p>Local Authority: BAR register for Grade II listed buildings and buildings of local historic/architectural interest; Conservation Areas and relevant appraisals and management plans; other characterisation initiatives; local lists (buildings, parks and gardens)</p> <p>Extensive and Intensive Urban Surveys (Urban Archaeological Databases), refer to local authority and HER/SMR, · Urban characterisation (including extensive and intensive assessments of historical significance / rapid and whirlwind assessments e.g. HMRA, Suburbs)</p> <p>Parkland loss data (ref. regional Heritage Counts)</p> <p>Traditional farm buildings regional summaries: http://www.historicengland.org.uk/images-books/publications/historicfarmsteads-preliminary-character-statement-south-east/</p> <p><u>Other sources of information</u></p> <p>HELM - www.helm.org.uk</p> <p>Archaeological Data Service (ADS) provides a gateway to a range of historic environment information sources e.g. HEIRPORT Portal to SMRs. http://ads.ahds.ac.uk</p> <p>Aerial photographs: National Mapping Programme Aerial Photographs: https://www.historicengland.org.uk/images-books/aerial-photos/</p> <p>National and Regional skills report: http://hc.historicengland.org.uk/content/pub/2013/skills-needs-analysis-2013-repair-maintenance-energy-efficiency-retrofit.pdf</p> <p>Sustainability Issues</p> <p>Analysis of the baseline information for the historic environment and early consultation with local authority conservation officers and archaeologists who understand local issues and opportunities, and with other key stakeholders and local communities will help identify sustainability issues relating to the historic environment. This underlines the importance of a comprehensive baseline for the historic environment together with Local Plan community consultation as an effective means of identifying environmental issues and opportunities. Key issues should address opportunities as well as problems in relation to the historic environment. There is a need to understand the wider contribution of the historic environment to sustainable development and not simply view it as a narrow issue focused on preservation. An option that might be considered may be opportunities offered by heritage-led regeneration, heritage based sustainable tourism, place-making, design of new development to fit with the existing, functional layout of the town etc.</p> <p>Environmental problems, issues and opportunities affecting the historic environment, and to be addressed in the SEA/SA process may include:</p> <p><u>Problems</u></p> <p>Historic assets under threat or at risk from neglect or decay</p> <p>Areas of significantly degraded landscape / townscape</p> <p>Areas where, on current trends, there is likely to be further significant loss or erosion of landscape/ townscape character or quality</p> <p>Areas where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it</p> <p>Areas where landscape character or quality is being eroded because of changing farming or other land management practices</p> <p>Traffic congestion, air quality, noise pollution and other problems affecting the historic environment</p> <p>Areas where quality of life, including economic and social wellbeing, is significantly affected by the above environmental problems.</p>	<p>KCC Heritage Team and TWBC internal conservation teams consulted with for advice on this matter.</p> <p>Websites and data sources have been checked.</p> <p>Problems have been considered and Table 4 updated as appropriate (being mindful that local data collection is still underway).</p>

Consultee	1	2	3	4	5	6	7	8. Further Comments	TWBC Response
								<p><u>Issues</u></p> <ul style="list-style-type: none"> Environmental capacity issues Preserving and enhancing the designated and non-designated historic environment resource Conserving the industrial/commercial heritage of the area <p><u>Opportunities</u></p> <ul style="list-style-type: none"> Using the area’s historic environment resource (archaeology, built and industrial heritage) to contribute to local distinctiveness and sense of place and community engagement Promoting the innovative reuse of the existing building stock Improving awareness, involvement, and understanding of, and access to, the area’s historic environment Heritage-led regeneration opportunities, heritage based tourism, traditional building skills and the wider environmental economy, Using the historic environment as an educational resource <p>Sustainability Appraisal Framework</p> <p>The sustainability appraisal framework sets out the objectives, decision making criteria or sub-objectives and indicators to be used in undertaking the appraisal. Historic environment derivation of the framework, based on the preceding stages should be made clear. The framework should be prepared in consultation with local authority conservation staff. Where it is proposed to use a Panel to review the framework and undertake the appraisal it is important for historic environment interests to be covered through the inclusion of a heritage representative on the Panel, such as the local authority archaeologist or conservation officer.</p> <p>SEA/SA Objectives</p> <p>Whilst a specific objective for the preservation and enhancement of the historic environment will always be necessary, it may also be appropriate to address historic environment matters under other objectives such as those covering regeneration, tourism, access to services, quality of life, landscape and townscape. A sustainable outcome is better achieved by integration of this issue at all points of discussion.</p> <p>Recognising that the number of objectives should be manageable, the list below presents a selection of objectives which can be tailored to local authority circumstances and the level and subject of the plan under consideration. These are broad objectives, where a plan or document deals with a particular topic the objectives should be more specific. The list is divided into environmental, social and economic groups and includes objectives which may be applicable to other themes such as landscape and townscape.</p> <p><u>Environmental Objectives</u></p> <ul style="list-style-type: none"> To preserve and enhance sites, features, areas and settings of archaeological, historical and cultural heritage importance. To protect, enhance and manage the rich diversity of cultural and built environment and archaeological assets. To protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place. To protect, manage and, where necessary, improve local environmental quality. To achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality. To minimise waste by reducing demolition activities. <p><u>Social Objectives</u></p> <ul style="list-style-type: none"> To improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings To provide better opportunities for people to access and understand local heritage and to participate in cultural and leisure activities 	<p>As above.</p> <p>Objective compatibility considered in Figure 6 and opportunities will be explored in the Stage B assessment report on a site by site basis.</p> <p>Objective suggestions are applicable to Tunbridge Wells. Wording of heritage objective updated in Table 6. Appendix F also updated.</p>

Consultee	1	2	3	4	5	6	7	8. Further Comments	TWBC Response
								<p>Will it improve the satisfaction of people with their neighbourhoods as places to live</p> <p>Will it engage communities in identifying culturally important features and areas</p> <p>Will it provide for increased understanding and interpretation of the historic environment</p> <p><u>Economic Objectives</u></p> <p>Will it increase the economic benefit (e.g. heritage led regeneration, tourism, environmental economy, cultural economy) derived from the historic environment</p> <p>Will it promote the environmental economy</p> <p>Will it promote heritage-led regeneration</p> <p>Will it lead to the repair and restoration of an historic asset</p> <p>Will it make the best use of existing buildings and physical infrastructure</p> <p>Will it promote heritage based sustainable tourism</p> <p>Will it ensure that restoration and repair and maintenance is sympathetic towards the local environment</p> <p>Will it support the repair and reuse of historic buildings</p> <p>Will the initiative help to reduce the number of vacant buildings through adaptive re-use</p> <p>Indicators</p> <p>The selection of indicators for the historic environment may vary at different stages of the appraisal process and in relation to the particular LDD. State of the environment or contextual indicators can inform the baseline analysis, such as looking at the comparative range, quality and condition of historic assets and identifying possible targets. However, state of the environment indicators may not always be suitable for the appraisal or monitoring the significant effects of a plan. At these stages the priority should be devising indicators which will clearly demonstrate the impact(s) of the plan on the historic environment. Consideration should also be given to the required links between SEA/SA monitoring and the production of Local Plan Annual Monitoring Reports.</p> <p>Historic England’s annual series of national and regional reports, Heritage Counts, includes a suite of indicators for monitoring the extent, size and quality of the assets that comprise the historic environment. These should be supplemented, where possible, by locally derived indicators. For each baseline indicator enough information is needed to answer the following questions:</p> <p>How good or bad is the condition or quality of historic assets and places? Do trends show that it is getting better or worse?</p> <p>How far is the current situation from any established thresholds or targets?</p> <p>Are particularly sensitive or important elements of the historic environment affected?</p> <p>Are the problems reversible or irreversible, permanent or temporary?</p> <p>How difficult would it be to offset or remedy any damage?</p> <p>Have there been significant cumulative or synergistic effects over time? Are there expected to be such effects in the future?</p> <p>In devising historic environment indicators for the appraisal or monitoring of the significant effects of a LDD Historic England recommends that:</p> <p>the indicators relate to the accompanying objectives/sub-objectives (decision-making criteria);</p> <p>the indicators are appropriate and relevant to the level and subject of the plan under consideration;</p> <p>the indicators address positive and negative effects;</p>	

Consultee	1	2	3	4	5	6	7	8. Further Comments	TWBC Response
								<p>use is made of both qualitative and quantitative data;</p> <p>the indicators are kept under review as new data sets become available and or new issues are identified;</p> <p>accompanying targets are included.</p> <p>Selecting indicators which are directly linked to SEA/SA objectives is a complex process and with respect to the historic environment further exacerbated by the relative lack of consistently monitored data when compared to other topic areas. Notwithstanding this a robust monitoring framework for the historic environment must be included to meet the requirements of SEA/SA in terms of:</p> <p>Identifying any unforeseen adverse effects of implementing the plan and enabling appropriate remedial action to be taken.</p> <p>Testing the accuracy of predictions made in the SA and improving future practice.</p> <p>Checking the delivery and performance of mitigation measures.</p> <p>Determining whether the plan is contributing to the achievement of the objectives and targets for the historic environment.</p> <p>Collecting information for future LDDs.</p> <p>The table below presents <u>examples</u> of indicators which can be tailored to local authority circumstances and the level and subject of the plan under consideration. The table shows the different ways in which indicators can be framed to: describe the baseline or state of the environment; monitor the type of impact or outcome; and track wider policy responses or actions taken to improve the environment, mitigate degradation (including avoiding or rectifying adverse impacts), and conserve the historic environment. A combination of different types of indicators is likely to be necessary as part of an appraisal. However, the priority should be the inclusion of indicators which clearly demonstrate the impact(s) of the plan on the historic environment.</p> <p>The indicators included in the table are based on practice to date and emerging initiatives. Local authorities and other partners, however, are encouraged to keep under review and be innovative in developing indicators and monitoring frameworks for the historic environment.</p> <p>[see attached response for table showing examples of indicators]</p>	<p>Indicators are shown in Table 17 with advice that further data collection is underway.</p>