

Tunbridge Wells Borough Council

Sustainability Appraisal of the Local Plan

Adoption Statement

December 2025



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Document History

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

Sustainability Appraisal Scoping Report (Stage A)

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 with statutory bodies and other interested parties, and consideration of new studies.

Sustainability Appraisal (Stage B/C)

Date	Title	Content
May 2017	Sustainability Appraisal Assessment Report Issues and Options Stage Consultation Draft	Issue for consultation alongside Local Plan Issues and Options Report.
Dec 2017 and May 2019	Sustainability Appraisal Assessment Report Issues and Options Stage Final Report	Updated following consultation with statutory bodies and other interested parties, and consideration of new studies. Latest update includes minor changes.

Date	Title	Content
July 2019	Sustainability Appraisal of the Draft Local Plan Consultation Draft	Issue for consultation alongside Reg 18 Draft Local Plan Report.
Feb 2021	Sustainability Appraisal of the Reg 19 Pre- Submission Local Plan Consultation Draft	Issue for consultation alongside the Reg 19 Pre-Submission Local Plan.

Sustainability Appraisal (Stage C/D)

Date	Title	Content
Oct 2021	Sustainability Appraisal of the Submission Local Plan Submission Draft	Issue for submission alongside the Submission Local Plan.
Mar 2022	Sustainability Appraisal of the Submission Local Plan Submission Draft	Reissued to correct two minor errors on Table 12 identified during the Examination process.
Oct 2023	Sustainability Appraisal of the Submission Local Plan Post Examination Addendum Part 1 – Strategic Sites	Addendum to address additional work required on strategic site policies.

Date	Title	Content
Mar 2025	Sustainability Appraisal of the Submission Local Plan Post Examination Addendum Part 2 – Main Modifications	Addendum to address Main Modifications raised at Examination, consulted upon alongside the Main Modifications Schedule March – April 2025.
Oct 2025	Sustainability Appraisal of the Local Plan Post Examination Addendum Part 3 - Sustainability Appraisal of Final Main Modifications	Issued to accompany Adoption Local Plan.

Sustainability Appraisal (Stage E)

Date	Title	Content
Dec 2025	Sustainability Appraisal of the Submission Local Plan – Adoption Statement This document	Issued to fulfil the SEA Regulations requirements for an adoption statement.

1. Introduction and context

Sustainability Appraisal Background

1. Tunbridge Wells Borough Council (TWBC) adopted the [Tunbridge Wells Borough Local Plan](#) in December 2025. A Sustainability Appraisal (SA) is required during the preparation of a Local Plan by the [Planning and Compulsory Purchase Act 2004](#), which incorporate the requirements of the [Environmental Assessment of Plans and Programmes Regulations 2004](#) (commonly referred to as the 'Strategic Environmental Assessment (SEA) Regulations'). The purpose of the Sustainability Appraisal is to promote sustainable development through assessing how effectively the Local Plan contributes to relevant environmental, economic and social objectives.
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). The SA documents produced for each stage are set out in the document history list on pages 3-5.
3. Regulation 26 of the [Town and Country Planning \(Local Planning\) Regulations 2012](#) requires the SA report to be available as soon as reasonably possible following the adoption of the Local Plan. The most up-to-date, full SA Report is the [SA of the Submission Local Plan \(March 2022 version\)](#). Additional SA work was undertaken during the examination of the Local Plan to appraise the proposed modifications required for soundness reasons. [SA Addendum Part 1](#) considers the modifications to the development strategy and strategic sites with [Part 2](#) considering Main Modifications that were consulted on between March and April 2025. Lastly, [SA Addendum Part 3](#) considers the Main Modifications recommended by the Inspector, incorporated into the adopted Local Plan.
4. The [Inspector's Final Report](#) on the examination of the Local Plan was received in October 2025. The Inspector concluded the Council's SA process was adequate and the reasonable alternatives were considered to a sufficient degree (IR paragraphs 31 to 39). Receipt of the Inspector's Final Report marked the end of the Local Plan Examination.
5. Following the conclusion of the examination, the Local Plan has been adopted, incorporating the Main Modifications recommended by the Inspector. This SA Adoption Statement therefore marks the start of Stage E in Figure 1 below. Stage E will continue through the post adoption monitoring set out in section 5 of this document, and through responding to any adverse effects in future development plan documents.

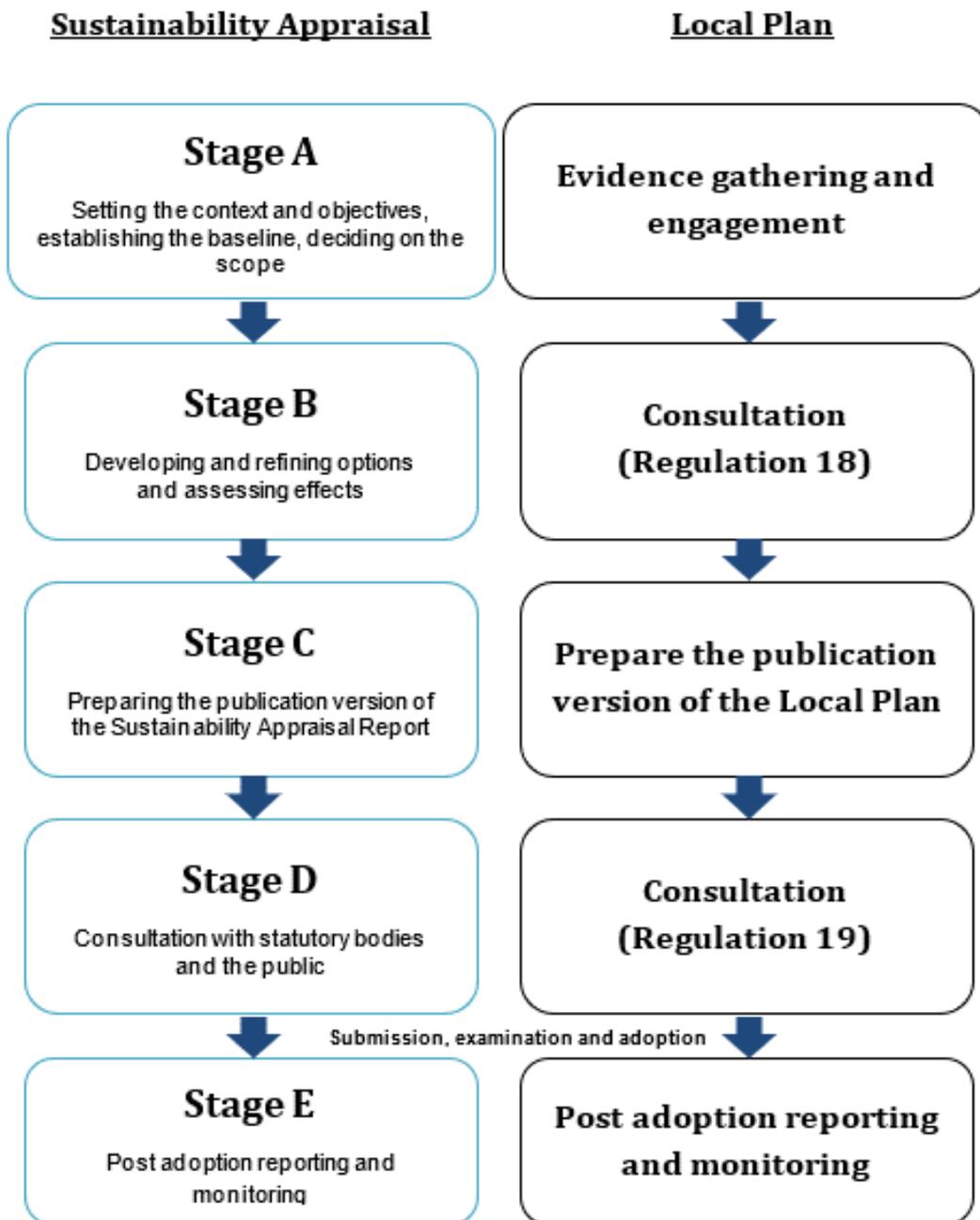


Figure 1: Key stages of Local Plan preparation and the relationship with the SA process. (Adapted from Planning Practice Guidance Reference ID: 11-013-20140306.)

Requirement for the Adoption Statement

6. The requirement for an Adoption Statement arises from Regulation 16 of the SEA Regulations, which requires the publication of a statement addressing:
 - (a) how environmental considerations have been integrated into the plan or programme;
 - (b) how the environmental report has been taken into account;
 - (c) how opinions expressed in response to—
 - (i) the invitation referred to in regulation 13(2)(d);
 - (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
 - (d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
 - (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme
7. The structure of this adoption statement is structured as follows:
 - Section 2 addresses part (a) of the requirements.
 - Section 3 addresses parts (b) and (e) of the requirements.
 - Section 4 addresses parts (c) and (d) of the requirements.
 - Section 5 addresses part (f) of the requirements.

2. Integrating Environmental Considerations

8. Environmental considerations have, alongside other sustainability considerations, been integrated into Sustainability Appraisal throughout the process, the first stage of which was the [SA Scoping Report](#) produced in 2016.
9. The Scoping Report identified environmental issues through the review of relevant plans, policies and programmes and the analysis of baseline information. Section 4 of the Scoping Report sets out the sustainability issues identified through this process, with sections 2 and 3 setting out the key findings from the review of relevant plans, policies and programmes and the baseline indicators used to identify these sustainability issues. Subsequent SA documents incorporated relevant updates to the baseline data. For instance, section 4 of the [SA version for the Submission Local Plan](#) lists updated evidence base studies and updates to/additional plans, policies and programmes along with noting their implications for the SA.
10. The identified sustainability issues were used to develop the sustainability objectives which the spatial development strategy and policies in the Local Plan were assessed against. These objectives are shown in table 1 below. The next section covers how the results of this assessment was considered in the production of the Local Plan.

Table 1 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	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	Improve health and wellbeing, and reduce health inequalities
10	Heritage	Protect and enhance 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 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

Num.	Topic	Objective
19	Water	Manage flood risk and conserve, protect and enhance water resources

Habitats Regulations Assessment

11. Planning practice guidance ([Paragraph: 011 Reference ID: 11-011-20140306](#)) requires a sustainability appraisal to take account of the findings of a Habitats Regulations Assessment (HRA), if one has been undertaken. Throughout the production of the Local Plan, an HRA has been undertaken to assess the potential impacts of the Local Plan on the Ashdown Forest (both a Special Area of Conservation (SAC) and a Special Protection Area (SPA)). The findings of the HRA influenced the scoring of the SA for the biodiversity objective. The most recent version of the [HRA is that for the final Main Modifications \(October 2025\)](#). It is noted, however, that earlier versions of the HRA, which can be found in the [Core Documents List](#), informed the various iterations of the SA.

3. How the SA Report has been taken into account, and the reasons for choosing the preferred options

12. Section 2 illustrates how the SA Scoping Report was used to identify sustainability issues and how these informed the development of the sustainability objectives as part of the SA methodology. This methodology was applied iteratively through out the subsequent stages of the Local Plan production process.

Sustainability Appraisal Issues and Options Report

13. An Interim SA Report (see the [2019 version](#) which included minor updates to the 2017 version) was produced to support the [Local Plan Issues and Options Regulation 18 consultation document](#). This report tested the strategic objectives which guided the production of the Local Plan against the sustainability objectives. Section 4.1 details the results of this testing with section 5.1 detailing recommendations to improve the compatibility of the strategic objectives. These objectives were rewritten in the next stage of the Local Plan production process, the Regulation 18 [Draft Local Plan \(DLP\)](#), and incorporated many of the recommendations from the SA report.
14. This SA Report also tested the following growth strategy options:
 - (1) Focused Growth
 - (2) Semi-Dispersed Growth
 - (3) Dispersed Growth
 - (4) Growth-Corridor Led Approach
 - (5) New Settlement Growth
 - (6) Business As Usual Approach (No Local Plan)
15. Section 4.2 details the scoring, summary and recommendations of these options. Observations of how each approach differs in relation to the sustainability objectives and how the adverse impacts could be mitigated/benefits maximising for the growth strategy options is explored in section 5.2.
16. Paragraph 5.3.1 concludes with recommending growth strategy 5 to be investigated further, with elements of growth strategy 4 to make up any shortfall in development needs. This was caveated with a need to consider locational constraints and all the options, except for option 6, had a mix of positive and negative scores. The DLP proposed a combination of options 3 and 5 to meet the borough's housing growth needs, with a combination of options 1, 2, and 4 to meet the employment growth needs. Paragraphs 4.28-4.40 of the DLP sets out the rationale for choosing this strategy.

Sustainability Appraisal of the Draft Local Plan

17. The [SA Report for the DLP](#) appraised or compatibility tested the DLP in five contexts:
 - Compatibility testing of the strategic objectives

- SA of the spatial development strategy
 - SA of the strategic policies
 - SA of the potential development sites
 - SA of the development management policies
18. In this order, the following subsections address how the SA report was taken into account and the reasons for choosing the preferred options.
19. Appendix B of the SA Report suggests mitigation measures and recommendations for the:
- Strategic objectives
 - Strategic objectives including the spatial development strategy
 - Potential development sites
 - Development management policies
20. The DLP took account of these recommendations and made relevant changes.

Compatibility Testing of Strategic Objectives

21. Section 5 of the SA report tested the compatibility of the revised strategic objectives with the sustainability objectives. Nine out of the ten strategic objectives were more compatible than incompatible with the sustainability objectives. The exception was the strategic objective for housing (objective 4) due to the conflict between environmental constraints and high demands for housing. None of the sustainability objectives were more incompatible than compatible with the strategic objectives, although there were a number of mixed and uncertain scores.

SA of the Spatial Development Strategy

22. Section 6 of the SA report re-assessed the growth strategy options in light of new and updated baseline and locational information, such as the information gained through the production of other evidence base documents. Two additional growth strategies were also assessed. These were Growth strategy number 7: Growth including Sevenoaks Unmet Need and; Growth strategy number 8: Dispersed Countryside Growth
23. The preferred strategy arising from this appraisal was a combination of options 1-5, as set out in paragraph 6.2.9 of the SA Report. This can be split up into provision for infrastructure-led, housing needs in line with options 3 and 5, and provision for economic needs based on options 1, 2 and 4. This is in-line with the strategy chosen for the DLP, and which was assessed in Table 15 in the SA Report, with paragraph 6.2.11 observing:
- The economic objectives score mostly positively
 - Most of the social objective score more positively
 - The environmental objectives score well relative to alternative strategies
24. Alternatives to specific key elements of the strategy were also considered as part of the SA. These were alternatives for:

- i. the location for a garden settlement
 - ii. the scale of development for a garden settlement
 - iii. the location for an urban extension
 - iv. the scale of development for an urban extension
25. Table 13 in the SA Report sets out the garden settlement and urban extension location options considered by the SA with explanations of the approaches taken by the SA. Two garden settlement growth options and four urban extension growth options were assessed. These were scored in tables 16 and 17 of the SA Report respectively with the commentary following the tables explaining the reasons for the preferred options chosen in the DLP.

SA of the Strategic Policies

26. Section 7 of the SA Report details the results and commentary of the sustainability appraisals for each of the strategic policies. For each policy, except for Policy STR 4 Green Belt, an alternative was assessed in which the policy was not included in the DLP, instead relying on relevant national policy and legislation. All of the strategic policies scored better or equal to the alternative of no policy.
27. Policy STR 4 Green Belt was the exception to this as it related to specific releases of Green Belt land. Because of this it was deemed appropriate to do a cumulative impact assessment for this policy. Appendix D of the SA Report sets out the scoring for this cumulative impact assessment.

SA of the Potential Development Sites

28. Section 8 of the SA Report covers the potential development sites considered for the DLP. All sites submitted to the Council's Call for Sites were first considered for this. A number of sites were then filtered out as they were not considered reasonable alternatives requiring a sustainability appraisal, although, some were subsequently re-assessed as part of the ongoing, iterative site assessment process. Paragraph 8.1.4 sets out the reasons for why sites were filtered out and not considered reasonable alternatives for SA purposes.
29. Summary tables for the allocated sites in each parish (and the unparished area of Royal Tunbridge Wells) are included in section 8.2 along with the cumulative impacts of these sites and the reasonable alternatives considered. Appendices E-T provide more detailed commentaries for individual sites. Measures were proposed to enhance the beneficial impacts and reduce adverse impacts for the sites, which were included in the development parameters of individual site allocations and strategic policies for parishes wherever possible. Appendix B provides examples of the site specific recommendations.

SA of the Development Management Policies

30. Section 9 of the SA Report details the SA process and results for the development management policies. The following reasonable alternative options were applied to the development management policies:
- Option 1: No policy – rely on National Planning Policy Framework (NPPF)/Planning Practice Guidance (PPG) where policy/guidance relating to a particular topic or policy area applies. Where the NPPF/PPG requires that a specific policy is provided in the

local plan e.g. climate change, bio/geodiversity, water supply, air quality, custom/self build, Gypsies and Travellers and therefore, 'No Policy' was not an option in these cases.

- Option 2: 'No policy' – where there is no reference to a particular topic or policy area in the NPPF/PPG.
 - Option 3: Keep the existing 2006 Local Plan Policy(ies) and/or 2010 Core Strategy Policy(ies) (where applicable).
 - Option 4: Revision/amendment to existing 2006 Local Plan Policy and/or 2010 Core Strategy Policy (where applicable). This was applied where a similar policy could have been considered with an update due to change in circumstances and/or relevant guidance.
 - Option 5: New Policy – application of the new development management policy as set out in the Draft Local Plan.
 - Option 6: A different type of option(s) was applied where there is a clear/alternative approach e.g. affordable housing, build to rent as there may be further options or thresholds available.
31. There were no alternatives deemed reasonable for Policy EN 13 – Ashdown Forest Special Protection Area and Policy EN 16 – Green Infrastructure for the reasons set out in paragraphs 9.1.6 and 9.1.7 of the SA Report.
32. Section 9.2 includes a discussion and commentary for each of the proposed development management policies and the reasonable alternatives. Paragraph 9.3.1 summarised the findings from this exercise, noting that the preferred development management policies in the DLP make a clearly positive contribution towards meeting the sustainability objectives.

Sustainability Appraisal of the Pre-Submission Local Plan

33. The [Sustainability Appraisal Report for the Pre-Submission Local Plan \(PSLP\)](#) followed a similar structure to the SA Report for the DLP. The following sub-sections will therefore follow the same structure and focus on the changes to the Local Plan between the Regulation 18 Draft Local Plan and the Regulation 19 Pre-Submission Local Plan versions and the updated scoring for these changes.

Compatibility Testing of Strategic Objectives

34. The strategic objectives went through further iteration and thus a further assessment of these was deemed necessary. The results of these are, however, similar to the compatibility testing done for the DLP. This is detailed in section 5 of the SA Report.

SA of the Spatial Development Strategy

35. As drafts of the Local Plan were being developed, numerous further alternative growth strategies were identified for consideration through the SA. The alternatives considered a range of different scales and distributions for development across the borough and were informed by the most favoured sites in the [Strategic Housing and Economic Land](#)

[Availability Assessment \(SHELAA\)](#) at this and previous stages of the Local Plan production process. These options are listed below with section 6.1 of the SA Report providing further detail on the options and how they were developed.

- Option 1: No Green Belt Loss: housing supply – 346 dwellings per year, strategic sites – no.
- Option 2: No AONB majors: housing supply – 560 dwellings per year, strategic sites – yes.
- Option 3: Draft Local Plan: housing supply – 678 dwellings per year (capped existing need), strategic sites – yes.
- Option 4: Main Towns: housing supply – 678 dwellings year, strategic sites – Paddock Wood and east Capel only.
- Option 5: Main Towns and Large Villages: housing supply – 678 dwellings, strategic sites – no.
- Option 6: Meet Need With No Green Belt Loss: housing supply – 678 dwellings, strategic sites – no.
- Option 7: Proportional to Services: housing supply – 678 dwellings per year, strategic sites – no.
- Option 8: Services and AONB: housing supply – 678 dwellings per year, strategic sites – no.
- Option 9: Dispersed Countryside: housing supply – 678 dwellings per year, strategic sites – yes.
- Option 10: Uncapped Need: housing supply – 741 dwellings per year, strategic sites – yes.
- Option 11: Uncapped and Unmet Need: housing supply – 853 dwellings, strategic sites – yes.
- Option 12: No Local Plan.
- Option 13: Pre-Submission Local Plan – a suitable strategy developed following a review of the findings of options 1-12.

36. These options were scored in section 6.2 of the SA Report which also details how option 13, the preferred option, was developed. The approach taken for developing the strategic site locations and scale options, and for the strategic transport options is also covered in section 6.2 along with the scoring for these options.

SA of the Strategic Policies

37. The SA Report for the Strategic Policies in the PSLP appraised the same alternatives to that in the DLP (i.e. no policy). Where the policy wording in the PSLP was materially different in the PSLP compared to the DLP, this was assessed as a further alternative. The strategic Green Belt policy (now Policy STR 9) was again an exception to this and instead subject to a cumulative impact assessment of all the sites allocated in PSLP which included a release of Green Belt land.

38. The results of the SA scoring for the strategic policies and alternatives is set out in section 7.2 of the SA Report, with the cumulative impact assessment for the Green Belt

sites set out in Appendix E. The findings are summarised in section 7.3 which concludes that the preferred strategic policies as set out in the PSLP make a positive contribution towards meeting the sustainability objectives.

SA of the Potential Development Sites

39. The approach to appraising the potential development sites for the PSLP was the same as for the DLP. Sites submitted since the DLP were assessed using the same SA methodology for potential inclusion in the PSLP.
40. Section 8.2 of the SA Report contains summary tables, including cumulative impact assessments, for each parish (and the unparished area of Royal Tunbridge Wells). More detailed commentaries for individual sites are in appendices F-U of the SA Report.

SA of the Development Management Policies

41. The approach to appraising the development management policies for the PSLP was the same as for the DLP. The scoring and commentary for each of the development management policies and reasonable alternatives is detailed in section 9.2 of the SA Report, with the main findings summarised in section 9.3.

Sustainability Appraisal of the Local Plan – Version for Submission

42. The [Submission Local Plan \(SLP\)](#) was the PSLP with the inclusion of a number of ‘minor modifications’ to provide factual updates, typographical corrections and amendments/additions primarily for reasons of improved clarity or consistency. These modifications are set out in the [Schedule of Additional \(Minor\) Modifications](#), submitted as part of the document package for Local Plan Examination.
43. The [‘Version for Submission’ SA Report](#) was produced to accompany the SLP. This likewise incorporated factual updates, typographical corrections and amendments/additions primarily for reasons of improved clarity or consistency. Additionally, a number of new sites submitted were appraised. These were the sites prefixed ‘PSPC’ and site DPC_23 (the other ‘DPC’ sites were assessed in the PSLP SA Report).
44. The simplest way of finding the results of the sustainability appraisals for these sites is to see the ‘sustainability assessment’ rows for the sites in the SHELAA addendums produced specifically for these sites (see the [April 2021 SHELAA addendum](#), and the [October 2021 SHELAA addendum](#)). The full SA scoring for these sites can be found in the relevant parish/Royal Tunbridge Wells appendix of the SA report (appendices F-U).

Sustainability Appraisal – Examination Addendums

45. The examination of the Local Plan assessed the SA alongside the Local Plan, including how the findings of SA were taken into account in the plan-making process.
46. Three addendums to the SA were also produced during the course of the examination to ensure the sustainability objectives were assessed against the proposed modifications

required for soundness reasons. The following sub-sections summarise how each of the addendums were taken into account.

Part 1 – Development Strategy and Strategic Sites

47. The [first SA examination addendum](#) was produced to identify the implications of the [Local Plan Development Strategy Topic Paper – Addendum \(DSTPA\)](#). This was produced in response to the [Inspector’s Initial Findings](#) on the examination of the Local Plan. The DSTPA proposed changes to the SLP in response to the Inspector’s initial findings, and were made to ensure the Local Plan could be found sound and adoptable, particularly around the Plan’s overall development strategy.
48. To support the DSTPA, a [Green Belt Stage 3 Study Addendum](#) was produced to assess reasonable alternative sites not explicitly assessed previously (noting that they were only assessed under the larger parcels at Stage 2 Green Belt assessment work). Further SA work was done on sites where the Green Belt scoring had improved through the Stage 3 Study Addendum. Section 4.2 of the SA Report sets out the affected sites and the additional SA work undertaken. Section 5 contains the scoring and commentary for the sites which were reassessed. As the further Green Belt assessments do not provide a basis for concluding that previously rejected sites should come forward into the Local Plan, save for a couple possible exceptions, no significant new development strategy options were identified.
49. The draft alterations to the strategic site policies were identified to have implications on the SA scoring (see section 4.3 of the SA Report). Section 6.1 and 6.2 of the SA Report assesses the draft alterations and alternative revisions for both Tudeley Village and the strategic growth at Paddock Wood and east Capel. The impacts on the overall development strategy of the revisions in combination were assessed in section 6.3 of the SA Report. Six new development strategy options were assessed. The differences in the scoring across the new options was marginal. In terms of the three options for Paddock Wood and land at east Capel, there was merit in two of the options, Revision A and Revision B, with Revision B being the chosen option in the DSTPA.

Part 2 – Main Modifications

50. The [SA Examination Addendum Part 2](#) was produced to identify any implications of the [Schedule of Proposed Main Modifications](#) which were consulted on between 17th March and 30th April 2025. The screening of proposed modifications to policies for any potential implications on the SA is set out in section 4 of the SA Report, except for the modifications to the strategic site policies which were assessed in the SA Examination Addendum Part 1.
51. The scoring and commentary of the policies which were reassessed following the screening exercise is detailed in section 5 of the SA Report. Summaries for each of the affected parishes and Royal Tunbridge Wells are included with a consideration of cumulative impacts. No changes were significant enough to warrant a change in the cumulative impacts for any of the parishes/Royal Tunbridge Wells, except for Cranbrook and Sissinghurst, and Hawkhurst. The scores for policies STR/CRS 1 and STR/HA 1 (cumulative impacts) and policies relating to housing allocations were amended to reflect the closure of a non-selective secondary school in Cranbrook in 2022. Applicable policies

were downgraded slightly resulting in policies STR/CRS 1 and STR/HA 1 now scoring a neutral score for the equality objective.

52. In terms of the development management policies, none of the alterations in the scoring were significant enough to warrant a reconsideration of previously considered reasonable alternatives.

Part 3 – Final Main Modifications

53. The [SA Examination Addendum Part 3](#) was produced following receipt of the [Inspector's Final Report](#) on the examination of the Local Plan and the appendix which contained the final [Schedule of Main Modifications](#). This SA Report followed the same structure to the Part 2 Examination Addendum to consider the changes made by the Inspector to a few of the main modifications. This SA Report came to the same conclusions as the Part 2 Examination Addendum.

4. Consideration of the public consultation and opinions of consultation bodies

54. The main documents produced for each stage of the SA process have been subject to consultation. The following subsections covers how the responses from both the public and the consultation bodies (Natural England, Historic England and the Environment Agency) have been taken into account.

Sustainability Appraisal Scoping Report

55. A draft of the SA Scoping Report was subject to a consultation with the three consultation bodies as well as numerous local organisations. Following the consultation, the final [SA Scoping Report](#) was produced. Section 6 of the SA Report lists those who were consulted. Appendix H lists the representations made to the consultation along with the response from TWBC and any amendments made as a result of the representation.

Sustainability Appraisal Issues and Options Report

56. The initial consultation for the [SA Report to support the Local Plan Issues and Options document](#) followed a similar process to the scoping report. Section 7.1 of the SA Report lists those who were consulted, with section 7.2 listing the changes made following the consultation. Appendix C lists the full responses to the consultation along with the TWBC response and any associated amendments.

57. The SA Report was also consulted on alongside the Local Plan Issues and Options public consultation. Appendix 1 of the [Consultation Statement for the DLP](#) summarises the key issues referred to for each of the consultation questions and the Council's consideration of those issues. Questions 6m and 6n relate specifically to the Sustainability Appraisal.

Sustainability Appraisal of the Draft Local Plan

58. The [SA of the DLP](#) was consulted on alongside the consultation on the DLP. Part 2 of the [Consultation Statement for the PSLP](#) contains the consideration of the responses to the consultation on the DLP. Section 8 of Part 2 of the Consultation Statement addresses the issues raised by comments made by the public and consultation bodies.

59. The [SA of the PSLP](#) also notes where scores were amended to address comments made during the DLP consultation.

Sustainability Appraisal of the Pre-Submission Local Plan

60. The [SA of the PSLP](#) was consulted on alongside the consultation on the PSLP. Appendix 1(C) of [Part 2 of the Consultation Statement for the Submission Local Plan](#) details the main issues raised in relation to the SA alongside the TWBC response and any consequential changes made.

Sustainability Appraisal – Examination Addendums

61. The SA Examination Addendum Part 1 was consulted on alongside the [Local Plan Development Strategy Topic Paper Addendum](#) and a suite of other evidence base documents. The comments made in relation to the SA Addendum and the response to those comments from TWBC are set out in this [summary table](#).
62. The SA Examination Addendum Part 2 was consulted on alongside the [Schedule of Proposed Main Modifications](#). None of the comments received during this consultation related to the SA.

5. Monitoring the Sustainability Appraisal Objectives

63. The SEA Regulations state that monitoring must be undertaken on the likely significant environmental effects of the implementation of each plan or programme in order to identify at an early stage unforeseen adverse effects and be able to undertake appropriate remedial measures. In line with the integrated approach to impact assessment, monitoring these through the SA is a way of demonstrating success in delivering the Local Plan’s targets and reducing its environmental, social and economic impacts.
64. The role of the SA monitoring is to measure the SA indicators and establish a causal link between the implementation of the Local Plan and the likely significant effect being monitored. This enables TWBC to carry out an evaluation of the effectiveness of the Local Plan as a whole in facilitating sustainable development.
65. A proposed monitoring framework has been developed throughout the SA process. The most recent version of this, taken from the [SA of the Submission Local Plan](#), is shown in the table below. These indicators will be monitored through the Council’s annual [Authority Monitoring Report \(AMR\)](#). How each of these indicators will be monitored along with the frequency of monitoring them will be set out in a future AMR.

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Air	1. Reduce air pollution	Pollutant levels at key locations in the borough	Kent Air online database
Biodiversity	2. Protect and enhance biodiversity and the natural environment	<p>Number of developments generating adverse effects on sites recognised for biodiversity value (including local sites as well as Sites of Special Scientific Interest (SSSIs))</p> <p>Number of developments generating biodiversity enhancement including GI</p> <p>Deterioration in condition of SSSIs.</p> <p>Reduction in percentage cover of sites designated for nature conservation</p> <p>Biodiversity units lost or gained as a result of major</p>	TWBC/ Natural England/TWBC/ KMBRC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
		development	
Business Growth	3.Encourage business growth and competitiveness	Floor space targets for new Local Plan.	TWBC
Climate Change & Energy	4.Reduce carbon footprint and adapt to predicted changes	Attainment of carbon reduction targets Grading of Energy Performance Certificates. Number of EV car registrations. Number of renewable energy schemes.	TWBC/KCC
Deprivation	5.Reduce poverty and assist with regeneration	3 yearly Indices of Multiple Deprivation (IMD) Report.	KCC Research and Intelligence Monthly Bulletin (deprivation and poverty)
Education	6.Improve educational attainment and enhance the skills base	Ratio of applicants to school places.	KCC Education Department
Employment	7.Facilitate and support employment opportunities	Monthly unemployment records.	KCC Research and Intelligence Monthly Bulletin (economy and employment)
Equality	8.Increase social mobility and inclusion	Number of accessible new homes	TWBC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Health	9.Improve health and wellbeing, and reduce health inequalities	3 yearly Indices of Multiple Deprivation (IMD) Report.	KCC Research and Intelligence Monthly Bulletin (public health)
Heritage	10.Preserve and enhance historical and cultural heritage assets	Number of designated heritage assets in the Borough. Number of Listed Buildings 'At Risk'.	TWBC
Housing	11.Provide sufficient housing to meet identified needs	5 year Housing Land Supply Housing Delivery Test	TWBC
Land use	12.Protect soils, and reuse previously developed land and buildings	MGB Allocation Summary Brownfield register	TWBC
Landscape	13.Protect and enhance landscape and townscape	Majors permitted per year in the AONB. Monitoring of the AONB Management Plan.	TWBC
Noise	14.Reduce noise pollution	Tranquillity maps Noise maps	CPRE DEFRA
Resources	15.Reduce the impact of resource consumption	% of relevant applications where demolition is avoided % of relevant applications where materials are sourced responsibly Safeguarding of mineral and waste assets	TWBC/KCC
Services and facilities	16.Improve access to and range of key services and facilities	Postcodes with superfast broadband. Distance from development to services and facilities	TWBC
Travel	17.Improve travel choice and reduce the need to travel by private vehicle	% of relevant applications where a Travel Plan is secured.	TWBC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Waste	18.Reduce waste generation and disposal	Household waste (kg/person) Household waste diverted from landfill (%)	TWBC Contracts Team
Water	19.Manage flood risk and conserve, protect and enhance water resources	Various metrics within 'State of Water in Kent' report. Water Use calculations	EA/TWBC