



Tunbridge Wells Borough Local Plan

**Sustainability Appraisal
of the
Draft Local Plan**

for Regulation 18 Consultation

September 2019

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	Link
June 2016	Sustainability Appraisal Scoping Report Consultation Draft	Issue for stand alone consultation	Not published
October 2016	Sustainability Appraisal Scoping Report Final Report	Updated following consultation with statutory bodies and other interested parties, and consideration of new studies	http://www.tunbridge.wells.gov.uk/residents/planning/planning-policy/new-local-plan

Sustainability Appraisal (Stage B)

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	Was published for consultation for the period from 2 May to 12 June 2017
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.	http://www.tunbridge.wells.gov.uk/residents/planning/planning-policy/new-local-plan
July 2019	Sustainability Appraisal of the Draft Local Plan Consultation Draft	Issue for consultation alongside Draft Local Plan Report	This report

Non-Technical Summary

To make meaningful progress towards a more sustainable way of living, it is essential that Local Plans are developed with a detailed consideration of sustainability issues from the outset. This is the purpose of a Sustainability Appraisal (SA).

This report summarises how sustainability has been considered during the process of preparing a Draft Local Plan for the borough of Tunbridge Wells.

The process is a legal requirement under the Planning and Compulsory Purchase Act 2004 and has been completed using a framework methodology that was agreed with Natural England, the Environment Agency and Historic England. The framework is explained in detail in Chapter 4. It was informed by a comprehensive review of policies and issues pertinent to the borough that culminated in the formation of 19 sustainability objectives covering the economic, environmental and social themes that are integral to sustainable development.

The purpose of developing this framework was to create a consistent and robust test that would determine the degree to which the 19 sustainability objectives were supported by all the various elements of the Draft Local Plan, namely:

- the ten strategic objectives
- the ten strategic policies including the formation of the spatial development strategy;
- the sites proposed for allocation; and,
- the development management policies.

Wherever possible, reasonable alternatives to these elements were also tested. As a whole, this process enabled mitigation measures to be recommended so that the beneficial effects of the Draft Local Plan could be maximised, and any adverse effects could be minimised.

This process is summarised below in four steps and should be reviewed alongside both the SA Scoping Report and Interim SA for Issues and Options stage which were prepared to support earlier stages in the formation of the draft Local Plan¹.

(1) Testing the Local Plan objectives against the Sustainability Appraisal framework

A simple compatibility test was undertaken to determine how well the ten draft strategic objectives of the emerging Local Plan matched the 19 sustainability objectives previously determined as appropriate for this borough (see SA Scoping Report).

The key findings from this test are described in Chapter 5. In summary, it was found that the Strategic Objectives were largely in support of all the SA objectives. The Strategic Objectives address critical environmental issues such as climate change explicitly, provide for sustainable travel modes and protection of sensitive assets such as the Area of Outstanding Natural Beauty (AONB), and address fundamental social and economic issues such as meeting housing and economic needs and improving infrastructure.

All Strategic Objectives were compatible with multiple Sustainability Objectives. However, some incompatibility was predicted for the Strategic Objectives of Housing and Garden

¹ <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>

Settlements. This was because it would not be possible to find land for a large number of new dwellings without incurring some environmental conflict. The relationship between the balance of the economic, social and environmental priorities is a fundamental theme running through the SA.

(2) Developing the Local Plan options including reasonable alternatives and evaluating the likely significant effects

Reasonable alternative options were developed for the following elements of the Draft Local Plan:

- i. the formation of the spatial development strategy (STR 1);
- ii. the nine additional strategic policies (STR 2 – 10)
- iii. the sites proposed for allocation; and,
- iv. the development management policies

A consideration of each of these elements is summarised below.

i. The Spatial Development Strategy

The consideration of the options for growth was first made at the Local Plan 'Issues and Options' stage when the following six potential growth options were considered:

- Growth Strategy 1 – growth focussed largely on urban areas
- Growth Strategy 2 – growth focussed largely on urban areas plus some larger villages
- Growth Strategy 3 – growth distributed proportionally across all existing settlements
- Growth Strategy 4 – growth focussed on the A21 corridor near RTW and Pembury
- Growth Strategy 5 – growth within a new, free-standing settlement

To allow a detailed comparison across the options, each growth option was scored for its contribution towards sustainability. To do this, scores were chosen for each of the 19 sustainability appraisal objectives from a range of very negative to very positive. Where significant effects could not be determined easily, an unknown or mixed score was applied.

The conclusion of this process was that an approach combining the most sustainable elements of growth strategy options 1 – 5 would be appropriate for maximising beneficial effects and minimising adverse effects. Following this, two further alternative growth strategy options were identified. Firstly, an option in which the borough took on the unmet housing need of neighbouring district, Sevenoaks, and, secondly, an option in which growth was distributed more widely across rural settlements, notably through the growth of small hamlets and around farmsteads. The scoring exercise was thus repeated for these new options.

In the light of all the SA findings, together with the findings of further work, a preferred development strategy was produced and then scored using the same SA method. The preferred development strategy embraces the creation of a new garden settlement, together with a major urban extension based on garden settlement principles. Both of these concepts would involve some loss of Green Belt land, it being found unreasonable for such large growth to occur in the AONB. However, with a view to meet housing needs, the strategy also seeks, and finds scope for, growth within the AONB, being spread across a number of settlements, having first maximised potential outside the AONB. The key findings of this process were that significant beneficial effects were expected for most economic and social sustainability objectives. The environmental objectives were found to produce either highly

mixed, neutral or negative scores essentially reflecting the increased pressures that a significant number of new dwellings would put upon sensitive environmental features such as landscape and heritage.

Because the requirement for a new garden settlement and large urban expansion were fundamental to the preferred strategy, the SA also considered alternative locations and scales to these aspects of the final growth strategy. The findings of this process were that Tudeley village was the only reasonable location for a new settlement and that a scale limited by the flood risk to the north and the AONB and Green Belt to the south would be most preferred. This scale amounts to approximately 2,500 – 2,800 new dwellings.

For the urban extension, the findings were that Paddock Wood was the only reasonable location for an extension and that a scale set away from the constraints in the south (ancient woodland and AONB), but with land take in the Green Belt to the west of Paddock Wood, would provide a suitable scale of extension with benefits for the economic, environmental and social elements of sustainability.

Full details are contained within Chapter 6 of this report.

ii. Strategic Policies STR 2 – STR 10

Options for the remaining strategic policies (Policies STR 2 – 10) were determined by considering how well each of the strategic policies contributed to the 19 sustainability objectives, in comparison to alternatives in which the proposed Strategic Policies were not implemented. The alternatives were different for each policy and generally took the form of either a 'no policy' option where the borough relied on existing national policy only, or the implementation of a different type of policy. For reference purposes the policies are listed below:

- STR 2 – Sustainable Development
- STR 3 – Master planning
- STR 4 – Green Belt
- STR 5 – Infrastructure
- STR 6 – Transport
- STR 7 – Place shaping
- STR 8 – Environment
- STR 9 – Neighbourhood Plans
- STR10 – Limits to Built Development

For all Strategic Policies, the alternative (where applicable) was found to be less favourable.

Full details are contained within Chapter 7 of this report.

iii. Sites proposed for allocation

The consideration of which sites should be assessed by the SA in order to develop reasonable alternatives was undertaken using a similar filtering methodology to the Strategic Housing and Economic Land Availability Assessment². For example, sites that were poorly related to existing settlements or had significant environmental concerns were not deemed to be reasonable alternatives. This filtering process resulted in a list of approximately 300

² <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/evidence-base>

sites for the SA to assess.

Once SA assessments were completed, sites were grouped into parishes (or settlements for Royal Tunbridge Wells and Southborough) and a cumulative impact assessment was undertaken for each parish or settlement location.

The findings of this process were then used to perform an overall SA assessment for the borough i.e. a cumulative assessment of the SAs for all parishes and settlements. This assessment is how the findings for STR 1 were derived (see section (i) above). As previously explained, the key findings of this process were that significant beneficial effects were expected for most economic and social sustainability objectives. The environmental objectives were found to produce either highly mixed, neutral or negative scores essentially reflecting the increased pressures that a significant number of new dwellings would put upon sensitive environmental features such as landscape and heritage.

Full details are contained within Chapter 8 of this report.

iv. Development Management policies

Finally, a range of Development Management policies were developed for the following themes:

- Environment and Design
- Natural Environment
- Air, Water, Noise and Land
- Housing
- Employment
- Town, Rural Service, Neighbourhood and Village Centres
- Transport and Parking
- Open Space, Sport and Recreation

Similar to the alternatives for the strategic policies, the alternatives developed for development management policies took the form of options where no policy was implemented and the Council relies on national planning policy only, or a policy with a different emphasis or scale.

The key findings from this process were that the Development Management policies all make a positive contribution towards sustainability and that the proposed policies are preferable to the alternatives that were considered.

Full details are contained within Chapter 9 of this report.

(3) Considering ways of mitigating adverse effects and maximising beneficial effects

Numerous recommendations for mitigation and positive enhancements were made during the development of each element of the Draft Local Plan. These ranged from specific mitigation measures such as the protection of woodland, to a change in wording or emphasis to better meet the goals of sustainable development.

Full details of the recommendations made are found in Appendix B.

(4) Proposing measures to monitor the significant effects of implementing the Local Plan

Potential measures for monitoring the significant effects of implementing the Draft Local Plan are listed for each of the 19 sustainability objectives in Chapter 11. They include utilising existing monitoring networks such as that for air quality and regular review of publications that Kent County Council produce such as the Research and Intelligence Monthly Bulletin.

Contents

Non-Technical Summary	1
1 Introduction	12
1.1 Local Plan background	12
1.2 Sustainability Appraisal Background	12
1.3 Purpose of this Report.....	13
2 Consultation.....	15
2.1 Overview.....	15
2.2 Invitation to comment	15
3 Legal Compliance	16
3.1 The SEA Directive	16
3.2 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010	19
4 Methodology	20
4.1 Updates to Baseline Data.....	20
4.2 Updates to Plans, Policies and Programmes	22
4.3 Sustainability Objectives and Scoring Method.....	26
5 Compatibility Testing of Strategic Objectives.....	30
5.1 Background	30
5.2 Method.....	30
5.3 Results.....	32
6 SA of the Spatial Development Strategy	35
6.1 Background and Method	35
6.2 Results.....	39
Garden Settlement Development Scale	43
Urban Extension Development Scale.....	46
7 SA of the Strategic Policies	50
7.1 Background and Method	50
7.2 Results.....	51
8 SA of the Potential Development Sites	55
8.1 Background and Method	55
8.2 Results.....	57
Royal Tunbridge Wells	58
Southborough.....	62

Capel (including Tudeley Village)	65
Paddock Wood	68
Cranbrook and Sissinghurst	70
Hawkhurst	74
Benenden	77
Bidborough	79
Brenchley and Matfield	80
Frittenden	82
Goudhurst.....	84
Horsmonden.....	87
Lamberhurst	89
Pembury	92
Rusthall	95
Sandhurst.....	97
Speldhurst	99
9 SA of Development Management Policies	102
9.1 Background and Method	102
9.2 Results and Mitigation	105
Environment and Design	106
Natural Environment.....	109
Air, Water, Noise and Land	112
Housing	115
Employment	121
Town, Rural Service, Neighbourhood and Village Centres	123
Transport and Parking.....	124
Open Space, Sport and Recreation	127
9.3 Findings	127
10 Conclusion	129
11 Monitoring	149
11.1 Need for Monitoring	149
11.2 Proposed Measures for Monitoring.....	149
12 Appendices	152
Appendix A - Decision-aiding questions used for scoring SA objectives.....	153
Appendix B - Mitigation Measures and Recommendations.....	159
Appendix C - Cumulative Impact Assessment Methodology.....	161
Appendix D - Cumulative Impact Assessment for Green Belt sites.....	162

Appendix E - Royal Tunbridge Wells.....	163
Appendix F - Southborough	175
Appendix G - Capel	177
Appendix H - Paddock Wood	180
Appendix I - Cranbrook and Sissinghurst.....	181
Appendix J - Hawkhurst	188
Appendix K - Benenden	195
Appendix L - Brenchley and Matfield.....	197
Appendix M - Frittenden	202
Appendix N - Goudhurst.....	203
Appendix O - Horsmonden.....	204
Appendix P - Lamberhurst.....	207
Appendix Q - Pembury	209
Appendix R - Rusthall.....	214
Appendix S - Sandhurst	215
Appendix T - Speldhurst.....	217

List of Tables

Table 1. SEA Regulations checklist	16
Table 2. New or upcoming relevant evidence studies and implications for the SA	20
Table 3. Additional key national plans, policies and programmes	23
Table 4. Additional key regional plans, policies and programmes	24
Table 5. Updates to key local plans, policies and programmes	25
Table 6. Sustainability Objectives for Tunbridge Wells Borough	26
Table 7. Minor alterations to scoring method during Stage B	28
Table 8. Compatibility testing of Local Plan objectives with SA objectives.	32
Table 9. Number of sustainability objectives that are compatible with Local Plan objectives.	33
Table 10. Number of Local Plan Objectives that are compatible with sustainability objectives.	33
Table 11. Growth Strategy Options considered by the Issues and Options SA	35
Table 12. Further growth strategy options for the new Local Plan considered by the SA	36
Table 13. Garden settlement and urban extension location options considered by the SA ..	37
Table 14. SA findings for the remaining alternative growth strategies.	39
Table 15. SA of Draft Local Plan spatial distribution strategy.....	42
Table 16. SA scores for the two alternative scales of growth of a garden settlement in Capel Parish.....	45
Table 17. SA scores for the four urban extension growth options at Paddock Wood	48
Table 18. SA findings for the Strategic Policies (part 1 of 2)	52
Table 19. SA findings for the Strategic Policies (part 2 of 2)	53
Table 20. List of reasonable alternative sites in Royal Tunbridge Wells	58
Table 21. SA scores for allocated sites in Royal Tunbridge Wells.	61
Table 22. List of reasonable alternative sites in Southborough.....	62
Table 23. SA scores for allocated sites in Southborough.....	64
Table 24. List of reasonable alternative sites in Capel Parish.....	65
Table 25. SA scores for allocated sites in Capel Parish.....	67
Table 26. List of reasonable alternative sites in Paddock Wood Parish.....	68
Table 27. SA scores for allocated sites in Paddock Wood Parish.....	70
Table 28. List of reasonable alternative sites in Cranbrook and Sissinghurst Parish	70
Table 29. SA scores for allocated sites in Cranbrook and Sissinghurst Parish	73
Table 30. List of reasonable alternative sites in Hawkhurst Parish	74
Table 31. SA scores for allocated sites in Hawkhurst Parish	76
Table 32. List of reasonable alternative sites in Benenden Parish.....	77
Table 33. SA scores for allocated sites in Benenden Parish.....	79
Table 34. List of reasonable alternative sites in Brenchley and Matfield Parish.....	80
Table 35. SA for allocated sites in Brenchley and Matfield Parish	82
Table 36. List of reasonable alternative sites in Frittenden Parish	82
Table 37. List of reasonable alternative sites in Goudhurst Parish	84
Table 38. SA scores for allocated sites in Goudhurst Parish	86
Table 39. List of reasonable alternative sites in Horsmonden Parish.....	87
Table 40. SA scores for allocated sites in Horsmonden Parish	89
Table 41. List of reasonable alternative sites in Lamberhurst Parish	89
Table 42. SA scores for allocated sites in Lamberhurst Parish	91

Table 43. List of reasonable alternative sites in Pembury Parish	92
Table 44. SA scores for allocated sites in Pembury Parish	94
Table 45. List of reasonable alternative sites in Rusthall Parish.....	95
Table 46. List of reasonable alternative sites in Sandhurst Parish	97
Table 47. SA scores for allocated sites in Sandhurst Parish	99
Table 48. List of reasonable alternative sites in Speldhurst Parish.....	99
Table 49. SA scores for allocated sites in Speldhurst Parish.....	101
Table 50. List of Development Management policies	102
Table 51. SA scores for Environment and Design policies (part 1 of 3).....	106
Table 52. SA scores for Environment and Design policies (part 2 of 3).....	107
Table 53. SA scores for Environment and Design policies (part 3 of 3).....	108
Table 54. SA scores for Natural Environment policies (part 1 of 3)	109
Table 55. SA scores for Natural Environment policies (part 2 of 3)	110
Table 56. SA scores for Natural Environment policies (part 3 of 3)	111
Table 57. SA scores for Air, Water, Noise and Land policies (part 1 of 3)	112
Table 58. SA scores for Air, Water, Noise and Land policies (part 2 of 3)	113
Table 59. SA scores for Air, Water, Noise and Land policies (part 3 of 3)	114
Table 60. SA scores for housing policies (part 1 of 6)	115
Table 61. SA scores for housing policies (part 2 of 6)	116
Table 62. SA scores for housing policies (part 3 of 6)	117
Table 63. SA scores for housing policies (part 4 of 6)	118
Table 64. SA scores for housing policies (part 5 of 6)	119
Table 65. SA scores for housing policies (part 6 of 6)	120
Table 66. SA scores for employment policies (part 1 of 2)	121
Table 67. SA scores for employment policies (part 2 of 2)	122
Table 68. SA scores for town, rural service, neighbourhood and village centres policies ...	123
Table 69. SA scores for transport and parking policies (part 1 of 3)	124
Table 70. SA scores for transport and parking policies (part 2 of 3)	125
Table 71. SA scores for transport and parking policies (part 3 of 3)	126
Table 72. SA scores for Open Space, Sport and Recreation policies.....	127
Table 73. Complete SA of all elements of the Draft Local Plan	129
Table 74. Impact of overall Draft Local Plan on each Sustainability Appraisal objective	130
Table 75. Monitoring Indicators to determine whether sustainability aims are being delivered.	149
Table 76. Decision-aiding questions used for scoring sustainability objectives	153
Table 77. SA scores for allocated sites in the Green Belt	162

List of Figures

Figure 1. Key stages of Local Plan preparation and the relationship with the SA process...	13
Figure 2. The five sub-processes that form Stage B of the Sustainability Appraisal	14
Figure 3. Eight point scale of impact used to determine Sustainability Appraisal scores	27
Figure 4. Strategic Objectives of the new Local Plan.....	31
Figure 5. Map of garden settlement options within the Borough	37
Figure 6. Map of growth options 1 (orange) and 2 (purple) for a garden settlement in Capel Parish.....	44
Figure 7. Map of urban extension options for Paddock Wood	47
Figure 8. Map of reasonable alternative sites within Royal Tunbridge Wells	60
Figure 9. Map of reasonable alternative sites within Southborough.....	63
Figure 10. Map of reasonable alternative sites within Capel Parish.....	66
Figure 11. Map of reasonable alternative sites within Paddock Wood Parish.....	69
Figure 12. Map of reasonable alternative sites within Cranbrook and Sissinghurst Parish ...	72
Figure 13. Map of reasonable alternative sites within Hawkhurst Parish.	75
Figure 14. Map of reasonable alternative sites within Benenden Parish.....	78
Figure 15. Map of reasonable alternative sites within Brenchley and Matfield Parish.....	81
Figure 16. Map of reasonable alternative sites within Frittenden Parish.	83
Figure 17. Map of reasonable alternative sites within Goudhurst Parish.	85
Figure 18. Map of reasonable alternative sites within Horsmonden Parish.....	88
Figure 19. Map of reasonable alternative sites within Lamberhurst Parish	90
Figure 20. Map of reasonable alternative sites within Pembury Parish.....	93
Figure 21. Map of reasonable alternative sites within Rusthall Parish	96
Figure 22. Map of reasonable alternative sites within Sandhurst Parish.....	98
Figure 23. Map of reasonable alternative sites within Speldhurst Parish	100

1 Introduction

1.1 Local Plan background

- 1.1.1 The new Local Plan prepared by Tunbridge Wells Borough Council (TWBC) sets out the policies and plans to guide the future development of the borough in the period 2016 - 2036. It identifies the scale of development and also the key locations that will be used to meet this need.
- 1.1.2 The new Local Plan provides:
- a spatial vision for the borough and strategic objectives to achieve that vision
 - a development strategy to provide:
 - a framework for the allocation of sites for specific uses (for example, housing and business use)
 - the context for designating areas where specific policies will apply, either encouraging development to meet economic and/or social objectives or constraining development in the interests of environmental protection
 - Site-specific allocations and policies for development of identified sites including urban extensions and a garden settlement
 - Development Management policies to shape the form of development at application stage both for sites allocated in the Local Plan and other sites that come forward during the plan period
- 1.1.3 The main objectives of the new Local Plan are to meet development needs, protect and enhance the environment, deliver appropriate and sufficient infrastructure, provide high quality housing, provide for economic growth, ensure adequate leisure and recreational facilities, deliver sustainable development, and deliver adequate transport and parking capacity.
- 1.1.4 The new Local Plan will replace the following policy documents in current use:
- Tunbridge Wells Borough local Plan saved policies (June 2006)
 - Tunbridge Wells Borough Core Strategy DPD (June 2010)
 - Tunbridge Wells Borough Site Allocations Local Plan (July 2016)
- 1.1.5 The new Local Plan has sustainability implications for the entire borough. The economic, environmental and social characteristics of the borough are described in the Sustainability Appraisal Scoping Report and also the Draft Local Plan document published for consultation alongside this document³.

1.2 Sustainability Appraisal Background

- 1.2.1 A Sustainability Appraisal (SA) 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

³ <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>

sustainable development.

- 1.2.2 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).

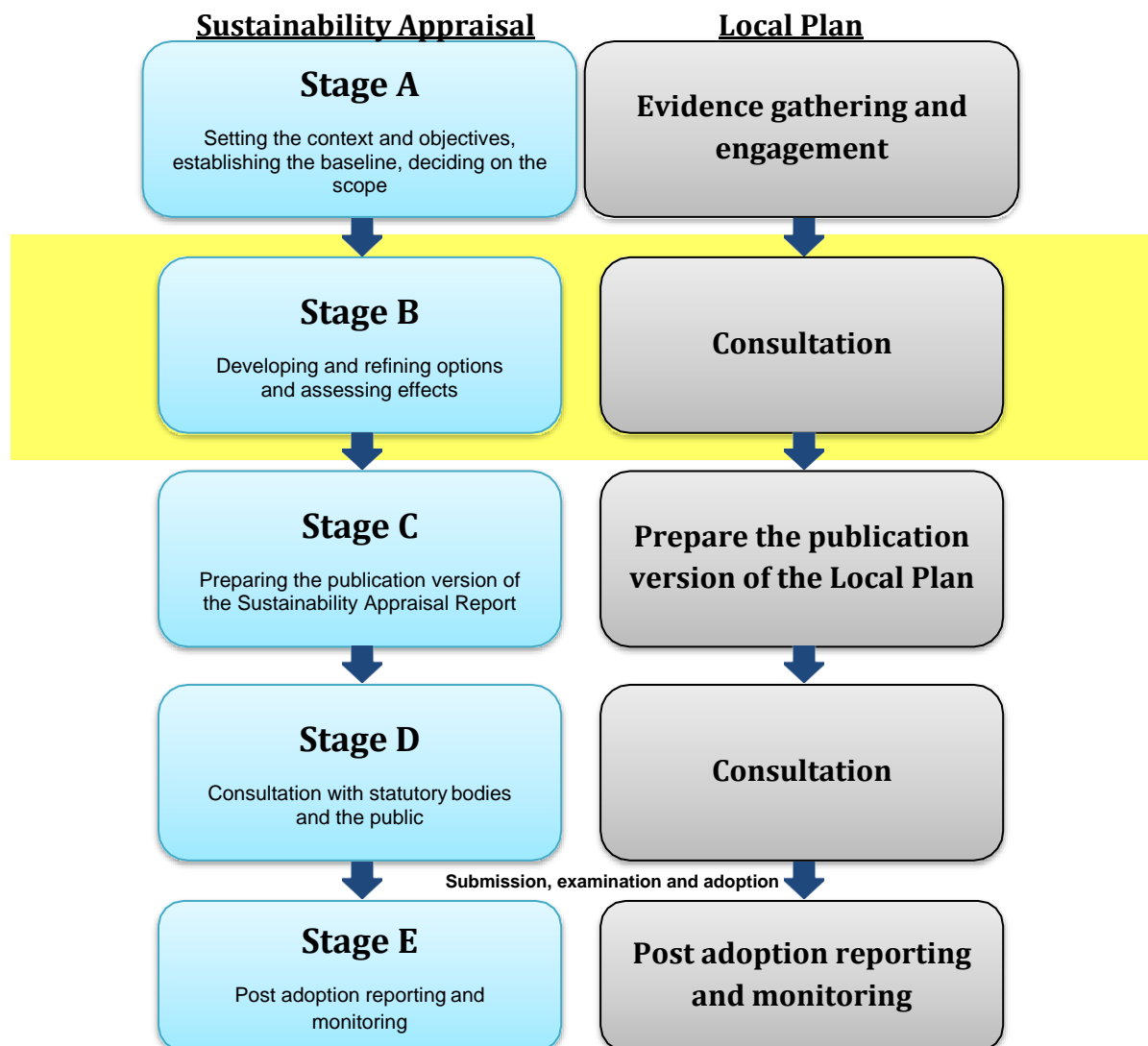


Figure 1. Key stages of Local Plan preparation and the relationship with the SA process. Adapted from Planning Practice Guidance Reference 11-013-20140306. Yellow highlight indicates current stage of work.

1.3 Purpose of this Report

- 1.3.1 Stage A of the sustainability appraisal process was undertaken in 2015-16 and resulted in the production of a Scoping Report that was consulted on in June 2016. The report was then updated to take into account consultees' comments and a final version prepared in October 2016. The Stage A Scoping Report should be referred to for a description of the original baseline, relevant plans, policies and programmes and the justification for the sustainability objectives that are being implemented in this report. Updates to these descriptions are also provided in Chapter 4 of this report.

- 1.3.2 The Stage B of the sustainability appraisal process began in 2017 and was summarised initially with the production of the Issues and Options Stage Sustainability Appraisal⁴. This report only applied the Stage B process to the draft growth strategy options and draft plan objectives as outlined in the Local Plan Issues and Options document.
- 1.3.3 A formal report is not a requirement for Stage B (see Figure 1). However, a report for consultation was prepared nevertheless as it was felt to be a useful interim presentation of the application of the SA scoring methodology and a good opportunity for relevant organisations to provide opinions following the initial scoping stage and prior to the scoring being extensively applied to sites and policies.
- 1.3.4 As options were continually developed and refined, a further iteration of the Stage B process was applied to the refined objectives, allocation of sites and policies for development management (including reasonable alternatives). The results of this exercise are summarised with the production of this Stage B report. As work continued on Stage B, the process was divided into five sub-processes (see Figure 2).

B1	Test the Local Plan objectives against the sustainability appraisal framework
B2	Develop the Local Plan options including reasonable alternatives
B3	Evaluate the likely effects of the Local Plan alternatives
B4	Consider ways of mitigating adverse effects and maximising beneficial effects
B5	Propose measures to monitor the significant effects of implementing the Local Plan

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

⁴ <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>

2 Consultation

2.1 Overview

- 2.1.1 Views from statutory consultees and other interested parties have been sought throughout the Sustainability Appraisal process.
- 2.1.2 All comments received, the council's response and any subsequent changes made to the SA process are included in Appendix H of the Scoping Report and Appendix C of the Interim SA Report⁵.
- 2.1.3 The three statutory environmental consultees: Natural England, Historic England and the Environment Agency have provided comments on the SA work to date, including the 19 objectives identified. No fundamental concerns about the SA process or objectives have been raised.

2.2 Invitation to comment

- 2.2.1 As with the other stages of SA work, this Sustainability Appraisal has been sent to the three statutory environmental consultees.
- 2.2.2 In addition, all residents, organisations and authorities on the Borough Council's database have been invited to comment. This includes but is not limited to:
 - All town and parish councils in the borough
 - All adjoining local planning authorities
 - Campaign to Protect Rural England (as per request by Town Forum at Scoping Stage)
 - 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 Education Department
 - Kent County Council Heritage Team
 - Kent County Council Sustainable Urban Drainage Team
 - Kent High Weald Partnership
 - Kent Local Nature Partnership (subject to pre assessment check)
 - Kent Reptile and Amphibian Group
 - Kent Wildlife Trust
 - Kent Youth Sport
 - Royal Society for the Protection of Birds
 - Sevenoaks District Council
 - Southern Water (as per request by KCC at scoping stage)
 - South East Water
 - Upper Medway Internal Drainage Board
 - West Kent Primary Care Trust
 - Woodland Trust

⁵ <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>

3 Legal Compliance

3.1 The SEA Directive

- 3.1.1 Table 1 below shows how the Sustainability Appraisal process associated with the production of the new Local Plan incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the “Strategic Environmental Assessment Regulations”), which implement the requirements of the European Directive 2001/42/EC (the “Strategic Environmental Assessment Directive”) on the assessment of the effects of certain plans and programmes on the environment. The Planning and Compulsory Purchase Act 2004 requires that a Sustainability Appraisal (SA) is used to implement the legal requirements of the SEA regulations (whilst also considering economic and social impacts).
- 3.1.2 In the interest of avoiding repetition, the final Sustainability Appraisal report (this document) does not contain information recorded elsewhere. In this report, references and updates to other Sustainability Appraisal reports are made where necessary.

Table 1. SEA Regulations checklist

SEA Regulations Requirements	Relevant Report
Preparation of environmental report (Reg 12) including:	Scoping Report (2016) Issues and Options Sustainability Appraisal (2017) Sustainability Appraisal for the Draft Local Plan (this report)
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Issues and Options Sustainability Appraisal (2017) Section 1.1 Sustainability Appraisal for the Draft Local Plan (this report) Chapters 1 and 4.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Scoping Report (2016) Section 3.4 Issues and Options Sustainability Appraisal (2017) Chapter 4 Sustainability Appraisal for the Draft Local Plan (this report) Chapters 1, 3 and 4.

SEA Regulations Requirements	Relevant Report
<p>The environment characteristics of areas likely to be significantly affected</p>	<p>Scoping Report (2016) Appendix E</p> <p>Issues and Options Sustainability Appraisal (2017) Chapters 4 and 5.</p> <p>Sustainability Appraisal for the Draft Local Plan (this report) Chapters 5, 6, 7 and 8.</p>
<p>Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).</p>	<p>Scoping Report (2016) Section 4.4 and Appendix E</p> <p>Sustainability Appraisal for the Draft Local Plan (this report) Chapter 3.</p>
<p>The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>	<p>Scoping Report (2016) Chapter 2</p> <p>Sustainability Appraisal for the Draft Local Plan (this report) Chapter 3 and 4.</p>
<p>The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.</p>	<p>Issues and Options Sustainability Appraisal (2017) Chapters 4 and 5</p> <p>Sustainability Appraisal for the Draft Local Plan (this report) Chapters 5, 6, 7, 8 and 9.</p>
<p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p>Issues and Options Sustainability Appraisal (2017) Chapter 9</p> <p>Sustainability Appraisal for the Draft Local Plan (this report) Appendix B</p>
<p>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Sustainability Appraisal for the Draft Local Plan (this report) Chapters 4, 5, 6, 7, 8 and 9.</p>
<p>A description of measures envisaged concerning monitoring in accordance with regulation 17.</p>	<p>Issues and Options Sustainability Appraisal (2017) Chapter 11</p> <p>Sustainability Appraisal for the Draft Local Plan (this report) Chapter 11</p>

SEA Regulations Requirements	Relevant Report
<p>A non-technical summary of the information provided under the above headings.</p>	<p>Scoping Report (2016) Executive Summary</p> <p>Issues and Options Sustainability Appraisal (2017) Non-Technical Summary</p> <p>Sustainability Appraisal for the Draft Local Plan Non-Technical Summary (page 1)</p>
<p>Consultation Procedures (Reg 13)</p> <p>As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.</p>	<p>Scoping Report (2016) Chapter 6</p> <p>Issues and Options Sustainability Appraisal (2017) Chapter 7</p> <p>Sustainability Appraisal for the Draft Local Plan (this report) Chapter 2</p>
<p>Information as to adoption of plan or programme (Reg 16)</p> <p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> - the plan or programme adopted - the environmental report - a statement summarising: <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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. 	<p>Adoption statement (future report).</p> <p>To be prepared when the Local Plan has completed its Reg 19 stage.</p>
<p>Monitoring of implementation of plans or programmes (Reg 17)</p> <p>Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>Issues and Options Sustainability Appraisal (2017) Chapter 11</p> <p>Sustainability Appraisal for the Draft Local Plan (this report) Chapter 11</p>

3.2 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010

- 3.2.1 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010, collectively referred to in this report as the Habitats Regulations, implements the Habitats Directive in England & Wales. Under the Habitats Regulations any plan or project likely to have a significant adverse effect upon the integrity of a 'European site' must be subject to an appropriate assessment to determine the implications for the designated site in view of its conservation objectives. 'European sites' are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within a European context. They consist of Special Areas of Conservation (SAC) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora and Special Protection Areas (SPA) designated under Council Directive 2009/147/EC on the Conservation of Wild Birds.
- 3.2.2 Under the Habitats Regulations the Council, as the competent body, must determine if the Local Plan is likely to have a significant effect on a biodiversity site of European site, either alone or in combination with other plans or projects. If significant effects are predicted, then an appropriate assessment of the implications for the site in view of its conservation objectives must be undertaken.
- 3.2.3 There are no internationally designated sites within the Borough. The nearest site is the Ashdown Forest (both a SAC and SPA) which is located in Wealden District. In accordance with the Habitats Regulations, a report which includes an Appropriate Assessment, has been undertaken which looks at the potential effects of the policies contained in the Local Plan on this European site. In this regard, all of the allocations and policies in the Plan were assessed for potential conflicts with this European site.
- 3.2.4 Following detailed analysis, the Council has concluded that the Draft Local Plan will not have a significant adverse effect upon the Ashdown Forest (either alone or in combination with other plans).
- 3.2.5 As required by National Planning Policy Guidance, the findings of the Habitats Regulation Assessment have been considered in the preparation of this Sustainability Appraisal.

4 Methodology

4.1 Updates to Baseline Data

- 4.1.1 The Sustainability Appraisal is a dynamic process that is continuously adapted or updated as more data or evidence becomes available.
- 4.1.2 Table 2 below provides a list of additional relevant evidence studies that became available for consideration during Stage B following publication of the Issues and Options Sustainability Appraisal in July 2017. The implication of these studies for the baseline data underlying the Sustainability Appraisal is discussed.

Table 2. New or upcoming relevant evidence studies and implications for the SA.

Evidence	Source	Completion Date	Overview	Implication for the SA
Green Belt Study (Stage 2)	External consultant commissioned by TWBC	July 2017	Assessment of land parcels not making a strong contribution to the purposes of the Green Belt.	The SA method or baseline data does not need updating but the information will help determine the overall score for the 'Land Use' objective.
Gypsy and Traveller Needs Assessment	External consultant commissioned by TWBC	Jan 2018	An accommodation assessment that identified a need for 32 additional pitches in the borough over the plan period. The need can be substantially met by expanding existing sites.	SA method or baseline data does not need updating.
Historic Landscape Characterisation	External consultant commissioned by TWBC and the AONB Unit	June 2017	Interpretation and mapping of the historic attributes of each parish.	No change to method or baseline data. Maps will be useful when deciding on scores for the 'Heritage' and 'Landscape' objectives of the SA.
Historic Environment Review	External consultant commissioned by TWBC	Jan 2018	Comprehensive review and assessment of heritage assets in the borough.	No change to method or baseline data. Information will be useful when deciding on scores for the 'Heritage' objective of the SA.
Housing Needs Survey	External consultant commissioned by TWBC	July 2018	Assessment of affordable housing needs, aspirations of households moving and needs for dwelling types.	The second decision-aiding question for the 'Housing' objective has been changed to remove the word 'downsizing'. This better encompasses the need for M4 (3) homes.

Evidence	Source	Completion Date	Overview	Implication for the SA
Infrastructure Development Plan	TWBC Policy Team	Summer 2019	Provides information on availability and need for important infrastructure across the borough e.g. schools, utilities	Findings considered during the SA process
Kent Primary Admissions Booklet	KCC	Up to 2019	Provides details on number of applications and offers in primary schools within the borough.	No change to method or baseline data. Information used to determine demand for school places over past 5 years.
Landscape Sensitivity Assessment (RTW, Paddock Wood, Horsmonden, Hawkhurst and Cranbrook)	External consultant commissioned by TWBC	Spring 2017 and July 2018	General assessment of the sensitive landscape surrounding and within key settlements including recommendations for mitigation.	The SA method or baseline data does not need updating but the information will help determine the overall score for the 'Landscape' objective and guide mitigation suggestions.
Landscape Character Assessment	External consultant commissioned by TWBC	Spring 2017	Assessment of character areas and types across the borough including detractors and enhancements.	The SA method or baseline data does not need updating but the information will help determine the overall score for the 'Landscape' objective and guide mitigation suggestions.
Needs Assessment relating to the Provision of Natural Greenspace in areas with Low Levels of Physical Activity	Report for the Kent Nature Partnership and KCC	Summer 2016	A detailed review of which location within the borough are meeting greenspace access standards.	The SA method or baseline data does not need updating but the information will help determine the overall score for the 'Health' and 'Equality' objectives.
Open Space, Sport and Recreation Study	External consultant commissioned by TWBC	Nov 2017 – Jun 2018	A group of studies that assess existing provision and give recommendations for the future.	The SA method does not need updating but the information will help determine the overall score for the 'Health' and 'Services and Facilities' objectives.
Retail and Leisure Study	External consultant commissioned by TWBC	Spring 2017	Assessment of existing provision and recommendations for the future.	The SA method does not need updating but the information will help determine the overall score for the 'Services and Facilities' objective.

Evidence	Source	Completion Date	Overview	Implication for the SA
Settlement Role and Function Study	Internal assessment by TWBC	Spring 2017	An assessment of infrastructure and services in each settlement.	The SA method does not need updating but the information will help determine the overall score for the 'Services and Facilities' and 'Travel' objectives.
Site of Special Scientific Interest (SSSI) Screening Report	TWBC Policy Team	Summer 2019	Review of allocated sites and their impact upon SSSIs	Information will be useful when deciding on scores for the 'Biodiversity' objective of the SA.
Strategic Flood Risk Assessment	External consultant commissioned by TWBC	Summer 2019	Provision of detailed flood information and mapping	Findings considered during preparation of the SA
Strategic Housing and Economic Land Availability Assessment (SHELAA)	TWBC Policy Team	Spring 2017 (interim study only)	Identification of land suitable for development within the borough.	The SA has informed this assessment. The SA method does not need updating.
Transport Study	External consultant commissioned by TWBC	Summer 2019	Consideration of traffic impacts of proposed Draft Local Plan	Findings considered during preparation of the SA
Viability Assessment	External consultants commissioned by TWBC	Summer 2019	Consideration of viability implications of Draft Local Plan	Findings considered during preparation of the SA
Water Efficiency Background Paper	TWBC Policy Team	May 2017	Assessment of water pressures in region and justification for adopting more stringent policy expectations.	SA method has been updated to reflect the high pressures of the region and lack of capacity to support current levels of new development. The final decision-aiding question for the 'Water' Objective has now been given a 'High' weighting (see Appendix A)

4.2 Updates to Plans, Policies and Programmes

- 4.2.1 The tables below provide a list of key national, regional and local plans, policies and programmes that became available for consideration since publication of the Scoping Report in 2016 or an update to a previously identified plan. There have

been no changes to international plans, policies and programmes in this time frame.

Table 3. Additional key national plans, policies and programmes

Title	Date	Purpose	Implication for SA
National Planning Policy Framework	2019	To set out government's planning policies and methods for application.	Includes expectation for net gains for biodiversity, more weight to ancient/veteran trees and an update to method for calculating housing needs.
National Infrastructure Delivery Plan 2016 - 2021	2016	Details how the government will support the delivery of key infrastructure projects and programmes.	As above.
National Planning Practice Guidance	Ongoing updates	Further detail and guidance on how planning policies detailed within the NPPF are to be interpreted. Updates to Brownfield Registers, Build to Rent, Climate Change, Historic Environment, Vitality of towns, Health and Wellbeing made since 2017.	No significant implication for Sustainability Appraisal.
Biodiversity 2020: A strategy for England's Wildlife and Ecosystem Services	2018	Detail on how international and EU commitments are being implemented in England.	No significant implication for Sustainability Appraisal.
DEFRA. A Green Future: Our 25 Year Plan to Improve the Environment	2018	Detail and targets for the next 25 years e.g. clean air, minimising waste.	No significant implication for Sustainability Appraisal.
The Housing and Planning Act	2016	Detail on Right to Buy, Pay to Stay, Starter Homes, Private rented sector etc.	No significant implication for Sustainability Appraisal.
DCLG White Paper - Fixing Our Broken Housing Market	2017	Plans to reform the housing market and boost supply of new homes.	No significant implication for Sustainability Appraisal.
TCPA. Planning for the Climate Challenge? Understanding the Performance of English Local Plans	2016	Guidance for including climate change related issues in local planning policy.	Guidance document that will help inform the scoring for the 'Climate Change' objective.

Title	Date	Purpose	Implication for SA
UK Disability Strategy, Equality Act and associated regulations currently being updated by DfCG&C, DfT, DfB and DWP.	2012	Created to help ensure compliance with UN Convention on the Rights of Disabled People by the end of 2025.	The decision-aiding questions for the 'equality' and 'housing' objectives have been updated to consider independently accessible facilities and housing. This reflects comments made following consultations of the Issues and Options SA (see paragraph 4.3.11).

Table 4. Additional key regional plans, policies and programmes

Title	Date	Purpose	Implication for SA
Kent Water for Sustainable Growth Study	2017	Assessment of water pressures in region (and at Borough level)	SA method has been updated to reflect the high pressures of the region and lack of capacity to support current levels of new development. The final decision-aiding question for the 'Water' Objective has now been given a 'High' weighting (see Appendix A)
Draft South East Water Resource Management Plan 2020 - 2080	Ongoing	An account of the challenges and opportunities over the next 60 years. Long term plan includes upgrade of Bewl Water WTW and improvements to distribution network to allow increase in abstraction. However, unlikely to come forward in the TWBC plan forward.	As above.
KCC Draft Minerals and Waste Local Plan	Consultation closed on 08/3/19	Sites at Moat Farm and Stone Castle, Five Oak Green are adjacent to the boundary with TWB.	Cross boundary effects will be considered by the SA.
Commissioning Plan for Education Provision in Kent 2016 - 2020	2016	Considers regional pressures for school places.	Method unchanged and will remain focussed on localised pressures.

Table 5. Updates to key local plans, policies and programmes

Title	Date	Purpose	Implication for SA
Neighbourhood Development Plans	At various stages throughout borough. The Hawkhurst NDP was "made" in March 2018.	Contain various policies offering landscape protection and guidance on development design, community infrastructure and travel.	No update needed. Hawkhurst NDP was screened for SEA and HRA and found not to have likely significant effects.
HRA for Draft Local Plan Reg 18 including Air Quality Impact Assessment	2019	Determines whether planned growth in the borough and beyond will cause likely significant effects on the Ashdown Forest Special Area of Conservation and Special Protection Area.	Finding will influence scoring method for biodiversity objective.
Wealden District Council New Local Plan (emerging)	Ongoing	Plan currently at examination. No significant allocations are proposed near the boundary with Tunbridge Wells Borough Council.	Cross boundary effects unlikely.
Ashford Borough Council New Local Plan	2019	Adopted in 2019. There are no allocations with the potential to cause adverse cross-boundary implications with Tunbridge Wells.	Cross boundary effects unlikely.
Maidstone Borough Council Local Plan Review	Ongoing	Existing Plan contains allocations in Marden, Headcorn and Staplehurst accounting for approximately 1500 new dwellings. Review likely to identify additional need. However, locations and spatial strategy currently unknown.	Potential cross boundary effects will be considered by the SA.
Tonbridge and Malling Borough Council New Local Plan (emerging)	Ongoing	Plan currently at examination. Contains allocations at or near Tonbridge for approximately 600 dwellings and 11ha of employment use.	Potential cross boundary effects will be considered by the SA.
Sevenoaks District Council New Local Plan (emerging)		Plan submitted for Examination in April 2019. The Plan does not meet the housing need for the District. No significant allocations are proposed near the boundary with Tunbridge Wells Borough Council.	Cross boundary effects unlikely.
Rother District Council Site Allocations Local Plan (emerging)	Ongoing	Plan currently at examination. No allocations close to border. However, NDP for Ticehurst and Hurst Green may have small impacts in the future if they are made.	Potential cross boundary effects of the NDPs will be considered by the SA where applicable.

4.3 Sustainability Objectives and Scoring Method

4.3.1 At scoping stage, 19 sustainability objectives were identified. These are summarised in Table 6.

Table 6. Sustainability Objectives for Tunbridge Wells Borough

Number	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
19	Water	Manage flood risk and conserve, protect and enhance water resources

4.3.2 Each objective above is underlain by various decision-aiding questions that were deemed relevant to the borough and important at local, regional, national or international scales. For example, scoring for the biodiversity objective was determined by the following three indicators:

- Sites of local biodiversity value included undesignated habitat
- The Ashdown Forest SAC and SPA
- Sites of Special Scientific Interest and associated risk zones

4.3.3 See Appendix A for a description of all decision-aiding questions for each objective.

4.3.4 To provide an indication of how well a policy, strategy or site contributes to each of sustainability objectives, a score was determined from an eight point scale of impact as shown in Figure 3.

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

Figure 3. Eight point scale of impact used to determine Sustainability Appraisal scores.

4.3.5 Where scores across the various decision-aiding questions varied, an overall score for each objective was determined using the following process:

- An equal number of positive, negative and neutral scores without weightings would score neutral overall or an appropriate combined score⁶
- Where the majority of scores are positive, negative or neutral and there are no weightings, a positive, negative or neutral score respectively is applied overall
- Where the majority of scores are positive, negative or neutral and there are weightings, the overall score would be skewed towards the highest weighting
- An equal number of positive and negative scores with weightings would be scored in favour of the highest weighting
- A large number of unknown or mixed scores would be scored as unknown/mixed score overall, especially if the unknown/mixed score is highly weighted.

4.3.6 Indicator weightings for decision-aiding questions can be seen in Appendix A. Higher weightings were given to issues that were legislatively driven, of critical importance to the borough and where finite assets were concerned.

4.3.7 Prior to assigning a score, consideration was given to the following impact criteria presented within Schedule 2 of the SEA Regulation as far as possible:

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

4.3.8 These effect 'characteristics' are described within the appraisal where appropriate. In all cases, professional judgement and the unique circumstances of each policy were used to apply final scores.

4.3.9 Every effort was made to predict effects accurately; however, in some cases this was inherently challenging given the high level nature of the alternatives under consideration. The ability to predict effects accurately was also limited by understanding of the baseline and (in particular) the future baseline. In light of this, an accompanying commentary is made for each element of the Draft Local Plan.

4.3.10 As scores were being considered, the Sustainability Appraisal process identified areas where policies could be made more sustainable and changes were made to the plan to accommodate these recommendations wherever possible. All the scores shown in this report are an assessment of the final policy wording within the Draft Local Plan. Unlike in the Issues and Options Sustainability Appraisal, realistic mitigation measures in line with the Draft Local Plan were assumed to be in place

⁶ For example, where an objective has only two key indicators which are scored as neutral and single positive, a combined score of 0 / + would be recorded.

when scores were applied.

- 4.3.11 Minor changes to this method have been made following updates to baseline data and consultation of the Issues and Options SA. These are summarised in Table 7 below and have been consistently applied across all the appraisal work described within this report.

Table 7. Minor alterations to scoring method during Stage B.

Sustainability Objective	Update to Scoring Method	Reasoning
Water	SA method has been updated such that the final decision-aiding question now has a 'High' weighting.	Baseline data has been updated during Stage B. This change better reflects the very high pressures in the region and lack of capacity to support current levels of new development that has been highlighted in the Kent Water for Sustainable Growth Study.
Housing	The second decision-aiding question for the 'Housing' objective has been changed to remove the word 'downsizing' and to include meeting the demand for 'independently accessible housing' as well as for older people.	Baseline data has been updated during Stage B. This change better encompasses the need for M4(3) homes which has been highlighted in the latest Housing Needs Survey. The changes also address concerns raised following consultation of the Issues and Options SA. Housing need calculations now have regard to the standard method.
Health	The decision-aiding questions for 'specialist health needs' has been incorporated into 'pockets of health deprivation'.	The issues were felt to be sufficiently similar so as not to warrant separate consideration. This decision was made following comments made during the consultation of the Issues and Options SA. It was suggested that the large number of decision-aiding questions for some objectives was skewing the scoring outcome. A full review of the objectives was undertaken to this effect and these two sub objectives were consolidated.
Equality	A new decision aiding question has now been included regarding promoting independent access to facilities for people with mobility, sensory and cognitive impairments.	This change reflects the expectation that compliance with the UN Convention on the Rights of Disabled People is expected by 2025 and addresses concerns raised following consultation of the Issues and Options SA.
Biodiversity	Consideration was given to the requirement for net gains for nature when scoring the biodiversity objective for borough-wide strategies.	This reflects the changes to the NPPF since the Issues and Options stage. A more precautionary approach was adopted for site level assessments, as the policy is in its infancy and it was not clear whether benefits would be delivered on or off site.

- 4.3.12 Once an overall score for each objective was determined, a scoring table was prepared that summarised the scores across all objectives and provided a written commentary on the overall impressions of the policy, strategy or site, including ways in which adverse effects have been mitigated and beneficial effects

maximised.

- 4.3.13 Because topics and objectives cannot be directly weighed against one another, readers are discouraged from 'adding up' positive or negative scores to give an overall score for a policy, strategy or site. For example, a very positive score for landscape is not neutralised by a very negative score for transport. Positive and negative impacts must be considered alongside the written commentary.
- 4.3.14 The scoring exercise was applied to the following four key elements of the Local Plan:
- Strategic policies
 - Potential development sites (both individually and cumulatively)
 - Development Management policies
 - Reasonable alternatives to all of the above
- 4.3.15 The strategic objectives of the plan were tested for compatibility against the sustainability objectives following the same method described in the Issues and Options Sustainability Appraisal.

5 Compatibility Testing of Strategic Objectives

5.1 Background

- 5.1.1 There are ten Strategic Objectives guiding the new Local Plan (updated from the eight that were originally presented in the Issues and Options report). These are shown in Figure 4 (with titles added for clarity).
- 5.1.2 The Strategic Objectives have been through much iteration since the Issues and Options stage. They have taken into account previous SA recommendation and are now significantly different from those in the Stage B report. For this reason, a further assessment was deemed necessary.

5.2 Method

- 5.2.1 As the objectives are strategic and, in their nature, not detailed, a compatibility test was deemed to be the most useful way of assessing whether the Local Plan objectives are in line with the objectives of the SA. If detailed appraisals were undertaken, scores would invariably be made up of many unknowns.
- 5.2.2 Once the testing was completed, consideration was given as to how any adverse impacts on sustainability might be removed or reduced and beneficial impacts enhanced. These suggestions were then built into the policy wording of the Draft Local Plan where appropriate (see Appendix B).
- 5.2.3 When testing these objectives, the following assumptions were made:
 - Where the term 'sustainable' is used, it refers to the definition of 'sustainable development' given by chapter 2 of the NPPF rather than the colloquial term used to describe developments that have easy access to services, facilities and travel options. The term thus mirrors the Sustainability Appraisal's expectation of what constitutes sustainable development.
 - Where the term 'appropriate' is used in relation to Green Belt release, it refers to the land that contributes weakly to Green Belt objectives or to the strategic reasons outlined in the Green Belt Topic Paper.
 - The term 'vibrant' refers to the popularity of a destination in terms of its provision of facilities, services and events and does not necessarily relate to tourism.

1. **Development needs:**
To deliver the housing, economic, and other needs identified for the borough by the end of the plan period through well designed, sustainable, plan led, and high quality development.
2. **Infrastructure needs:**
To achieve the delivery of all forms of infrastructure to mitigate the impact of development and where possible to result in 'betterment'.
3. **Travel:**
To prioritise active travel, but where necessary to plan appropriately for use by private motor vehicle, in particular embracing new technology.
4. **Housing:**
To significantly boost the supply of affordable housing, and to seek to redress the disparity between house prices and income in the borough.
5. **Vibrant borough:**
To ensure the borough is vibrant, culturally rich and economically buoyant.
6. **The borough's distinctive environment:**
To protect the valued heritage, and built and natural environments of the borough, including the AONB and to achieve net gains for nature.
7. **Green Belt:**
To strategically release appropriate land from the Green Belt through a plan-led approach, and to increase public accessibility, and to protect the openness of remaining Green Belt land.
8. **Climate Change**
To tackle climate change and minimise the impact of development on communities, the economy and the environment with carefully considered design and by embracing technology such as renewable energy generation.
9. **Garden Settlements:**
To establish garden settlements as a model for the future delivery of development in the borough.
10. **Neighbourhood Planning:**
To work with neighbourhood plan groups to ensure the formation of locally-led policies, with this reflected in decisions on planning applications.

Figure 4. Strategic Objectives of the new Local Plan.

5.3 Results

5.3.1 The outcome of the compatibility testing is show below in Table 8.

Table 8. Compatibility testing of Local Plan objectives with SA objectives.

		SUSTAINABILITY APPRAISAL 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	Deprivation	Education	Employment	Equality	Health & Wellbeing	Heritage	Housing	Land Use	Landscape	Noise	Resources	Services & Facilities	Travel	Waste	Water
LOCAL PLAN OBJECTIVES	Development Needs	1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Infrastructure Needs	2	?	?	✓	?	✓	✓	✓	?	?	✓	?	?	?	?	✓	✓	/	✓
	Travel	3	✓	?	✓	?	?	✓	?	?	?	?	?	?	✓	/	✓	✓	/	/
	Housing	4	x	x	?	x	✓	✓	✓	?	x	✓	x	x	x	x	?	?	?	x
	Vibrant Borough	5	/	/	✓	/	✓	✓	✓	✓	✓	/	/	/	/	/	✓	✓	/	/
	Distinctive Environment	6	?	✓	?	✓	?	/	?	/	✓	✓	x	✓	✓	✓	/	?	✓	✓
	Green Belt	7	?	✓	?	?	/	/	?	/	✓	✓	?	?	✓	?	?	?	/	/
	Climate Change	8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Garden Settlements	9	?	?	✓	?	?	✓	?	?	?	✓	x	?	?	?	✓	✓	?	?
	Neighbourhood planning	10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Legend:

✓	Objectives are compatible and/or enhance one another
x	Objectives incompatible and/or conflict with one another
/	Objectives have no clear relationship
?	Relationship between objectives is mixed or uncertain

5.3.2 To better analyse trends, Table 8 is then summarised according to the number of compatible sustainability objectives (see Table 9) and vice versa according to the number of compatible Local Plan objectives (see Table 10).

Table 9. Number of sustainability objectives that are compatible with Local Plan objectives.
Row colour indicates where there are more compatible objectives than incompatible (green) or vice versa (pink).

Local Plan Objective		Number of Sustainability Objectives			
		Compatible	Incompatible	Mixed or uncertain	No relationship
1	Development Needs	19	0	0	0
2	Infrastructure Needs	8	0	10	1
3	Travel	8	0	8	3
4	Housing	5	9	5	0
5	Vibrant Borough	9	0	0	10
6	Distinctive Environment	10	1	5	3
7	Green Belt	4	0	10	5
8	Climate Change	19	0	0	0
9	Garden Settlements	5	1	13	0
10	Neighbourhood planning	19	0	0	0

Table 10. Number of Local Plan Objectives that are compatible with sustainability objectives.
Row colour indicates where there are more compatible objectives than incompatible (green) or vice versa (pink). No colour indicates the mixed or uncertain objectives are more frequent than (or equally frequent) to the compatible objectives.

Sustainability Objective		Number of Local Plan Objectives			
		Compatible	Incompatible	Mixed or uncertain	No relationship
1	Air	4	1	4	1
2	Biodiversity	5	1	3	1
3	Business Growth	7	0	3	0
4	Climate Change & Energy	5	1	3	1
5	Deprivation	6	0	3	1
6	Education	6	0	2	2
7	Employment	8	0	2	0
8	Equality	6	0	2	2
9	Health & Wellbeing	6	0	2	0
10	Heritage	6	1	3	0
11	Housing	6	1	2	1
12	Land Use	4	2	3	1
13	Landscape	5	1	3	1
14	Noise	5	1	3	1
15	Resources	4	1	3	2
16	Services & Facilities	7	0	2	1
17	Travel	7	0	3	0
18	Waste	4	0	2	4
19	Water	5	1	1	3

- 5.3.3 Table 9 shows that the majority (nine out of ten) of the Local Plan Objectives are more compatible than incompatible with the Sustainability Appraisal objectives.
- 5.3.4 The Strategic Objective for housing (objective 4) is the only Local Plan objective that is incompatible with more sustainability objectives than is it compatible. This reflects the conflict between environmental constraints and high demands for housing. The economic and social sustainability objectives have a greater degree of compatibility with this local plan objective.
- 5.3.5 Strategic objectives 1 (Development Needs) and 8 (Climate Change) are deemed to be compatible with all sustainability appraisal objectives as they include either an expectation for development to be “sustainable” or for development to bring benefits/reduce impacts to the three key elements of sustainable development (environment, economic and social).
- 5.3.6 Strategic objective 10 is also deemed to be compatible with all sustainability objectives because locally-led policies within Neighbourhood Plans are expected to demonstrate how they will contribute to achieving sustainable development. In addition, policies are highly likely to be in the best interest of local communities and economies with high value placed upon the environment.
- 5.3.7 Table 10 shows there are no sustainability objectives that are more incompatible than compatible with the Local Plan objectives. However, there are several objectives that have a high number of mixed or uncertain scores. The majority of this uncertainty in scoring was created by the lack of detail inherent within strategic objectives.
- 5.3.8 Compatibility of sustainability objectives with Local Plan Strategy 9 (Garden Settlements) are based on those applied to Growth Strategy 4 in the Issues and Options Sustainability Appraisal. Alterations are made to reflect the fact that it is now known that this model would not be the only form of development in the borough and a clearer picture is now available on what sort of development would be created in a garden settlement. However, no presumption about potential locations for garden settlements is made for this element of the Local Plan thus several uncertain impacts are still predicted.

6 SA of the Spatial Development Strategy

6.1 Background and Method

- 6.1.1 The process of appraising potential growth strategies to inform the preferred Spatial Development Strategy for the new Local Plan was first recorded in the Issues and Options SA (2017). At this stage, 6 growth strategies options were identified and appraised in order to inform the Local Plan. These are described in Table 11.

Table 11. Growth Strategy Options considered by the Issues and Options SA.

Growth Strategy	Description
(1) Focused Growth	Development distribution focused as per existing Core Strategy, i.e. majority of new development directed to Royal Tunbridge Wells/Southborough, a smaller proportion to the other three main settlements of Paddock Wood, Cranbrook and Hawkhurst and limited development within the villages and rural areas.
(2) Semi-Dispersed Growth	Development distribution semi-dispersed, with the majority of new development directed to Royal Tunbridge Wells/Southborough and a proportion distributed to other main settlements of Paddock Wood, Cranbrook and Hawkhurst (as per Option 1), but additionally a percentage of development directed to some of the larger villages (taking account of the updated settlement hierarchy work). Limited development within the remaining villages and rural areas.
(3) Dispersed Growth	Development distribution proportional across all the borough's settlements.
(4) Growth-Corridor Led Approach	Development distribution focused around the A21, close to Royal Tunbridge Wells and Pembury, as a new 'growth corridor'.
(5) New Settlement Growth	New freestanding garden settlement. There is no location identified with this option. A new settlement could be located anywhere within the borough.
(6) Business As Usual (No Local Plan)	No planned growth takes place. Only windfall sites provide for the development needs of the borough and thus not all needs may be met.

- 6.1.2 At issues and options stage, predictions were inherently challenging given the high-level nature of the alternatives under consideration and lack of future baseline and locational information. For example, the HRA of the proposed growth had not yet been carried out in detail and thus the precautionary principle was enacted when assigning scores to the biodiversity objective.
- 6.1.3 Because of these limitations, readers were advised against summing the positives and negatives to determine an overall score for each strategy. All six scenarios had both positive and negative elements. The only clear conclusion that could be made was that alternative 6 (No Local Plan) was far less favourable overall than the other five options for growth i.e. planned growth was required in order to prevent significant negative effects in the borough.
- 6.1.4 In order to usefully guide the Local Plan in determining how the planned growth should be distributed, several recommendations were made. These ranged from

implementing new development management policies to ensuring the plan was infrastructure-led (see Appendix B).

- 6.1.5 Although these recommendations were felt to be the most useful output from the Issues and Options SA, it was noted that a slight preference was recorded for Growth Strategy 5 and that Growth Strategy 3 was slightly less positive than the other strategies. However, given the above limitations, this observation was tentative and qualified with the advice that an approach combining elements of multiple strategies would be beneficial in helping to minimise negative impacts.
- 6.1.6 Following Issues and Options stage, three further alternative growth strategies were identified for consideration through the Sustainability Appraisal. These are described in Table 12 and paragraph 6.1.8.

Table 12. Further growth strategy options for the new Local Plan considered by the SA

Growth Strategy	Description
(7) Growth including Sevenoaks Unmet Need	Development distribution that meets existing needs in line with the Development Strategy for the Draft Local Plan whilst also meeting the unmet needs of Sevenoaks Borough i.e. an additional 1,900 residential dwellings.
(8) Dispersed Countryside Growth	Development distribution that meets identified needs by directing development in the rural areas, much less to existing villages and much more to hamlets and to farmsteads, particularly in the High Weald AONB.

- 6.1.7 To consider the impacts of these further options, further Sustainability Appraisals were carried out.
- 6.1.8 Consideration was also given to a further option: growth that only partially meets identified needs. However, the iterative process through which sites were selected for development potential, including through the SA of sites, indicate that there is capacity in the borough to meet housing targets whilst still having due regard to AONB and Green Belt policies. Therefore, this option is not considered to be a reasonable alternative in the context of the NPPF at this point.
- 6.1.9 The method chosen for appraisal of the preferred growth strategy was to carry out a cumulative impact assessment⁷ of the total development proposed in each parish, Royal Tunbridge Wells and Southborough.
- 6.1.10 In addition to alternatives for the development strategy as a whole, alternatives to specific key elements of the strategy were considered as part of the sustainability appraisal. These were alternatives for:
- the location for a garden settlement
 - the scale of development for a garden settlement
 - the location for an urban extension
 - the scale of development for an urban extension
- 6.1.11 Potential sites for garden settlements and urban extensions in the borough are shown in Figure 5. The locations underwent the same filtering process as that for sites with potential for small scale development (see section 8.1) and are described

⁷ Cumulative impact assessment methodology can be seen in Appendix C.

in Table 13 with an explanation of why options were not considered reasonable where applicable.

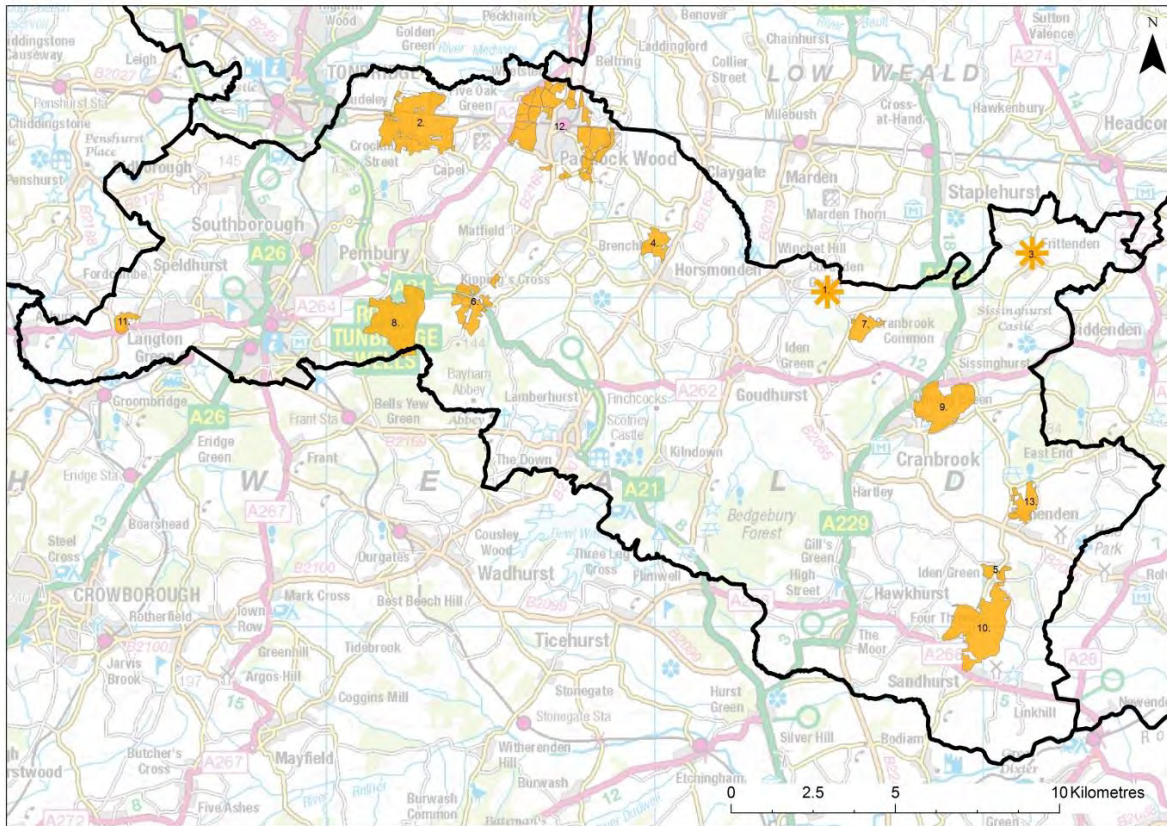


Figure 5. Map of garden settlement options within the Borough.
Numbering is explained in Table 13.

Table 13. Garden settlement and urban extension location options considered by the SA.

Ref	Locations Considered	Explanation of approach taken by SA	SA?
1	Blantyre House (former prison) Goudhurst Parish	Location has the benefit of being outside of some key constraints and is within reach of the mainline rail at Staplehurst. However, the scale of site was too small and the site was not submitted in the call for sites and thus this option did not become available for appraisal.	No
2	Capel	Submitted in the call for sites as a combination of site numbers 178, 183, 308, 418, 440, 446, 448, 452 and 453. Land is outside of key constraints (except Green Belt) with potential for useful transport links. The site was also within reasonable distance to other large settlements. This site was considered to be a reasonable alternative.	Yes
3	Frittenden area	Location has the benefit of being outside of key constraints and is not distant from mainline rail at Headcorn. However, site was not submitted in the call for sites and thus this option did not become available for appraisal.	No

Ref	Locations Considered	Explanation of approach taken by SA	SA?
4	Horsmonden	Submitted in the call for sites as site 144. Location would represent an increase in Horsmonden using garden settlement principles. Landscape sensitivity would require further consideration because the site is outside (but adjacent to) the AONB. However, the site was considered to have severe access difficulties that would render this alternative unviable and thus not a reasonable alternative.	No
5	Iden Green	Submitted in the call for sites as site 437. However, the site is wholly very rural and within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No
6	Kippings Cross East of Pembury and adjacent to the northern and southern carriageways of the A21	Submitted in the call for sites as a combination of site numbers 23, 300, 326, 111, 341, 383, 333, 214 and 65. However, the sites are within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No
7	Land adjacent to Colliers Green Primary School, Colliers Green	Submitted in the call for sites as site 325. However, the extremely rural nature of the site, distance to urban settlements and the impacts upon the setting of the AONB were considered too severe to warrant consideration as a reasonable alternative.	No
8	Land at Great Bayhall East of RTW	Submitted in the call for sites as site 384. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No
9	Land between Cranbrook and Sissinghurst	Submitted in the call for sites as late site 22. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No
10	Land between Sandhurst and Iden Green	Submitted in the call for sites as site 438. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No
11	Langton Green Adjoining western edge of existing development	Submitted in the call for sites as late site 23. Location would represent an increase in Langton Green using garden settlement principles with easy access to all the services and facilities that RTW provides. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No
12	Paddock Wood Land surrounding the existing settlement	Submitted in the call for sites as a combination of site numbers 20, 47, 51, 79, 141, 142, 212, 218, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 340, 342, 344, 347, 371, 374, 376, 402 and late sites 26, 48 and 52. Land is outside of key constraints (except flooding and Green Belt) and has useful transport links. This site was considered to be a reasonable alternative.	Yes
13	Walkhurst Farm, Benenden	Submitted in the call for sites as site 436. However, the site is within the AONB and its landscape impacts were considered too severe to warrant consideration as a reasonable alternative.	No

6.2 Results

6.2.1 The sustainability appraisals for the additional new alternatives detailed in section 6.1 is show below in Table 14.

Table 14. SA findings for the remaining alternative growth strategies.
Growth Strategy 7 (GS7) and Growth Strategy 8 (GS8). See Table 12 for descriptions.

Sustainability Objective	Growth Strategy Options		Commentary
	GS7	GS8	
Air	-	--	Development in the AONB to meet Sevenoaks unmet need largely means in the settlements of Cranbrook, Hawkhurst and other smaller villages. In all these locations sustainable and active transport options are limited and, even with improvements that could be brought about by increased development, the rural nature of the settlements will likely always mean that private car use is preferred. This will lead to a deterioration of air quality in these locations and cumulatively across the borough. This effect is would also be seen in a hamlet-style distribution but to a worse extent.
Biodiversity	0/-	-	Nature conservation designations are scattered across the borough but are more common in the AONB. Thus, greater development in the AONB could create increased pressure on wildlife. Likewise, planning for a higher number of smaller housing developments increases the changes that development will be near to a designated site.
Business Growth	++	+	Sevenoaks unmet need relates to residential dwellings only so would not necessarily bring any benefit to business, although may offer more support to service businesses. Conversely, while some land-based businesses may be supported by smaller developments, these are more likely to be unrelated to the rural economy and , moreover, have poorer access to local services, so less likely to contribute to businesses. Farmsteads often provide valuable business premises, which may well be undermined by higher, residential values.
Climate Change & Energy	--	--	Building a relatively large number of new homes is likely to increase carbon and energy demands. In addition, public transport is not always convenient in rural settlements so private car use is likely.
Deprivation	++	+	The AONB contains areas of income deprivation. However, additional housing for people with links to Sevenoaks is unlikely to address issues of deprivation. More dispersed development away from cheaper fuel sources may increase fuel poverty.
Education	++	++	Increased residential development will put increased pressure on existing schools. Expansions, safeguarding and provision of new schools would need to be made in-line with the infrastructure-led requirements of the Local Plan. Extra residential development would not bring about any benefits for adult education provision.
Employment	+++	+++	Extra development would create temporary jobs in construction only.
Equality	+	-	Extra development at rural settlements is likely to mean independent access to facilities for new residents is more challenging both in terms of distance and choice. This could disadvantage those residents with mobility, sensory and cognitive impairments. This effect is particularly acute for very rural hamlet and farmstead-based developments and results in a negative score.
Health	++	++	Extra residential dwellings are unlikely to make a difference to the existing health score. Provision for elderly care, pockets of health deprivation and accessible natural greenspace are unlikely to be addressed by new residential development. There is little difference in health terms between the high level of dispersal and the Draft Local Plan distribution.
Heritage	-/-	-/-	Development will be in the AONB. More development is evidently likely to have significant impacts in terms of historic character of the AONB, while there is potential for conflicts between conserving and enhancing designated and non designated heritage assets such as farmsteads with such a development option.
Housing	+++	++	The Local Plan has found suitable land in order to meet the current and projected housing needs for the borough. The additional benefits of meeting Sevenoaks unmet need would not alter the existing score. Hamlet-based development would potentially meet existing needs, but this more uncertain; furthermore, it would not provide on-site affordable housing in many cases. These factors reduce its housing score.
Land use	--/ ---	--/ ---	Extra development would need to be on greenfield land and will result in the loss of soils. In addition, further release of Green Belt land cannot be ruled out.
Landscape	---	--	Development will be in the AONB. Site assessments have shown that greater development will have significant negative landscape impacts. Hamlet and farmstead-based growth, beyond conversions and replacement under existing policy, is more likely to have a greater cumulative negative impact on historic landscape character, effectively suburbanising the countryside.

Sustainability Objective	Growth Strategy Options		Commentary
	GS7	GS8	
Noise	0 / -	-	Noise impacts in many rural settlements for the Draft Local Plan are largely neutral. Increased car travel from extra residential development has potential to make this slightly negative. Prioritised rural growth could impact negatively upon currently quiet locations.
Resources	?	?	As for the Draft Local Plan, this objective is largely unknown. Large amounts of demolition are not expected from extra residential development on greenfield land. However, choice of materials will be determined at Development Management stage.
Services & Facilities	-	---	Negative score reflects the poorer range and ease of access to services and facilities in the more rural settlements and especially in hamlet-based distribution development.
Travel	-	---	Negative scores reflect the poorer transport services available in the more rural settlements. In all these locations sustainable and active transport options are limited and, even with improvements that could be brought about by increased development, the very rural nature of the settlements will likely always mean that private car use is preferred.
Waste	0	0	Neutral score reflecting inability of site allocations to influence diversion of household and construction waste from landfill.
Water	0 / -	-	Extra homes unlikely to bring about significant betterment in terms of flood issues as the most significant flood issues are in the north of the borough, outside of the AONB. However, extra dwellings will put increased pressure on existing supplies. Large development is needed in order to secure the financial contributions needed to make flood betterment viable. The hamlet-based development is less likely to allow for this.

- 6.2.2 In carrying out the appraisal for Growth Strategy 7 (increased growth), it was assumed that a garden settlement within the AONB would not be appropriate (see Table 13) and that the Council had maximised development potential outside the High Weald AONB, including through strategic Green Belt releases for both a new garden settlement and the major expansion of Paddock Wood. Furthermore, it was proposed that substantial growth is already being accommodated at Horsmonden, the other more sustainable settlement outside the AONB, as well as through maximising opportunities for intensification through allocations within the main urban area of RTW/Southborough. Therefore, it was deemed reasonable to assume that the additional 1,900 dwellings would essentially be in the AONB.
- 6.2.3 Similarly, achieving the pattern of smaller settlements described by growth strategy 8 (rural growth) would mean increased development in more rural and tranquil areas, most of which is AONB.
- 6.2.4 The Final Interim SA showed that there were merits in all strategy options, although Option 5 New Settlement Growth had the highest number of positive scores and lowest number of negative scores. This option, which has been taken to embrace an enlarged town or village based on garden settlement principles as well as a new freestanding garden settlement, is therefore proposed to be integral to the preferred development strategy for the borough. Further consideration of the location and scale of such growth is given below.
- 6.2.5 It is noted that this Option has also been found to be necessary in order to meet the identified development needs, having due regard to the potential of existing settlements to grow, especially in the High Weald AONB, which covers nearly 70% of the borough.
- 6.2.6 It would neither be reasonable in SA terms, nor practical, to focus unduly on new or expanded settlements to meet be the sole focus of meeting the housing needs of the borough. An approach that combines the principles of other strategies was recommended in the Final Interim SA, would help address the negative scores in relation to biodiversity, education, equality and land use still score negatively for Growth Strategy 5.
- 6.2.7 Growth Strategy 4 scores particularly strongly for business growth and employment,

so it follows that this is incorporated into the strategy for economic growth. However, its negative landscape and land use scores are intrinsic and make it an unsuitable strategy for residential growth.

- 6.2.8 Growth Strategies 1-3, which essentially related to the spread of development across settlements, produced largely similar outcomes. More concentrated growth generally supported objectives concerned with access to jobs, services and facilities. However, in terms of important landscape and heritage considerations (which were important through the Issues and Options Consultation), then it was more balanced, with more of a spread across settlements being somewhat preferred in heritage terms. However, the further Option 8, for the Dispersed Countryside Growth, of hamlets and farmsteads, in fact scores relatively poorly against economic, social and environmental objectives,
- 6.2.9 Therefore, in the light of the various options, together with the findings of further studies, consideration of availability of sites and the views of parish and town councils, a preferred growth development strategy has been formulated with the following elements:
- Provision for infrastructure-led, housing needs in line with Growth Strategies 3 and 5 including significant expansion of Paddock Wood and a new, stand-alone garden settlement in Capel Parish allowing for approximately 14,000 new homes over the plan period
 - Provision for economic needs based on Growth Strategies 1, 2 and 4 including provision for approximately 14 hectares of employment land
 - Provision of new local facilities and services where required to support residential development in smaller settlements
- 6.2.10 This preferred development strategy has also been scored using the same method as other options. As noted above, it embraces the creation of a new garden settlement, together with major urban extension based on garden settlement principles. Both of these involve some loss of Green Belt land, it being found unreasonable for such large growth in the AONB. However, with a view to meet housing needs, the strategy also seeks, and finds scope for, growth within the AONB, being spread across a number of settlements, having first maximised potential outside the AONB.

Table 15. SA of Draft Local Plan spatial distribution strategy.

Sustainability Objective	Score	Commentary
Air	0 / -	Expected overall decline in air quality. However, substantial investment in active and sustainable travel methods will help offset this in urban areas.
Biodiversity	0	Small losses offset by potential large gains on strategic sites. Net gains policy will also bring benefits. Not considered at site level as gains could be offsite or out of parish.
Business Growth	++	Significant gains are proposed.
Climate Change	- / --	Energy and fuel use from buildings and transport will increase. However, strong climate change policy and renewable energy provision will provide benefits.
Deprivation	++	Substantial regeneration in urban areas
Education	++	New school provision, expansion plans and safeguarded land for schools will ensure the pressures from new residents are removed.
Employment	+++	Significant numbers of new jobs are proposed
Equality	++	Majority of development would provide benefits to social mobility and inclusion.
Health	++	No negative outcomes across the parishes. However, benefits disproportionately favour more urban settlements, largely because residents in urban areas are more likely to be within reach of accessible natural greenspaces.
Heritage	-	Overall a slight negative impact reflecting a balance between the large positive effects in Southborough and the smaller negative impacts elsewhere.
Housing	+++	14,000 new dwellings will ensure residents have better access to higher quality homes and the type of home they need.
Land use	--	Negative to reflect substantial losses of greenfield land and limited development on previously developed land.
Landscape	--	Negative to reflect scores in most parishes and predicted impacts upon sensitive landscapes.
Noise	?	A highly mixed score. Neutral impacts in many rural settlements and negative impacts in urban areas.
Resources	?	Largely unknown. Choice of materials will be determined at Development Management stage.
Services & Facilities	?	A highly mixed score. Negative impacts in rural settlements and positive impacts in urban areas.
Travel	?	A highly mixed score. Negative impacts in rural settlements and positive impacts in urban areas..
Waste	0	Neutral score reflecting inability of site allocations to influence diversion of household and construction waste from landfill.
Water	?	14,000 new homes will put increased pressure on existing resources. There is also potential for increased flood risk due to cumulative effects. However, significant betterment of flooding issues at Paddock Wood and Five Oak Green, and policies for other smaller sites, will provide significant positive benefits. Overall score is mixed.

6.2.11 In summary, for this option, as proposed in the Draft Local Plan, when objectives are divided into the three pillars of sustainable development the following observations can be made⁸:

- the economic objectives score mostly positively
- most of the social objectives score more positively
- the environmental objectives score well relative to alternative strategies

6.2.12 The further growth option that has been considered – a higher level of growth involving meeting any unmet needs from the Sevenoaks area – score worse notably in terms of environmental, including landscape, objectives, but also in relation to

⁸ Economic objectives are considered to be business growth, employment and services. However, it should be noted that the employment objective has a low weighting (see Appendix A). Environmental objectives are considered to be air, biodiversity, climate change, heritage, land use, landscape, noise, resources, waste and water. Social objectives are considered to be deprivation, education, equality, health, housing and transport. However, it is acknowledged that there is some degree of overlap between these categories.

some social objectives. It is therefore not considered to be an appropriate option, notwithstanding the possibility of needs not being met in Sevenoaks borough, which is similarly constrained.

- 6.2.13 Accepting that it is clear from this exercise that the DLP is preferable to the alternatives identified⁹, it then became necessary to carry out sustainability appraisals of the various key elements proposed within the development strategy itself. Namely:
- i. the location chosen for a garden settlement
 - ii. the scale of development for a garden settlement
 - iii. the location chosen for an urban extension
 - iv. the scale of development for an urban extension
- 6.2.14 As can be seen from Table 13, the two options deemed appropriate for sustainability appraisal were the large areas of land submitted in Capel parish and Paddock Wood. As an existing established settlement, it was logical to assess Paddock Wood for a potential urban expansion and especially because the other, larger settlements of RTW, Southborough, Hawkhurst and Cranbrook have many constraints. Similarly, the largely constraint-free area of land submitted in Capel parish was logical to assess as a potential garden settlement location. In both Paddock Wood and Capel, the only two key considerations are Green Belt and flood risk.

Garden Settlement Development Scale

- 6.2.15 Two scales of development were identified in Capel, both of which centred on Tudeley village (see Figure 6).
- 6.2.16 Option 1 was for the development of approximately 2,500 – 2,800 dwellings and Option 2 was for development of approximately 5,000 dwellings following the same pattern as that for Option 1 but extending southwards where land is not constrained by Flood Zone 3 but is in the AONB and Green Belt.

⁹ The term 'preferable' is used in this sense to mean the option that has the highest scores for the economic and social pillars, and the lowest scores for the environmental pillar.

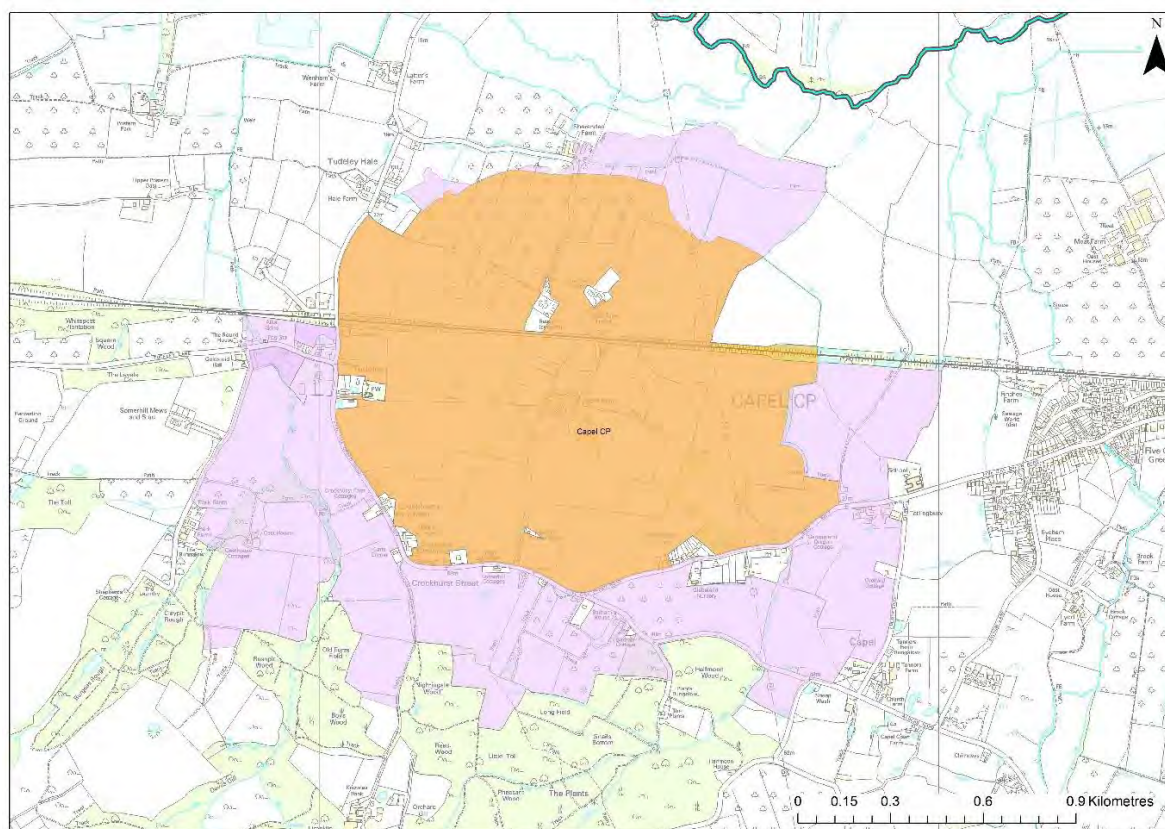


Figure 6. Map of growth options 1 (orange) and 2 (purple) for a garden settlement in Capel Parish.

6.2.17 The sustainability appraisals for these two options are shown below in Table 16.

Table 16. SA scores for the two alternative scales of growth of a garden settlement in Capel Parish. See paragraph 6.2.16 for descriptions.

Sustainability Objective	Garden Settlement Growth Options		Commentary
	1	2	
Air	?	?	Air quality is given a mixed score. Both options pose a high risk to deterioration of local air quality, with impacts worsening in line with the larger scale of Option 2. Traffic will increase substantially for both options and movement of vehicles into Royal Tunbridge Wells via the A26 (existing AQMA) is realistic. Likewise, a worsening of the AQMA on Tonbridge High Street must be considered (cross boundary impacts). Conversely, the new settlement will be designed to discourage private car use with active and shared transport options given priority. This will bring large benefits.
Biodiversity	0 / -	-	Generally, biodiversity constraints are limited. There is no risk the Ashdown Forest and neither option is within an SSSI Impact Risk Zone. Scores are applied to reflect the constraints in the south (LWS and ancient woodland).
Business Growth	+	+ / + +	Business scores are all positive and vary to reflect the number of new customers that could support existing businesses. Provision of new business space is likely to be significant. However, this is offset by losses to the rural economy from developing upon agricultural fields. For this reason, positive scores do not reach the maximum.
Climate Change	-	- / - -	Climate change scores reflect the increase in energy and fuel demands created by the new development with consideration of the fact that a master planning approach is more likely to implement adaptation measures and support alternative fuels.
Deprivation	+	+	Deprivation scores positively to reflect the substantial regeneration benefit. However, maximum scores cannot be applied as the proposals are unlikely to address existing problems of fuel poverty.
Education	+ / + +	+ / + +	All new educational pressures created are expected to be met by provision of new or extended schools. Adult education facilities are not considered, and it is expected that Royal Tunbridge Wells will continue to meet this demand.
Employment	++	++	Capel is not a key ward for a focus on employment. However, both options will benefit from new employment space and job creation, which would offset the loss of agricultural jobs from development on agricultural land.
Equality	++ / +++	++ / +++	Equality scores are positive for both options with access to facilities for those with impairments felt to be possible with a strong master planning approach.
Health	++	++	Both options score equally well on the health objective due to the provision of sports facilities that would help improve physical activity rates and the locality meeting 3 out of 5 Accessible Natural Greenspace Standards. It was also felt likely that the proposals for both options would include provision for elderly care services and improvements to ANG.
Heritage	-	- / - -	Variation in heritage scores reflect the increasing land take required across the two options and thus negative impacts that would occur largely upon the setting of heritage assets, with assets in the south being most sensitive. However, for both options it was felt that the master planning approach could help enhance a strategy for enhancements was realised.
Housing	+++	+++	Both options score the maximum positive on the housing objective for provision of substantial numbers of new dwellings including affordable and accessible. Despite offering varying quantities of new dwellings, the 2 options are not differentiated on this objective because, even the option with half the number of dwellings will still make a significant difference.
Land use	- - / - - -	- - -	Loss of greenfield, Green Belt land (albeit with compensation elsewhere) with Best and Most Versatile soils causes both options to be scored negatively for land use. However, Options 2 is slightly worse as release of Green Belt would create coalescence with Five Oak Green.
Landscape	- -	- - / - - -	Landscape scores follow a similar pattern to heritage reflecting encroachment into the AONB in the south and east whilst also recognising that opportunities for management of GI exist.
Noise	- / - -	- -	Noise scores reflect the varying scale of development across the two options and the location of development adjacent to the railway line.
Resources	0 / +	0 / +	Minimal demolition would be necessary to facilitate either option. Choice of materials will be determined at Development Management stage.
Services & Facilities	+++	++ / +++	The Services and Facilities objective scores positively for both options reflecting the likely well thought-out provision in the new settlement as a result of the master planning process. The settlement also benefits from the proximity of enhanced provision at the nearby North Farm retail park, Tonbridge and Royal Tunbridge Wells. However, option 2 is given a slightly lower score to reflect the piecemeal development in the south (to accommodate ancient woodland buffers) rendering new residents more distant from the centre.
Travel	++	++	The Travel scores are applied following a similar logic to air quality whilst also considering new bus routes and relatively easy access to train stations.
Waste	0	0	Waste reduction is generally felt to be outside of the scope of the development proposed for all options.
Water	++ / ?	?	A mixed/positive water scores is applied to option 1 as it would represent a substantial demand for water and wastewater treatment and would provide significant benefits to Five Oak Green in the form of reductions in existing flood risk. The presence of the total catchment of a Groundwater Source Protection Zone north of the railway line also creates a risk that must be carefully managed in both options. Option 2 would put additional strain on resources without any further improvement to flooding and thus is scores as mixed overall.

6.2.18 In summary, when objectives are divided into the three pillars of sustainable development the following observations can be made:

- the economic objectives score positively for both options (with Business Growth in Option 2 score slightly better to reflect the scale of the

development) for all objectives except Services. Option 2 scores slightly less positively for services as development would be more piecemeal in the south and thus some residents may be outside of desirable walking distances to the central facilities.

- most of the environmental objectives score more as mixed, negative or neutral with the exception of resources (to reflect insignificant or no requirement for demolition) and water (to reflect the flood betterment possible for Five Oak Green). Negative scores are a factor of the large scale of development and thus score more poorly for Option 2.
- the social objectives are scored positively and the same across all objectives

6.2.19 For both options, environmental protection conflicts with economic and social growth. However, adverse effects could be reduced by developing a garden settlement that is at a similar scale to Option 1.

Urban Extension Development Scale

6.2.20 In Paddock Wood, four scales of development were identified (see Figure 7) which all included the existing allocations for sites identified in the 2015 Site Allocations Local Plan (SALP). All the total numbers of dwellings described below include the SALP allocations (approximately 1000 new dwellings).

6.2.21 Option 1 was for the development of approximately 3,000 dwellings without any land take within the Green Belt. Growth here is limited by the borough boundary and the extensive areas of flood zone 3.

6.2.22 Option 2 was for development of approximately 5,000 dwellings following the same pattern as Option 1 with an additional extension of development westwards into the Green Belt some of which contributes weakly to Green Belt objectives.

6.2.23 Option 3 was for approximately 4,000 dwellings following the same pattern as Option 1 but extending southwards instead of westwards into land that is not ruled out by constraints such as AONB, Green Belt, flood risk and ancient woodland.

6.2.24 Option 4 was for approximately 6,000 dwellings following the same pattern as Option 1 but extending both westwards and southwards and effectively doubling the size of Paddock Wood.

6.2.25 No further larger options were assessed as it was felt that anything larger would be too distant from the town centre and unlikely to be delivered in the plan period.

6.2.26 The sustainability appraisals for these four options are shown below in Table 17.



Figure 7. Map of urban extension options for Paddock Wood.

Table 17. SA scores for the four urban extension growth options at Paddock Wood.
See paragraphs 6.2.21 to 6.2.24 for descriptions.

Sustainability Objective	Urban Extension Growth Options				Commentary
	1	2	3	4	
Air	?	?	?	?	Air quality is given a mixed score. All options pose a high risk to deterioration of local air quality, with impacts worsening as the scale of the development option increases. Traffic will increase substantially with all options and a bypass for Colts Hill will be important for Option 2 and critical for Option 4. Conversely, active and shared transport options will be given large investments and significant betterment could be seen. However, the improvements will always be working within the confines of Paddock Wood town so can never be given the maximum scores.
Biodiversity	0 / -	0 / +	-	0 / -	Generally, biodiversity constraints are limited. There is no risk to the Ashdown Forest and no options are within an SSSI Impact Risk Zone. Scores are applied to reflect the potential for significant enhancements in the west and the constraints in the south (LNR, woodland, ponds etc.).
Business Growth	+	+ / + +	+	+ / + +	Business scores are all positive and vary to reflect the number of new customers that could support existing businesses. Provision of new business space is likely to be significant. However, this is offset by losses to the rural economy from developing upon agricultural fields. For this reason, positive scores do not reach the maximum.
Climate Change	-	- / - -	- / - -	--	Climate change scores reflect the increase in energy and fuel demands created by the scale of each new development with consideration of the fact that a master planning approach is more likely to implement adaptation measures and support alternative fuels.
Deprivation	+ / + +	+ / + +	+ / + +	+ / + +	Deprivation scores positively to reflect the substantial regeneration benefit to Paddock Wood town which contains areas of high-income deprivation. However, maximum scores cannot be applied as the proposals are unlikely to address existing problems of fuel poverty.
Education	+ / + +	+ / + +	+ / + +	+ / + +	All new educational pressures created are expected to be met by provision of new or extended schools. Adult education facilities are not considered, and it is expected that Royal Tunbridge Wells will continue to meet this demand.
Employment	++	++	++	++	Paddock Wood is not a key ward for a focus on employment. However, all options will provide the benefit of new employment space and job creation, which would offset the loss of agricultural jobs from development on agricultural fields.
Equality	++	++	+ / + +	+ / + +	Equality scores are generally positive across the options with significant regeneration expected to benefit the areas of income deprivation, and access to facilities for those with impairments felt to be possible with a strong master planning approach. Variations across the options reflect the varying distance that those with impairments would have to travel to reach the central facilities of Paddock Wood. It was felt that the potential 2-3km distance for new residents in the south of development options 3 and 4 could be off putting.
Health	++	++	++	++	All options score equally well on the health objective due to the provision of sports facilities that would help improve physical activity rates and the locality meeting 4 out of 5 Accessible Natural Greenspace Standards. It was also felt likely the proposals for all options would include provision for elderly care services and improvements in ANG.
Heritage	0 / -	-	- / - -	--	Variation in heritage scores reflect the increasing land take required across the four options and thus negative impacts that would occur largely upon the setting of heritage assets, with assets in the south being most sensitive. However, for all options it was felt that the master planning approach could help ensure a strategy for enhancements was realised.
Housing	++ +	++ +	++ +	++ +	All options score the maximum positive on the housing objective for provision of substantial numbers of new dwellings including affordable and accessible. Despite offering varying quantities of new dwellings, the 4 options are not differentiated on this objective because, even the option with the lowest numbers will still make a significant difference.
Land use	--	-- / ---	--	-- / ---	Loss of greenfield land with Best and Most Versatile soils causes all options to be scored negatively for land use. However, options 2 and 4 are slightly worse as also include the release of Green Belt land that contributes moderately-weakly to the 5 purposes.
Landscape	-	-	--	--	Landscape scores follow a similar pattern to heritage reflecting encroachment into the High Weald Character Area in the south.
Noise	-	- / - -	- / - -	--	Noise scores reflect the varying scale of development across the four options and the location of development adjacent to the railway line.
Resources	0 / +	0 / +	0 / +	0 / +	Minimal demolition would be necessary to facilitate either option. Choice of materials will be determined at Development Management stage.
Services & Facilities	++	++	+	+	Services and Facilities score positively for all options reflecting the reasonable range of services in Paddock Wood and fact that some services would be outside of desirable walking distances for some new residents (e.g. health centre). However, options 3 and 4 are given lower scores to reflect the piecemeal development in the south (around ancient woodland) rendering new residents quite distant from Paddock Wood town.
Travel	+	+	+	+	Travel scores are applied following a similar logic to air quality.
Waste	0	0	0	0	Waste reduction is generally felt to be outside of the scope of the development proposed for all options.
Water	?	++ / ?	?	++ / ?	A mixed water scores is applied equally across the options as all would represent a substantial demand for water and wastewater treatment, and all would provide significant benefits to Paddock Wood in the form of reductions in existing flood risk. The benefits could be slightly greater in options 2 and 4 where development is directed to the areas of flood zone 2 and 3 west of Paddock Wood. An improvement to flooding issues for existing residents is one of the key justifications for the proposed release of this Green Belt land on the west side of the settlement.

6.2.27 In summary, when objectives are divided into the three pillars of sustainable

development the following observations can be made:

- the economic objectives mostly score positively for all options with Business Growth in Options 2 and 4 scoring slightly better to reflect the scale of the development (offset with losses to the rural economy). The one exception to this pattern is the services objective which reduces in positivity to reflect the increasing scale of development across the four options with more piecemeal in the south meaning some residents may be outside of desirable walking distances to the central facilities.
- most of the environmental objectives score more as mixed, negative or neutral with the exception of resources (to reflect insignificant or no requirement for demolition) and water (to reflect the flood betterment possible for Paddock Wood). Negative scores are mostly a factor of the large scale of development and thus score most poorly for Option 4. However, land use and biodiversity are an exception to this rule with scores across the options varying to reflect the position of development around Paddock Wood
- the social objectives are scored positively and the same across all objectives except equality which reduces in positivity to reflect the increasing scale of development across the four options with more piecemeal in the south meaning some residents may be outside of desirable walking distances to the central facilities.

6.2.28 As for Tudeley Village, environmental protection conflicts with economic and social growth in all options. However, adverse effects could be reduced by developing a garden settlement that is at a similar scale to Options 1 or 2. Between these, Option 2 has three objectives that score more positively than Option 1 (including the benefits to the wider surrounds), and 4 objectives that score more negatively than Option 1 (reflecting development scales and locations). It is fair to conclude that Options 1 and 2 have approximately similarly outcomes overall.

6.2.29 Ultimately, the scale of development at Paddock Wood was determined in relation to the housing objective which was not differentiated across the four options in the SA (all options would make substantial contributions). However, housing is of great importance to the council in meeting targets and options that not only meet targets but also improve the flood risk for existing residents must be highly weighted.

6.2.30 For these reasons, the council has opted to pursue Option 2 in the Draft Local Plan.

7 SA of the Strategic Policies

7.1 Background and Method

7.1.1 In addition to the Development Strategy (and related place shaping strategies), 9 further strategic policies were developed for the Draft Local Plan. These are as follows:

- STR 2 – Presumption in Favour of Sustainable Development
- STR 3 – Master planning and use of Compulsory Purchase Powers
- STR 4 – Green Belt
- STR 5 – Essential Infrastructure and Connectivity
- STR 6 – Transport and Parking
- STR 7 – Place Shaping and Design
- STR 8 – Conserving and Enhancing the Natural, Built and Historic Environment
- STR 9 – Neighbourhood Plans
- STR 10 – Limits to Built Development Boundaries

7.1.2 Sustainability appraisals for each of these policies (except Strategic Policy 4 Green Belt) were carried out following the standard method described in Chapter 4.

7.1.3 Strategic Policy 4 related to specific releases of Green Belt land and so it was deemed appropriate to carry out a cumulative impact assessment¹⁰ of all sites allocated within the Draft Local Plan that included release of Green Belt land.

7.1.4 For each policy (except STR 4 – see below) an alternative was assessed in which the policy was not included within the Draft Local Plan, but that reliance was placed on a combination of national policies in the NPPF and its related Planning Practice Guidance, together with any relevant detailed policies proposed in the draft Local Plan. Of note:

- Policy STR 2: The NPPF paragraph 11 sets out the national presumption in favour of sustainable development in similar terms;
- Policy STR 3: The NPPF provides little explicit coverage of comprehensive development, except in relation to design. Draft Local Plan policy EN1 focuses on design principles, while other policies address other local sustainability issues and allocations generally cross-refer to them, albeit not in relation to working with different land ownership patterns to secure effective delivery;
- Policy STR 4: The NPPF provides thorough coverage of Green Belt issues although, as stated above, the policy is based on making the releases set out in the Draft Local Plan, so is appraised on that basis, effectively as a cumulative assessment of the relevant individual development allocations. As this is a cumulative assessment, no specific alternative approach is identified. Rather, the appraisal provides an indication of the sustainability impacts of the proposed releases, which are each subject to their own appraisal;
- Policy STR 5: Identifying and coordinating the provision of infrastructure is highlighted as being critical to meeting economic objectives in the NPPF and

¹⁰ Cumulative impact assessment methodology is found at Appendix C.

is regarded as a strategic matter. It covers a wide range of infrastructure and supports seeking appropriate provision or contributions through development. This provides the basis of the “no policy” option;

- Policy STR 6: The NPPF gives particular attention to sustainable transport, while individual Draft Local Plan allocations address site-specific issues. However, STR 6 takes a holistic and strongly “active travel” position applied to local circumstances. The respective appraisals reflect this distinction;
- Policy STR 7: Design is a strong theme in both the Local Plan, as reflected by both the place shaping policies and the Environment and Design policies, and the NPPF. The appraisal reflects the strategic focus provided by STR 7;
- Policy STR 8: The Draft Local Plan policy is compared to a No Policy option which relies on the NPPF and site-specific policies and relevant non-strategic policies;
- Policy STR 9: Neighbourhood planning is well supported through the NPPF, and this provides the basis of the alternative to STR 9 (which elaborates on the regard to neighbourhood plans);
- Policy STR 10: The alternative to continuing to use Limits to Built Development (LBDs) as a policy tool is simply not to have them, with all proposals being determined on their merits, with likely more unplanned, scattered development.

7.2 Results

- 7.2.1 The sustainability appraisals for Strategic Policies 2 – 10 are shown below in Table 18 and Table 19.
- 7.2.2 The full cumulative impact assessment which was used to derive the scores for STR 4 Green Belt can be seen in Appendix D.

Table 18. SA findings for the Strategic Policies (part 1 of 2).
See paragraph 7.1.1 for descriptions.

Sustainability Objective	Score						
	STR 2 Sustainable Development		STR 3 Master planning		STR Green Belt*	STR 5 Infrastructure	
	No policy	Policy	No policy	Policy		No policy	Policy
Air	+++	+++	++	+++	?	+	++
Biodiversity	+++	+++	++	+++	0	+	++
Business Growth	+++	+++	++	+++	++	+	++
Climate Change	+++	+++	++	+++	--	+	?
Deprivation	+++	+++	++	+++	++	+	++
Education	+++	+++	++	+++	+++	+	+++
Employment	+++	+++	++	+++	+++	+	+
Equality	+++	+++	++	+++	++	0	0
Health	+++	+++	++	+++	++	+	++
Heritage	+++	+++	+++	+++	- / --	?	?
Housing	+++	+++	++	+++	+++	++	+++
Land use	+++	+++	-	+++	---	?	?
Landscape	+++	+++	+	+++	0	?	+++
Noise	+++	+++	+++	+++	0	?	?
Resources	+++	+++	+	+++	0	?	?
Services & Facilities	+++	+++	+	+++	0	+	+++
Travel	+++	+++	++	+++	0	+	+++
Waste	+++	+++	+++	+++	0	0	0
Water	+++	+++	++	+++	0	+	+++
Commentary	<p>The policy proposes a wording that reflects the NPPF definition of sustainable development. This is taken to be equivalent to and compatible with the Sustainability Appraisal objectives deemed important for the borough.</p> <p>It follows that the sustainability effects of both approaches are the same. It may be concluded that the policy is not essential, but it does provide confirmation of the applicability of the national policy at the local level.</p>		<p>Promoting comprehensive development, master planning and potential use of compulsory purchase powers clearly offer greater opportunities for improved service provision and better integration between buildings, social settings, and their surrounding environments.. These are reflected in the better, or at least the same, scores across all sustainability objectives.</p> <p>It follows that without the policy, the potential for producing a sustainable development would not be realised.</p>		<p>Green belt land is being released to allow for various types of development in the plan period. Scores are applied to reflect the impacts that the proposed Green Belt releases would have on each sustainability objective thus this is, in effect, a cumulative impact assessment of Green Belt release sites. The scale of Policy AL/PW 1 and AL/CA 1 in comparison to the other allocations, dominates this assessment of cumulative effects. Mixed scores for air, services, transport and water reflect wide variety of scores across the sites.</p> <p>Without this policy, these benefits and adverse effects would not be realised.</p>	<p>Most scores applied represent either direct benefits (e.g. water, education, services) or indirect benefits from the policy (e.g. biodiversity may improve with increased provision of green and blue infrastructure, air quality may improve will provision of highway improvements that deter private car use). Where benefits cannot be guaranteed a slightly less positive score has been applied. Several objectives are unknown as it is difficult to predict impacts without locational details. Only in relation to climate change is the positive approach of the NPPF not carried forward, as the one specific site for renewable energy is not guaranteed, while the promotional policy for new developments has an uncertain take-up.</p> <p>Overall, without this policy, the many improved scores, and associated benefits would not be realised.</p>	

* See Appendix D for more detail.

Table 19. SA findings for the Strategic Policies (part 2 of 2)
See paragraphs 6.2.21 for descriptions.

Sustainability Objective	Score									
	STR 6 Transport		STR 7 Place shaping		STR 8 Environment		STR 9 Neighbourhood Plans		STR 10 Limits to Built Development	
	No policy	Policy	No policy	Policy	No policy	Policy	No policy	Policy	No policy	Policy
Air	+	+++	0	++	0	0	++	++	++	+++
Biodiversity	?	+	+	++	++	+++	++	+++	++	+++
Business Growth	+	+++	+	++	0	0	++	+++	++	+++
Climate Change	++	+++	+	++	0	0	++	++	+	+++
Deprivation	0	0	+	++	0	0	++	+++	+	++
Education	0	0	+	++	0	0	++	+++	+	++
Employment	0	0	+	++	0	0	++	+++	++	++
Equality	0	0	+	++	0	0	++	+++	+	++
Health	0	0	+	++	+	++	++	+++	+	++
Heritage	?	+	+	++	++	+++	++	+++	+	++
Housing	0	0	++	++	0	0	++	+++	+++	++
Land use	0	0	+	++	0	+	++	++	0	+++
Landscape	0	+	+	++	++	+++	++	+++	+	+++
Noise	0	++	+	++	0	0	++	+++	++	++
Resources	0	0	+	++	0	0	++	+++	0	+++
Services & Facilities	+	+	+	++	0	0	++	+++	+	+++
Travel	++	+++	+	++	0	0	++	++	+	+++
Waste	0	0	0	++	0	0	+	++	+	++
Water	0	0	0	++	++	+++	++	+++	+	++
Commentary	Most scores applied represent either direct benefits (e.g. air, noise, climate change and travel) or indirect benefits from the policy (e.g. biodiversity and landscape may improve with increased provision of green infrastructure accommodating walking and cycling routes). The strong active travel focus of the policy increases the benefits relative to the no policy option..		Score reflect promotion of sustainable design standards which will be compatible with all the Sustainability Appraisal objectives deemed important for the borough, albeit maximum scores are not applied because the use of these "high" standards is not guaranteed. There is currently no policy of this type; thus without it these benefits would not be realised.		This new policy has highly positive benefits for the environmental objectives of heritage, landscape and biodiversity. The health objective also benefits indirectly as the environment is strongly linked to wellbeing. Overall, it is notable that while the NPPF and detailed Local Plan policies provide benefits in similar respects, the strategic focus of this locally important topic, provides added benefits.		Under the basic conditions, neighbourhood plans are required to promote sustainable development. This is equivalent to and compatible with the Sustainability Appraisal objectives deemed important for the borough. The policy promotes neighbourhood plans, including through information sharing, and the weight to be given them, so scores somewhat better particularly in relation to most social objectives.		LBDs aim to focus development in settlements with adequate social and economic infrastructure and restrict development in the surrounding countryside, which is most beneficial for environmental assets, mainly due to greater land use efficiency. It also contributes to several social and economic objectives, mainly due to the greater certainty in planning infrastructure. A more laissez faire approach may allow more development but not necessarily in sustainable locations.	

- 7.2.3 In summary, when objectives are divided into the three pillars of sustainable development the following observations can be made:
- the economic objectives score either positively, neutral or unknown for all strategic policies. There are no negative scores.
 - the environmental objectives are scored as positive, neutral or unknown for most strategic policies. However, some negative scores are recorded in Policy STR 4 (Green Belt) to reflect the potential impacts upon sensitive settings and, in the case of the climate change objective, large demand for energy and fuel.
 - the social objectives are scored as positive, neutral or unknown for most strategic policies. There are no negative scores but objectives for Services and Transport are scored as mixed overall for Policy STR 4 (Green Belt) to reflect the wide variation in positive and negative scores across the sites allocated for Green Belt release.

8 SA of the Potential Development Sites

8.1 Background and Method

- 8.1.1 All sites submitted to the Council's Call for Sites process were assessed against a robust methodology which is set out in the Strategic Housing and Economic Land Availability Assessment (SHELAA). This included all sites received through two Call for Sites processes and sites received since then but prior to the 22nd February 2019 (known as 'late sites' or 'additional sites' and 'A_S' on all figures in this chapter).
- 8.1.2 Sites received since 22nd February 2019 will be assessed using this same methodology for possible inclusion in the final, Pre-Submission version of the Local Plan (Regulation 19). Likewise, any further sites received as part of the Regulation 18 consultation on the Draft Local Plan will be assessed for possible inclusion in the Pre-Submission Local Plan using the same methodology.
- 8.1.3 A number of sites were filtered out during a first stage initial assessment of sites. For the purposes of this SA report, these are sites that are not considered to be reasonable alternatives requiring a sustainability assessment.
- 8.1.4 Sites filtered out at this initial first stage assessment stage include sites:
- Located in remote locations away from existing settlements; such sites considered unlikely to be sustainable in this context; in some instances some remote sites have been considered in the context of a new garden settlement where applicable or as urban extensions;
 - Not well related to a settlement; this has included sites that may be in relative close proximity to a settlement but are not well related to the built form of the settlement for example because they are cut off / separated from the settlement / built form in some way;
 - Clearly likely to provide less than 10 residential units;
 - About which there is significant landscape concern, which it is considered is unlikely to be overcome;
 - About which there is significant topography concern, which it is considered is unlikely to be overcome;
 - About which there is significant heritage concern, which it is considered is unlikely to be overcome;
 - About which there is significant concern that development of the site would cause coalescence of settlements;
 - That are wholly Ancient Woodland or a significant proportion of the site is Ancient Woodland, significantly reducing the developable area of the site; in some cases, depending on the extent of developable area remaining, sites have continued to be assessed through the assessment process. Sites with a developable area likely to yield below 10 residential units have been filtered out as per the bullet point above;
 - That are a designated Local Wildlife Site or there are other ecological reasons for not taking a site forward;
 - That are protected by a Tree Preservation Order on the whole site;

- That have received planning permission and are substantially under construction;
 - Located entirely outside the Tunbridge Wells Borough boundary
- 8.1.5 It is noted that site assessment work has been an on-going iterative process and that some sites initially filtered out may have subsequently been re-assessed.
- 8.1.6 In carrying out the sustainability assessment of reasonable alternatives, the following assumptions were made:
- Generally a yield of 30 units per hectare was applied. A high-level indicative yield was taken, calculated using 30 units per developable hectare based on the extent of the site area minus any level 1 constraints;
 - There were exceptions to this rule including on larger sites for example. It was recognised that some sites would require land take for the provision of open space and landscape buffers. In such instances a high-level judgement has been made which has informed the sustainability assessment of the site;
 - Some sites achieved an indicative high-level yield exceeding 10 units. However, a judgement was made informed by recent appeal decisions on the sites, which lead officers to believe that a realistic yield would in fact be below 10 units. As such these sites were ruled out as reasonable alternatives in line with the criteria set out above. In other cases where yields were borderline but above 10 units, sites were assessed as reasonable alternatives with the knowledge that detailed refinement work would be needed to inform a more realistic yield for the site;
 - reasonable alternative sites were assessed on the basis of them being for a wholly residential scheme. There were exceptions to this where a site would clearly facilitate an extension to an existing non-residential use;
 - When assessing reasonable alternative sites against the education sustainability objective, in rural settlements an assumption has been made that the site will generate a demand at the school serving that particular settlement.
 - Assessing sites against the education sustainability objective at Royal Tunbridge Wells was more complex as children here tend to go to schools that are more spread out across the main urban area. A judgement has been made based on one or two schools as necessary.
- 8.1.7 Following the determination of reasonable alternatives, the methodology for sustainability appraisal set out in Chapter 4 of this report was followed for each site.
- 8.1.8 All sites were initially scored according to the above method and recommendations for mitigation were made to the Council. When the Council reached the stage of deciding what type of development should be proposed on each site, the SA scores for allocated sites were adapted to take this into account.
- 8.1.9 Where proposals were put forward by the Council to safeguard land for a particular purpose, the SA objectives were scored as neutral for all objectives except any that related directly to the proposed purpose for safeguarding. For example, land safeguarded for future education use was scored as neutral for all objectives except Education which was assigned a positive score.
- 8.1.10 Sites were then grouped into parishes and cumulative sustainability appraisals were

carried out for the parish as a whole by reflecting on the range of scores across the parish in combination with the Strategic Policy for the parish and any other policies in the Draft Local Plan that were relevant to the parish. For example, DM policy TP 6 was considered in the cumulative scores for Pembury parish.

- 8.1.11 Tables containing the scores for allocated sites including cumulative impacts were completed for each parish (and Royal Tunbridge Wells), followed by a discussion of impacts. The purpose of the cumulative impact assessment was to predict the combined effects of the strategic policies and allocations. Measures were proposed to enhance beneficial impacts and reduce adverse impacts. The council has responded to these suggestions and included them in the development parameters of individual site allocations and strategic policies for parishes wherever possible (Appendix B).

8.2 Results

- 8.2.1 Summary tables for each parish including cumulative impacts assessments are provided below. More detailed commentaries for individual sites can be viewed in Appendices E - T.
- 8.2.2 It should be noted that it was not possible to simply allocate the sites with the most favourable SA score, as there are other factors which must be considered.
- 8.2.3 At a high level, the site selection must be in accordance with the development strategy of the Draft Local Plan (STR 1). As a starting point sites have been assessed in order to meet the overall need for housing and employment development.
- 8.2.4 Further factors outside of the SA process were also considered when making decisions over sites to be allocated. The Borough Council placed great emphasis in the preparation of this Plan on working with local communities, particularly in the villages. Such engagement in combination with a consideration of national policy requirements contributed to the selection of sites for shortlisting, as well as the proposed site allocations.
- 8.2.5 In addition, consultation was carried out with service providers such as KCC Highways and Transportation, KCC Education and Southern Water. In some cases, sites have been ruled out for practical reasons such as highway safety and access, where they might have originally been considered appropriate.

Royal Tunbridge Wells

Table 20. List of reasonable alternative sites in Royal Tunbridge Wells

Site Ref	Site Address	Policy Ref
7	Montacute Gardens, Royal Tunbridge Wells, TN4 8HG	Not allocated.
24	Tunbridge Wells Garden Centre, Eridge Road, Tunbridge Wells TN4 8HP	AL/RTW 16
30	Land at Caenwood Farm and Whitegates Farm, Reynolds Lane, Royal Tunbridge Wells	Not allocated.
39	Land adjoining Dunorlan Park, Pembury Road, Tunbridge Wells TN2 3QN	Not allocated.
53	Plot A: Land to the north of Hawkenbury Recreation Ground and Plot B: Land to the east and north of Hawkenbury allotments, Hawkenbury	AL/RTW 23 (part site)
57	Land adjacent to Longfield Road, Tunbridge Wells	AL/RTW 12
72	Former North Farm landfill site, North Farm Lane, Tunbridge Wells TN2 3EE	AL/RTW 14
73	Land at Pembury Road (south), Tunbridge Wells	Not allocated.
85	Land at Goods Station Road, Tunbridge Wells	AL/RTW 7
99	Land at Pembury Road, Tunbridge Wells TN2	Not allocated.
100	Land to the south of Speldhurst Road, adjacent to Whitegate Close, Royal Tunbridge Wells	Not allocated.
101	Colebrooke House, Pembury Road, Capel TN11 0QD	AL/RTW 13
114	Land at Sandown Park, west of A21, Royal Tunbridge Wells TN2 4RT	Not allocated.
116	Land south of Pembury Road, Tunbridge Wells	Not allocated.
134	Land around Sandstone House, Longdrift, Court Lodge and Shallowdene, Broadwater Down, Royal Tunbridge Wells TN2 5PE	Not allocated.
137	Land to the west of Eridge Road at Spratsbrook Farm, Royal Tunbridge Wells TN3	AL/RTW 18 (part site)
138	Knights Park, Tunbridge Wells TN2 3UW	AL/RTW 15
139	Knights Park, Tunbridge Wells TN2 3UW	AL/RTW 15
140	Knights Park, Tunbridge Wells TN2 3UW	AL/RTW 15
145	WA Turner Factory Site, Broadwater Lane, Tunbridge Wells TN2 5RD	Not allocated
165	Pantiles Car Park, Major Yorks Road, Tunbridge Wells TN2 5TP	Not allocated
175	Court Lodge & Land to rear of Sandstone House, 44 Broadwater Down, Tunbridge Wells TN2 5PE	Not allocated
176	Former Plant and Tool Hire site on Eridge Road, Tunbridge Wells TN4 8HJ	AL/RTW 11
198	Tunbridge Wells Telephone Engineering Centre, Broadwater Lane, TN2 5RE	AL/RTW 20
199	Land and buildings at Smockham Farm, Reynolds Lane, TN4 9XL	Not allocated.
200	Former Morrisons and Torrington Car Park site, Vale Road, TN1 1BT	AL/RTW 4
205	Little Knoll, Reynolds Lane, Royal Tunbridge Wells, TN4 9XL	Not allocated.
226	St Mark's Recreation Ground, Frant Road, Tunbridge Wells, TN2 5LS	Not allocated.
235	Land at Culverden Stadium, Culverden Down, TN4 9SG	AL/RTW 21
236	Land at Bayham Sports Field West, Bayham Road, Tunbridge Wells	AL/RTW 22
237	Land at Cadagan Sports Field, St John's Road, Tunbridge Wells	AL/RTW 24
238	Land at Colebrook Sports Field, Liptraps Lane, Tunbridge Wells	AL/RTW 25
249	Cemetery Depot, Benhall Mill Road, Tunbridge wells	AL/RTW 26
250	Land at Royal Victoria Place, Tunbridge Wells	AL/RTW 2
251	8 Grosvenor Road, Royal Tunbridge Wells	AL/RTW 2

Site Ref	Site Address	Policy Ref
255	Land at Hawkenbury, off Hawkenbury Road/Maryland Road	AL/RTW 27
260	Auction House and public car park, Linden Park Road, Royal Tunbridge Wells, TN2 5QL	AL/RTW 10 (part site)
261	Former North Farm landfill site, North Farm Lane, Tunbridge Wells TN2 3EE	AL/RTW 14
262	Mount Pleasant car park and surgery, Mount Pleasant Avenue	AL/RTW 1
263	Mount Pleasant car park and surgery, Mount Pleasant Avenue	AL/RTW 1
264	Town Hall/Town Centre site, Royal Tunbridge Wells	AL/RTW 6 (part site)
267	Rowan Tree Road, Showfields, Tunbridge Wells	AL/RTW 28
268	Vale Avenue and Torrington Car Park, Tunbridge Wells	AL/RTW 4
328	Land at Eridge Road & Eastlands Close, Royal Tunbridge Wells	Not allocated.
359	Land to the east of Halliwell Nursing Home, Kingswood Road	Not allocated.
400	Land to the east of Halliwell Nursing Home, Kingswood Road	Not allocated.
411	Land at Sandown Park between Pembury Grange and A21, Tunbridge Wells	Not allocated.
434	Tutty's Farm, Hawkenbury, Royal Tunbridge Wells	Not allocated.
EA_72	Land at 36-46 St John's Road	AL/RTW 17
EA_83	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	AL/RTW 8
EA_101	Land at 77 Mount Ephraim (Sturge House, Brockborne House)	AL/RTW 19
EA_132	Former cinema site, Mount Pleasant Road	AL/RTW 3
EA_194	Land at former Gas Works, Sandhurst Road	AL/RTW 29
EA_195	Land at 1 Meadow Road and 8 Upper Grosvenor Road	AL/RTW 9
MR_1	Land at Medway Road	AL/RTW 30
EA_263	Land at 123-129 Silverdale Road	AL/RTW 31
EA_335	Land at Beechwood Sacred Heart School	AL/RTW 32
EA_1012	Library and Adult Education Centre	AL/RTW 5
HHR_1	Halls Hole Road	TP 6

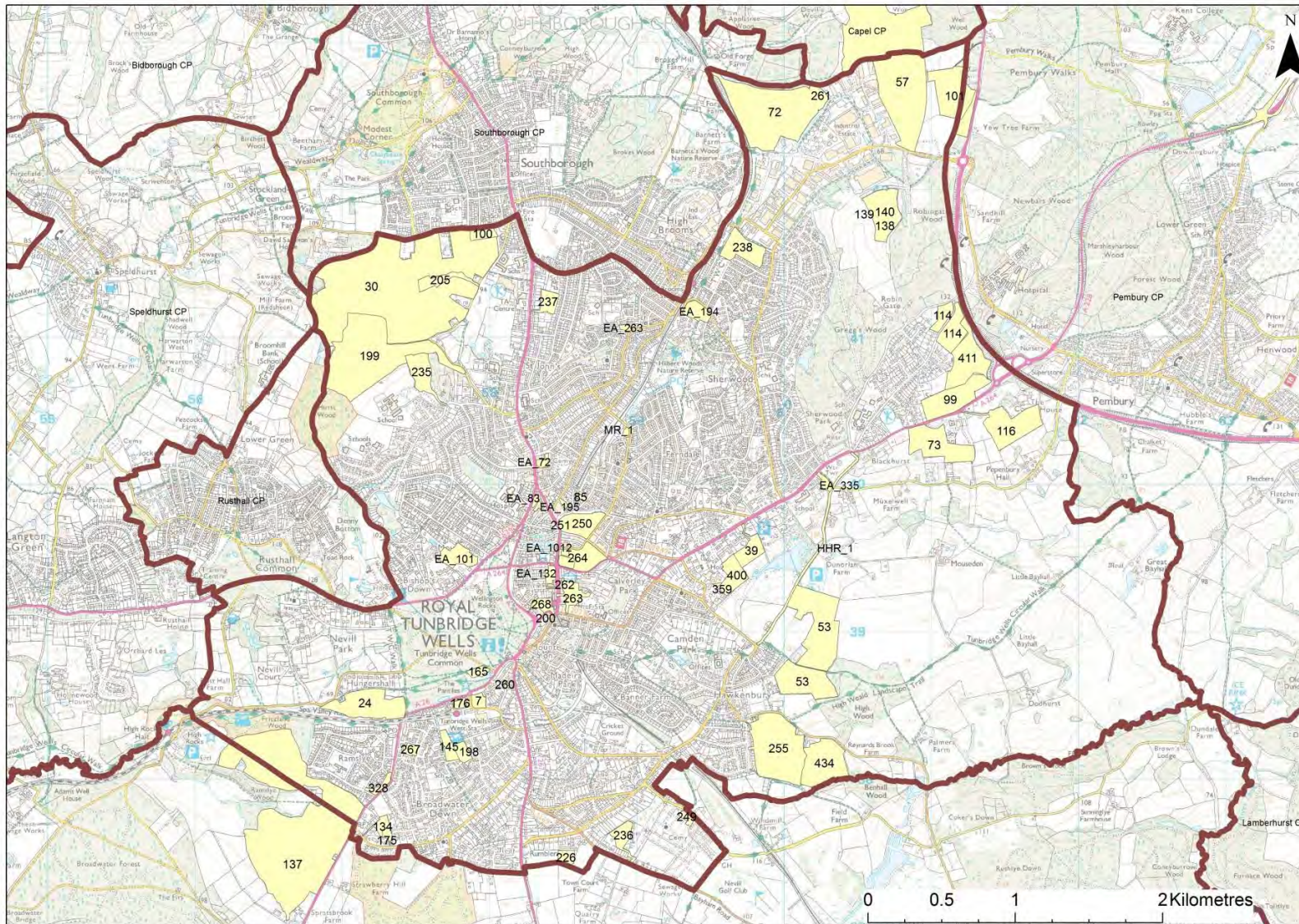


Figure 8. Map of reasonable alternative sites within Royal Tunbridge Wells

Table 21. SA scores for allocated sites in Royal Tunbridge Wells.

Sustainability Objective	Scores for AL/RTW...																																TP 6	STR/RTW 1	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32			
Air	?	?	?	?	?	?	?	?	-	?	?	0	0/-	0	0/+	?	?	-	?	?	?	0	0	?	0/+	0	?	0	0/+	0	0	0	0/-	0	?
Biodiversity	-	0	0	0/-	0	0	0	0	0	0	0	0/-	0/-	0	0	0/-	0	0/-	0	0	0	0	0	0	0	0	0	0	0	0/-	0	0	0	0	0/-
Business Growth	0/+	+	0/+	+	0/+	0/+	-	-	+	0/+	?	0/+	0/+	0/+	0/+	+/?	-	0	+	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	+
Climate Change	0/-	0/-	0/-	0/-	0	0	0	0/-	0	0	0	0/-	0/-	?	0/-	0/-	0	-	0	0	0/-	0	0	0	0/-	0	-	0	-	0	0	0	0/-	?	--
Deprivation	0/+	0/+	+	0/+	0/+	0/+	0	0/+	0	0	0/+	0	0	0	0	0/+	0/+	0	0	0/+	0	0	0	0	0	0	0	0	0/+	+	0	0/+	0	0	+
Education	0	0	0/+	0/+	+	0	0/+	0	+	0	+	0	0	0	0	+	0/?	++/+ +++	0	+	0/+	0/+	0	+	+	0/+	++/+ +	0	0/+	0/+	+	0	0	++	
Employment	+++	+++	+++	+++	++	++	+	+	+	++	?	+++	+++	+++	+++	+	+	++	+++	+	+	+	+	+	+	+	+	++	+	+	+	+	+	0	+++
Equality	+/+ +	+/+ +	+/+ +	+/+ +	+/+ +	+/+ +	+/+ +	+/+ +	+/+ +	+/+ +	+/+ +	0	0	0/+	0	+/+ +	+/+ +	++	+/+ +	+/+ +	+	0	+	+	0/+	+	+	+/+ +	+	+/+ +	+	+	+	0	++
Health	0/+	0	0/+	0/+	0	0	0/+	0/+	0	0	0/+	0	0	0	0	0/+	0/+	0/+	0/+	0/+	0/+	0/+	0/+	+	0	0	0/+	0/+	0	+	+	+	++	0	+
Heritage	--	0	-	0/-	-	-	0	-	0	0	0	0	-	0	0	0	0	--	0	0	0	0	0	0	0	?	-	0	0	0	0	0	0	-/-	
Housing	0	0	++	++	0	0	+	++	0	0	+	0	0	0	0	?	++/ ?	++/ +++	0	+	+	0/+	0	+	+/+ +	+	++/ +++	0	++	+	+	+	0	++/ +++	
Land use	0/-	+	+	+	+	+	+	+	+	+	+	-/-	-/-	0	0/+	0/-	+	--	+	+	-/-	-	0	-	-	0	-/-	+	+	+	0	-	0	0	
Landscape	0/-	0	0/+	0/?	0/?	0/?	0	0/?	0	0	0/?	-	-	0/-	0	0/-	0/?	--	0/?	0	0	0	0	0/-	0/-	0	-	0	0	0	0	0	0/-	0	-
Noise	0/-	0/-	-	-	0/-	0/-	0/-	-	0/-	0	-	0/-	0/-	0/-	0/-	-/?	-	-/-	-	-	0/-	0	0/-	-	0/-	0	0/-	0	-	0/-	0/-	0/-	0	-	
Resources	?/- -	0/?	0/?	?	?	?	+++/ ?	+/?	++/ ?	0	?	0/?	+++/ ?	0/?	0/?	?	---/ ?	0/?	?	?	---	?	0	0	-/?	-/?	0/?	0/?	0/?	0/?	?	--/?	0/?	0	?
Services & Facilities	+	0/+	+++	+++	+	++/ +++	++/ +++	++/ +++	0	0	++/ +++	0	0	+	+	++	++/ +++	++	++/ +++	++/ +++	++	++	+++	+	+	++	++	+++	++	++/ +++	++	++	0	++/ +++	
Travel	+	+	+/+ +	+/+ +	+	+	+	+/+ +	+	+	+/+ +	0/+	0/+	0/+	0/+	+	+/+ +	+/+ +	+	+/+ +	+	0	+	+/+ +	+/+ +	+	+	+	++/ +++	+	+/+ +	+	++	++	
Waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Water	0	0	0	0	0/+	0/+	0	0	0	0	0	0	0	0/+	0	0/+	0	?	0	0	0/+	0	0	0	0	0	0/-	0	?	0	0	0	0	0	-
Commentary	Development proposed in Royal Tunbridge Wells is largely sustainable with more than half of objectives scored as positive or neutral (STR/SO 1). Scores for environmental objectives range from -- to 0. The air quality objective scores as mixed overall due to the likelihood that some of the development in Royal Tunbridge Wells will increase traffic in the AQMA, whilst at the same time bring financial contributions for improvements and being served by a wide range of facilities and service so that private car use is not essential. Noise and water are scored slightly negative to reflect the collective impact of all proposed development. Economic and social objectives for STR/RTW 1 are all positive and mostly highly positive. Further commentary can be found in Appendix E.																																		

Southborough

Table 22. List of reasonable alternative sites in Southborough

Site Ref	Site Address	Policy Ref
8	Wheelers Field, Powder Mill Lane, Southborough	Not allocated
10	The Piggery, Powder Mill Lane, Southborough	Not allocated
45	Land adjoining Birchwood Avenue/Dower House Crescent, Southborough	Not allocated
90	Mabledon, London Road, Southborough, TN4 0UH	AL/SO 4
232	Land at Bright Ridge, and Speldhurst Road (former Speldhurst Road allotments), Southborough	AL/SO 2
233	Land to the rear of Hornbeam Avenue and Walnut Way, Southborough	Not allocated
234	Southborough Hub, London Road, Southborough, TN4 0ND	AL/SO 1
327	Land at Blackthorn Avenue, Royal Tunbridge Wells	Not allocated
335	Land to the north of Speldhurst Road & to the west of Bright Ridge, Southborough	Not allocated
441	Southfields Park, St John's Road, Southborough	Not allocated
445	Mabledon and Nightingale east of A26 and south of the A21, Southborough	AL/SO 3

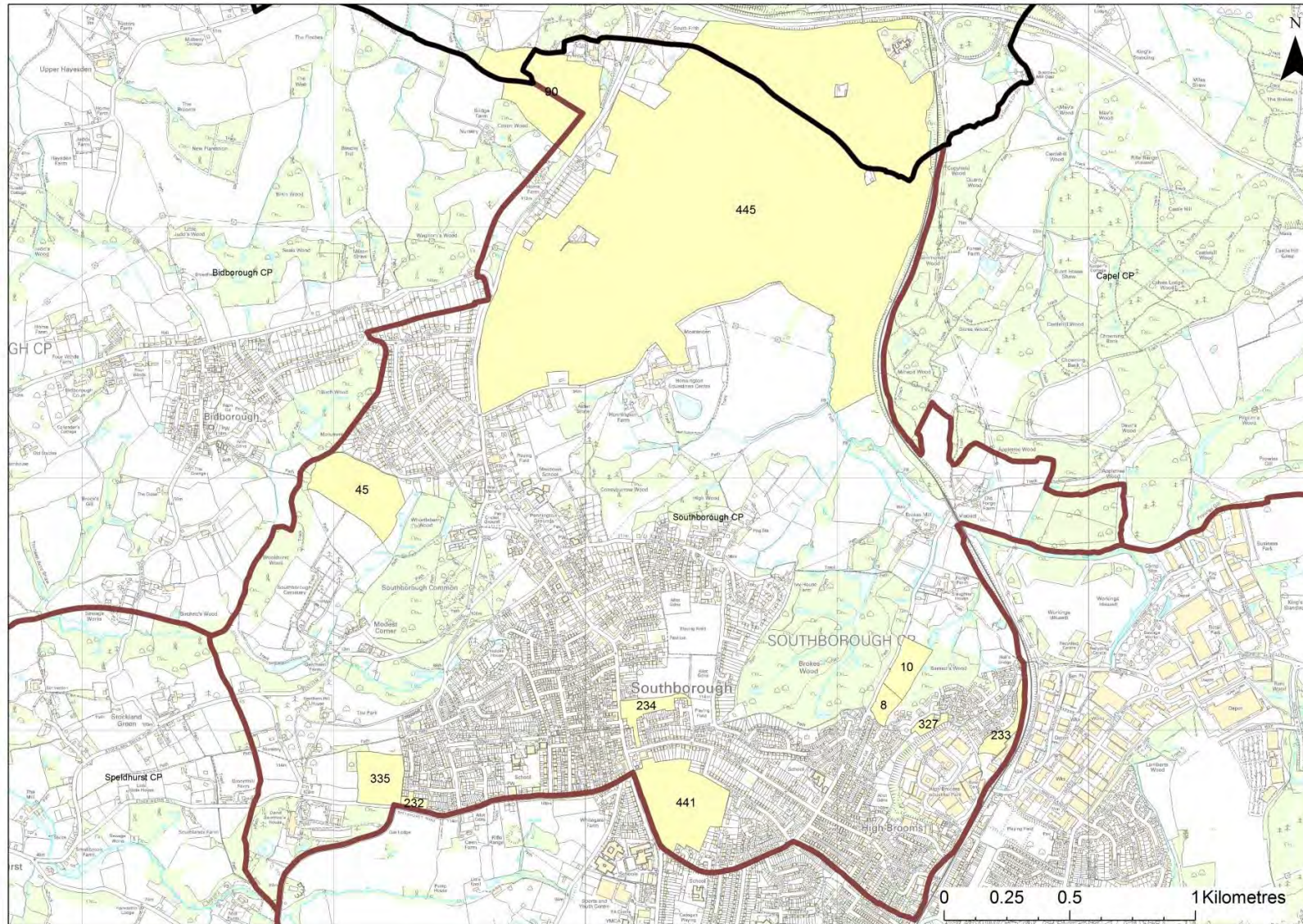


Figure 9. Map of reasonable alternative sites within Southborough.

Table 23. SA scores for allocated sites in Southborough

Sustainability Objective	Score				
	AL/SO 1	AL/SO 2	AL/SO 3	AL/SO 4	STR/SO 1 (cumulative)
Air	?	?	-	0 / -	?
Biodiversity	0	0	0 / -	0 / +	0
Business Growth	++	0	++ / +++	+	+++
Climate Change	0	0	0 / -	? / -	0 / -
Deprivation	+	0	0	0	0 / +
Education	+	+	+	0	0 / +
Employment	++	+	++	++	+++
Equality	++ / +++	0	-	0	+
Health	+	+	+	++	++
Heritage	0	0	++	++	++ / +++
Housing	++	+	+ / ++	0	++
Land use	0 / +	-	0 / +	0 / -	0
Landscape	0 / +	0 / -	++	0 / -	+
Noise	-	0 / -	-	0 / -	-
Resources	0 / ?	0 / ?	?	?	?
Services & Facilities	++	+	0 / -	0 / +	++
Travel	++	+ / ++	+	+	++
Waste	0	0	0	0	0
Water	0	0 / +	0 / -	0	0 / -
Commentary	<p>Development proposed in this parish (STR/SO 1) is largely sustainable with mostly positive or neutral scores.</p> <p>Scores for environmental objectives are all neutral or positive apart from noise, air and water. The air quality objective scores as mixed overall due to the likelihood that most development in Southborough will increase traffic in the AQMA, whilst at the same time bring financial contributions for improvements and being served by a wide range of facilities and service so that private car use is not essential. Noise and water are scored slightly negative to reflect the collective impact of all proposed development.</p> <p>All economic and social objectives are positive.</p> <p>More detailed commentary can be found in Appendix F.</p>				

Capel (including Tudeley Village)

Table 24. List of reasonable alternative sites in Capel Parish

Site Ref	Site Address	Policy Ref
11	Land at and to the rear of 50 Whetsted Road, Five Oak Green, TN12 6RT	Not allocated
48	Bramley House, Five Oak Green Road, Five Oak Green TN12 6TJ	Not allocated
141	Site south of Badsell Road, Paddock Wood, TN12 6QR.	AL/PW 1
142	Land to the north of Badsell Road, Five Oak Green, TN12 6QR	AL/PW 1
143	Land at Tolhurst Road, Five Oak Green	Not allocated
183	Tanners Farm, Church Lane, Capel	Not allocated
216	Land at Moat Farm, Whetstead Road, Five Oak Green	Not allocated
307	Land to the north of Badsell Road, Five Oak Green	Not allocated
309	Land to the east of Maidstone Road, Five Oak Green, Kent	AL/PW 1
310	Land at Whetsted Farm, Maidstone Road, Five Oak Green, Kent	AL/PW 1
311	Land at Sebastopol, Whetsted Road, Five Oak Green, Kent	AL/PW 1
312	Land at Whetsted Wood, Maidstone Road, Five Oak Green, Kent	AL/PW 1
314	Land south of Whetsted Road, Paddock Wood, Kent	AL/PW 1
317	Tudeley Brook Farm, Whetsted Road, Paddock Wood, Kent	AL/PW 1
329	School field, Finches Farm, Five Oak Green, Tonbridge	Not allocated
330	Finches Farm, Five Oak Green, Tonbridge	Not allocated
331	Forstal Field, Finches Farm, Five Oak Green, Tonbridge	Not allocated
387	Capel Grange Lodge, Badsell Road, Five Oak Green	Not allocated
387	Capel Grange Lodge Badsell Road Five Oak Green Kent	Not allocated
440	The Old Vicarage, Five Oak Green Road, Tudeley, Tonbridge, Kent	Not allocated
446	Land at Tudeley, Tudeley	Not allocated
447	Land to the east of Tonbridge/west of site for Tudeley Village	AL/CA 2
448	Land at Tudeley, Tudeley	AL/CA 1
450	Parcel 1 Land west of Five Oak Green and south of Five Oak Green Road, Capel, Tonbridge	Not allocated
451	Parcel 2 Land west of Five Oak Green and south of Five Oak Green Road, Capel, Tonbridge	Not allocated
452	Land South of Tudeley Road, Tudeley, Tonbridge, Kent	Not allocated
453	Land off Hartlake Road, Tudeley, Tonbridge, Kent	Not allocated
454	Land to the east of Tonbridge/west of site for Tudeley Village	AL/CA 2
AS_10	Orchard Brook, Five Oak Green Road, Five Oak Green, Tonbridge	Not allocated
AS_12	Land on the south side of Five Oak Green Road, Five Oak Green, Tonbridge	Not allocated
AS_29	Land at Sychem Lane, Five Oak Green	Not allocated
CHB_1	Colts Hill Bypass	TP 6

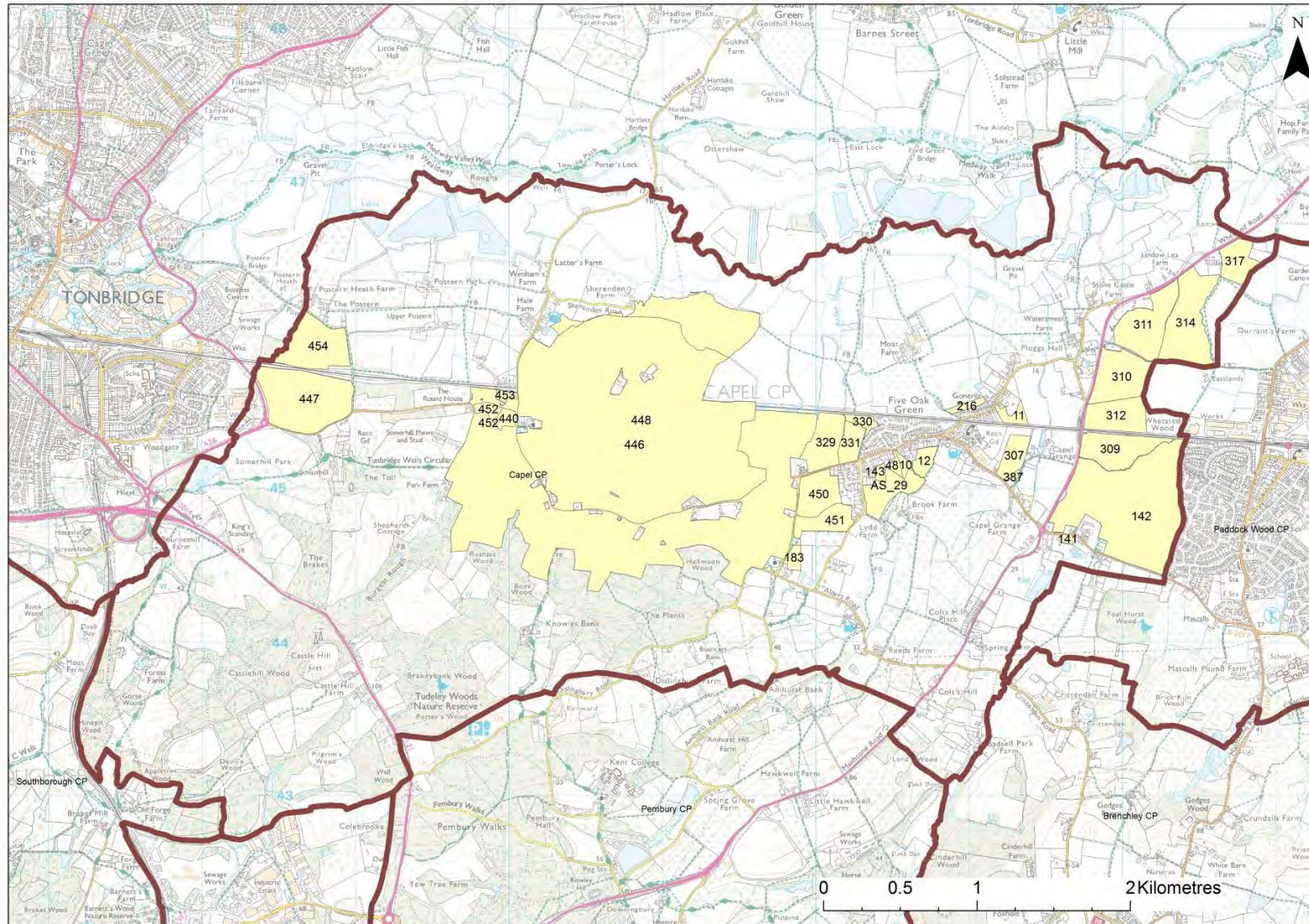


Figure 10. Map of reasonable alternative sites within Capel Parish.
Also see Figure 11 for a map of neighbouring sites in Paddock Wood that form part of the urban extension.

Table 25. SA scores for allocated sites in Capel Parish

Sustainability Objective	Score				
	AL/CA 1	AL/CA 2	TP 6	AL/CA 3 (AL/PW 1)	STR/CA 1 (cumulative)
Air	?	0 / -	0 / +	?	?
Biodiversity	0 / -	0 / -	0 / -	0 / +	0 / -
Business Growth	+	0	0	+ / ++	+
Climate Change	-	0 / ?	?	- / --	-
Deprivation	+	0	0	+ / ++	+
Education	+ / ++	+++	0	+ / ++	++
Employment	++	++	+	++	++ / +++
Equality	++ / +++	++	0	++	+ / ++
Health	++	0	0	++	++
Heritage	-	0	-	-	-
Housing	+++	0	0	+++	+++
Land use	-- / ---	--	--	-- / ---	-- / ---
Landscape	--	- / --	--	-	--
Noise	- / --	0 / -	0 / +	- / --	--
Resources	0 / +	0 / ?	0 / ?	0 / +	0 / +
Services & Facilities	+++	0	0	++	++ / +++
Travel	++	0 / +	+ / ++	+	++
Waste	0	0	0	0	0
Water	++ / ?	0	0	++ / ?	++ / ?
Commentary	<p>Most scores for STR/CA 1 are positive with very positive scores being applied for the social and economic objectives. Environmental objectives are mostly negative reflecting the scale of development proposed. However, the water objective has been given a mixed/positive score to reflect the betterment in flooding proposed for Five Oak Green and Paddock Wood. The scale of Policy AL/CA 1 (and AL/CA 5) in comparison to the other allocations, dominates the assessment of cumulative effects for this parish.</p> <p>NOTE: The majority of AL/CA 3 is within Paddock Wood parish. However, there is some overlap with Capel and thus it is included in this assessment too. This allocation policy is identical to AL/PW 1.</p> <p>Further commentary can be found in Appendix G.</p>				

Paddock Wood

Table 26. List of reasonable alternative sites in Paddock Wood Parish

Site Ref	Site Address	Policy Ref
20	Land at Knells Farm, Queen Street, Paddock Wood	AL/PW 1
47	Ledgers Works, Queen Street, Paddock Wood TN12 6NN	AL/PW 1
51	Land West of Maidstone Road and north of Eldon Way, Paddock Wood	AL/PW 1
79	Land at Church Farm, Church Road, Paddock Wood	AL/PW 1
212	Land to the north of Chantlers Hill, Paddock Wood	AL/PW 1
218	Land at Little Rhoden Farm, Lucks Lane, Paddock Wood, TN12 6PA	AL/PW 1
228	Land adjacent and field to the south of Wayside Cottage, Pearson's Green Road, Brenchley	Not allocated
272	Wesley Centre and Land at Commercial Road / Old Kent Road, Paddock Wood TN12 6DS	AL/PW 2
273	Commercial Road East Car Park, Paddock Wood	Not allocated
274	Land at Goldings / Badsell Road, Paddock Wood	Not allocated
275	Commercial Road West Car Park	Not allocated
276	Land at Dowding House, Commercial Road, Paddock Wood	AL/PW 2
313	Land at Eastlands, Paddock Wood	AL/PW 1
315	Land at Eastland Cottages, Maidstone Road, Paddock Wood	AL/PW 1
316	Land to the south of Tudeley Brook Farm, Paddock Wood	AL/PW 1
318	Land to the north of Durrant's Farm, Maidstone Road, Paddock Wood	AL/PW 1
319	Land adjacent to Leys Cottages, Maidstone Road, Paddock Wood	AL/PW 1
340	Kerylands Sale Field, Lucks Lane, Paddock Wood	AL/PW 1
342	Land north of Chantlers Hill, Paddock Wood	AL/PW 1
344	Land to the east of Mascalls Court Road, Paddock Wood	AL/PW 1
347	Swatlands Farm, Lucks Lane, Paddock Wood, Tonbridge	AL/PW 1
371	Land to the north of Mascalls Court Road, Paddock Wood	AL/PW 1
372	Rhoden Yard, Lucks Lane, Paddock Wood	Not allocated
374	Land to the north of Church Road and adjacent to Queen Street	AL/PW 1
376	Land to the south of Mascalls Court Lane, Paddock Wood	AL/PW 1
402	Land west of Maidstone Road and north of Eldon Way, Paddock Wood	AL/PW 1
AS_26	Park Farm, Queen Street, Paddock Wood	AL/PW 1
AS_48	Elm Tree, Mile Oak Road, Paddock Wood	AL/PW 1
AS_52	Land at Mascalls Farm (plus adjacent land)	AL/PW 3
EA_TC	Paddock Wood Town Centre	AL/PW 2
MF_1	Land at the Memorial Field, west of Maidstone Road	AL/PW 4

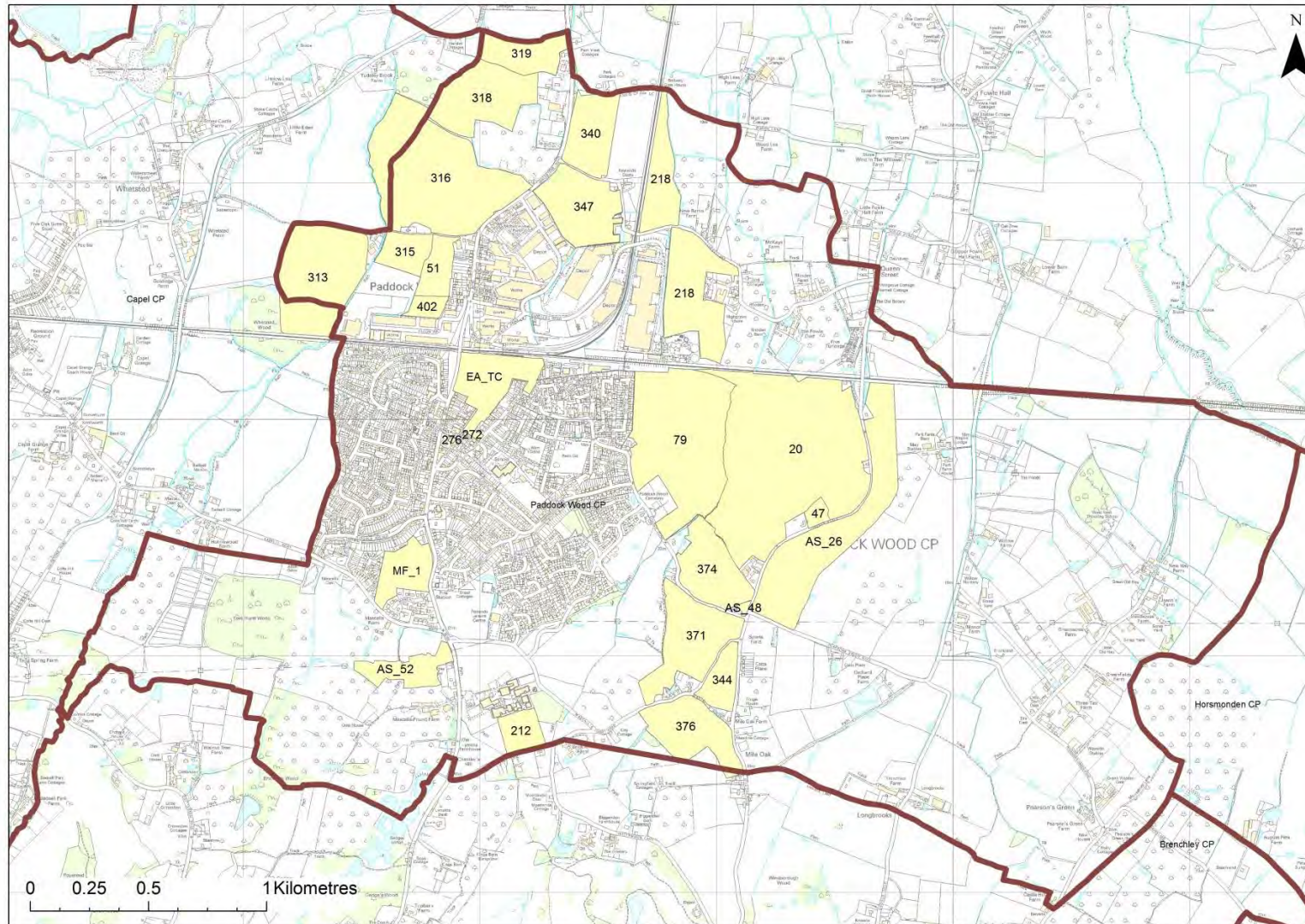


Figure 11. Map of reasonable alternative sites within Paddock Wood Parish.
Also, see Figure 10 for a map of neighbouring sites in Capel that form part of the urban extension.

Table 27. SA scores for allocated sites in Paddock Wood Parish

Sustainability Objective	Score				
	AL/PW 1 (AL/ CA 3)	AL/PW 2	AL/PW 3	AL/PW 4	STR/PW 1 (cumulative)
Air	?	+	0 / -	0 / +	?
Biodiversity	0 / +	0	0 / -	0	0 / +
Business Growth	+ / ++	++ / +++	0	0	++ / +++
Climate Change	- / --	? / -	? / --	0	--
Deprivation	+ / ++	+ / ++	0	+	++
Education	+ / ++	+	+	+	++
Employment	++	++	+	+	++ / +++
Equality	++	+	+	+	++
Health	++	0 / +	+	0 / +	++ / +++
Heritage	-	0	-	0	- / --
Housing	+++	0 / +	++ / +++	0	+++
Land use	-- / ---	+	--	- / --	--
Landscape	-	0 / +	- / --	0 / -	- / --
Noise	- / --	0	0 / -	0	- / --
Resources	0 / +	?	0 / ?	0 / ?	0 / +
Services & Facilities	++	++	+ / ++	0	++
Travel	+	++ / +++	+	+ / ++	++
Waste	0	0	0	0	0
Water	++ / ?	0 / +	0	0	++ / ?
Commentary	<p>Most scores for STR/PW 1 are positive with very positive scores being applied for all the social and economic objectives. Environmental objectives are mostly negative reflecting the scale of development proposed. However, the water objective has been given a mixed/positive score to reflect the betterment in flooding proposed for Five Oak Green and Paddock Wood. Likewise, biodiversity is scored as slightly positive overall to reflect the large improvements that can be made with AL/PW 1.</p> <p>The majority of AL/CA 3 is within Paddock Wood parish. However, there is some overlap with Capel and thus it is included in this assessment too. This allocation policy is identical to AL/PW 1. The scale of Policy AL/CA 1 (and AL/CA 5) in comparison to the other allocations, dominates the assessment of cumulative effects for this parish.</p> <p>Further commentary can be found in Appendix H.</p>				

Cranbrook and Sissinghurst

Table 28. List of reasonable alternative sites in Cranbrook and Sissinghurst Parish

Site Ref	Site Address	Policy Ref
25	Land to the west of Frythe Way and east of Freight Lane, Cranbrook	Not allocated
29	PART SITE: Land at Boycourt Orchards, A229 Angley Road, Wisley Pound, Cranbrook TN17 2HR	AL/CRS 16
54	Land on the east side of Mill Lane, Sissinghurst, TN17 2HX	AL/CRS 12
59	Gate Farm, adjacent to Hartley Road and Glassenbury Road, Hartley, Cranbrook, TN17 2ST.	AL/CRS 6
68	Land at junction of Common Road and Frittenden Road, Sissinghurst.	AL/CRS 17
70	Land south west of Campion Crescent at Hartley, Cranbrook.	AL/CRS 6
71	Land adjoining Cranbrook Primary School, Off Quaker Lane, Cranbrook,	AL/CRS 5

Site Ref	Site Address	Policy Ref
	TN17 3JZ: Site B.	
92	Land south of Grove Cottage, Tilsden Lane, Cranbrook TN17 3PJ	Not allocated
110	Land to the west of Co-operative, High Street, Cranbrook TN17 3DQ	Not allocated
120	Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road, Sissinghurst	AL/CRS 13
122	Gate Farmland at Charity Farm, Swattenden Lane, Cranbrook TN17 3PS	Not allocated
125	Land adjoining Wilsley Farm, adjacent to Angley Road and Whitewell Lane, Cranbrook, TN17 2LE	AL/CRS 1 (part site)
128	Scott Field, Main Campus, Cranbrook School, adjacent to Bakers Cross, Cranbrook.	AL/CRS 10
129	Big Side Playing Field adjacent to Quaker Lane and Waterloo Road, Cranbrook	AL/CRS 2
130	Cranbrook School Main Campus, Waterloo Road, Cranbrook TN17 3JD	AL/CRS 10
131	Jaegers Field, Angley Road, Cranbrook	AL/CRS 3
132	Rammell Field, Bakers Cross, Cranbrook	Not allocated
133	Land adjoining Cranbrook Primary School, Quaker Lane Cranbrook	AL/CRS 5
159	Land south of The Street, Sissinghurst	AL/CRS 14
188	Land adjacent to Hartley Dyke, Cranbrook	Not allocated
271	Land at Crane Lane including WC block and Wilkes Field, Cranbrook (plus additional land)	AL/CRS 8
292	Land adjacent to Crane Valley	AL/CRS 9
296	Oak Tree Farm, The Common, Wilsey Pound, Cranbrook	AL/CRS 15
323	Land adjacent to Hartley Gate Farmhouse Cranbrook Kent	AL/CRS 6
345	Land adjacent Glassenbury Road, Glassenbury Road, Cranbrook Kent	AL/CRS 6
396	Land West of Freight Lane, Cranbrook	AL/CRS 9 (part site)
407	Land at Brooksdan, High Street, Cranbrook	Not allocated
409	The High Weald Academy, Angley Road, Cranbrook	Not allocated
430	Turnden Farm, Hartley Road, Cranbrook	AL/CRS 4
442	Land Adjacent Orchard Cottage, Frittenden Road, Sissinghurst	AL/CRS 17
AS_6	Part OS Plot 2429 Common Road, Sissinghurst, Cranbrook	Not allocated
AS_14	See 59.	See 59.
AS_30	Pinecroft, Frittenden Road, Sissinghurst, TN17 2AQ	Not allocated
AS_32	Land off Golford Road, Cranbrook,	AL/CRS 7
AS_37	Glenn House, Hartley Road, Cranbrook. TN17 3QP	Not allocated
AS_53	Land at Bull Farm	AL/CRS 6
AS_51	St Georges Hall Sissinghurst	AL/CRS 14
SC_1	Sissinghurst Castle	AL/CRS 11

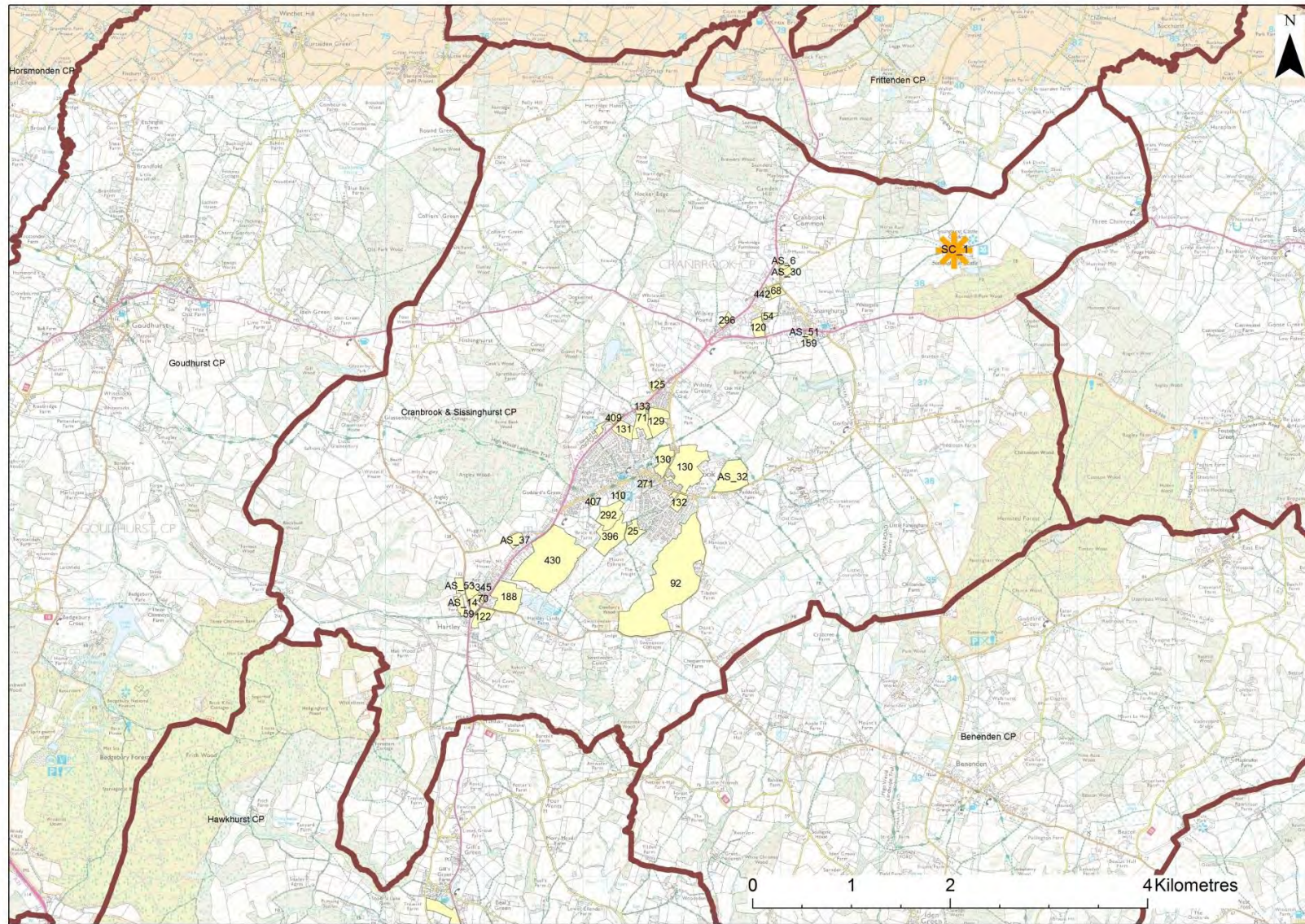


Figure 12. Map of reasonable alternative sites within Cranbrook and Sissinghurst Parish.

Table 29. SA scores for allocated sites in Cranbrook and Sissinghurst Parish

Sustainability Objective	Score																	
	AL/CRS 1	AL/CRS 2	AL/CRS 3	AL/CRS 4	AL/CRS 5	AL/CRS 6	AL/CRS 7	AL/CRS 8	AL/CRS 9	AL/CRS 10	AL/CRS 11	AL/CRS 12	AL/CRS 13	AL/CRS 14	AL/CRS 15	AL/CRS 16	AL/CRS 17	STR/CRS 1 (cumulative)
Air	0 / -	0	0	0 / -	0	-	0 / -	0 / +	0 / -	?	0 / +	0	0	0	-	-	0	-
Biodiversity	0	0	0	-	0	-	0 / -	0 / -	-	?	+	0	0	0	0	0	0	0 / -
Business Growth	0	0	0	+	0	+	0	0 / +	0	?	0 / +	0	0	0	0	0	0	+ / + +
Climate Change	0	0	0	? / -	0	? / -	? / -	0	-	?	0 / +	0	0	0	0	0	0	? / - -
Deprivation	0	0	0	?	0	?	0	0	0	?	0	0	0	0	0	0	0	? / 0
Education	+	+	+	0 / -	+	0 / +	0 / -	+	0 / -	+++	0	0 / -	0 / -	0 / -	0 / -	0 / -	+++	-
Employment	+	+	+	+	+	++	+	+	+	?	0	+	+	+	+	+	0	++
Equality	0	+	+	+	+	0 / -	+	++	+	- / ?	0 / +	0 / +	0 / +	+ / + +	0 / -	0 / -	0	+
Health	0 / +	0 / +	+	0 / +	+	0 / +	0 / +	+	0 / +	?	0	0 / +	0 / +	0 / +	0 / +	0 / +	0	+
Heritage	-	-	0	- / - -	0 / ?	0 / -	0 / -	-	- -	?	+	0	-	0	?	0	0	-
Housing	0 / +	+	+	++	+	+	++	+ / + +	++ / + + +	?	0	0 / +	0 / +	+	0 / +	0 / +	0	++
Land use	- / - -	- / - -	- / - -	- -	- / - -	- / - -	- -	0 / -	- -	0 / ?	0	- / - -	- / - -	- / - -	- / - -	- / - -	0	- -
Landscape	-	-	-	- - / - - -	-	-	- / - -	- / - -	-	?	+	0 / -	-	-	0 / -	0 / -	0	- -
Noise	0 / -	0	0	-	0 / -	0 / -	0	0	-	?	0	0	0	0	0	0	0	-
Resources	0 / ?	0 / ?	0 / ?	+ / ?	0 / ?	?	0 / ?	+ / ?	0 / ?	?	0	0 / ?	0 / ?	0 / ?	0 / ?	0 / ?	0	0 / ?
Services & Facilities	0 / -	0 / -	0 / -	0 / -	0 / -	-	0 / -	0 / +	0 / -	?	0 / +	-	-	-	-	-	0	-
Travel	0 / -	0	0	-	0	- / - -	0 / -	0	-	?	0 / +	0 / -	0 / -	0	- / - -	- / - -	0	0 / -
Waste	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0
Water	0 / +	0 / +	0 / +	0 / -	0 / +	0	0 / -	0	0 / -	?	0	0	0	0 / +	0 / +	0 / +	0	-
Commentary	Cumulative impacts for this parish are mixed.																	
	Economic and social objectives range from + + to -, reflecting the allocations for business, employment and residential housing whilst also considering the slightly negative scores for provision of, and access to, services and facilities.																	
	Environmental objectives range from 0 to - -, with no positive scores applied. This is indicative of the sensitive environmental features in the parish and relatively large loss of greenfield land.																	
	Further commentary can be found in Appendix I.																	

Hawkhurst

Table 30. List of reasonable alternative sites in Hawkhurst Parish

Site Ref	Site Address	Policy Ref
2	Chittenden Fields, adjacent to High Street and Slip Mill Road, Hawkhurst	Not allocated
17	Land adjacent to High Banks Nursery, Cranbrook Road, Gill's Green	Not allocated
19	Land at Heartenoak Road, Hawkhurst	Not allocated
33	Land south of Woodham Hall, Rye Road, Hawkhurst TN18 5DA	Not allocated
52	Land and property at Streatley, Horns Road, Hawkhurst TN18 4QT	Not allocated
55	March's Field, Lime Grove, Gill's Green TN18 5BD	AL/HA 10
78	Land off Copthall Avenue and Highgate Hill, Hawkhurst (including 419)	AL/HA 6
86	Land at Highgate Hill, Hawkhurst (Phase 2)	Not allocated
102	Hawkhurst Station Business Park, Gill's Green TN18 5BD	AL/HA 8
107	Hawkhurst Place Farm, Rye Road, Hawkhurst TN18 5DA	Not allocated
115	Land forming part of the Hawkhurst Golf Course to the north of High Street, Hawkhurst TN18 4JS	AL/HA 1
167	Land on the north west side of Heartenoak Road, Hawkhurst	Not allocated
201	Land at Sessele House and Marlborough House School, High Street, Hawkhurst TN18 4PY	Not allocated
284	Dee House, Rye Road, Hawkhurst	Not allocated
291	Field at Cranbrook Road, Hawkhurst	Not allocated
334	South west Side of Hearten Oak Lane, Hawkhurst	Not allocated
350	High Banks Garden Centre, Cranbrook Road, Hawkhurst	Not allocated
351	High Banks, Slip Mill Road, Hawkhurst	Not allocated
361	Land at The White House, Highgate Hill, Hawkhurst	AL/HA 2
391	Rear of Limes Grove Oast, Slip Mill Road, Hawkhurst	Not allocated
392	Trewint Farm and Jacks Paddock, Slip Mill Lane, Hawkhurst	Not allocated
394	Land west of Slip Mill Lane at Trewint Farm, Slip Mill Lane, Hawkhurst	Not allocated
413	Land at Fowlers Park, Hawkhurst	AL/HA 4 (part site)
419	Land at Westfield/east of Highgate Hill, Hawkhurst, Kent	AL/HA 6
422	Santer's Yard, Gills Green Farm, Gills Green, Hawkhurst	AL/HA 9
432	Land to the east of Heartenoak Road, Hawkhurst	AL/HA 3 (part site)
433	OS Plot 7007, Cranbrook Road, Hawkhurst	Not allocated
455	Whitewood Farm, White Lane, Hawkhurst	Not allocated
AS_3	Land to the west of Cranbrook Road, Gills Green	Not allocated
BH_1	Brook House, Cranbrook Road, Hawkhurst	AL/HA 5
EA_SP	Site at Sports Pavillion, King George V Playing Fields, The Moor	AL/HA 7

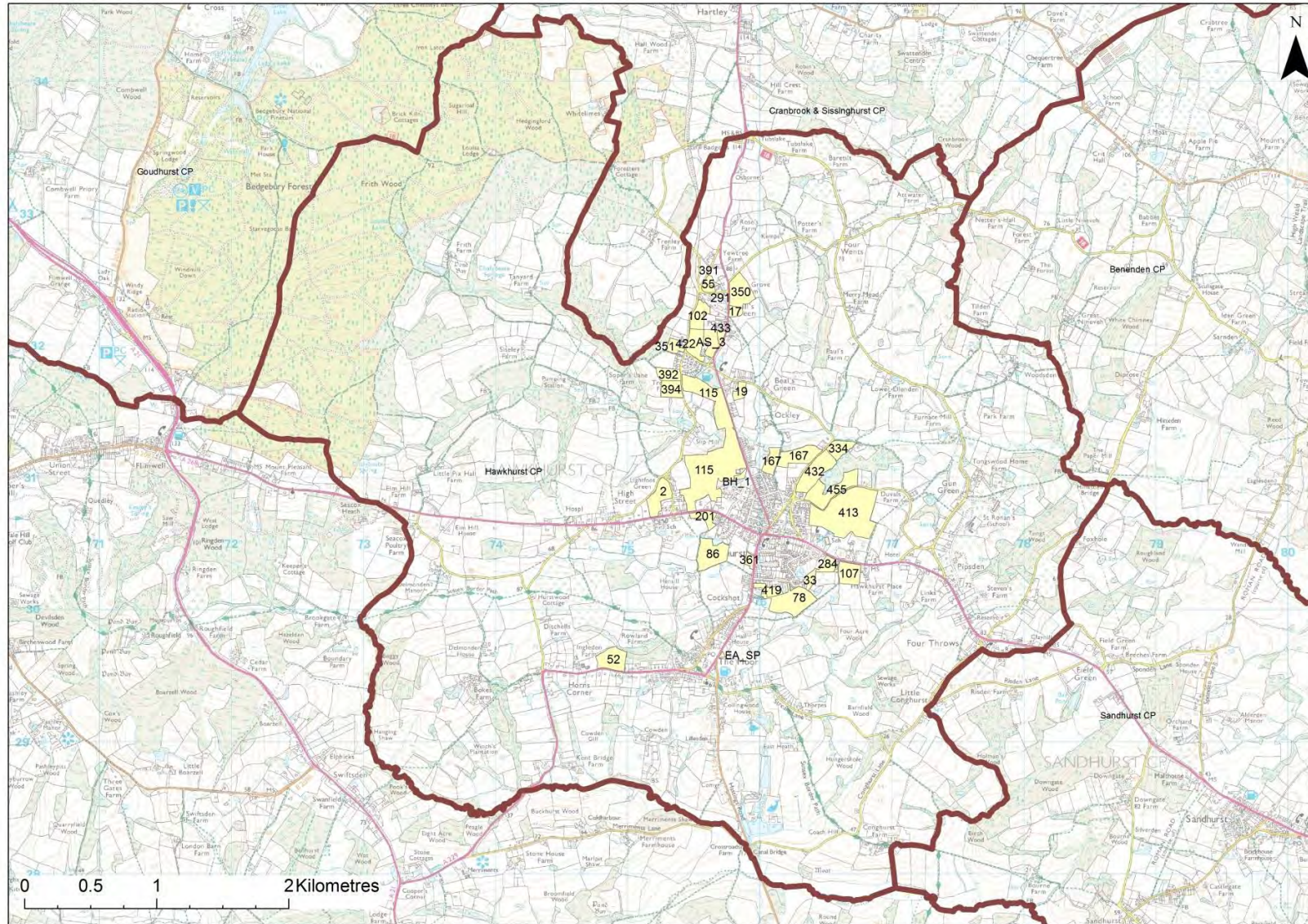


Figure 13. Map of reasonable alternative sites within Hawkhurst Parish.

Table 31. SA scores for allocated sites in Hawkhurst Parish

Sustainability Objective	Score										
	AL/HA 1	AL/HA 2	AL/HA 3	AL/HA 4	AL/HA 5	AL/HA 6	AL/HA 7	AL/HA 8	AL/HA 9	AL/HA 10	STR/HA 1 (cumulative)
Air	+	0	0	0 / -	0	0 / -	0	-	-	-	0 / +
Biodiversity	0	0	0	0	0	0	0	0	0	0	0
Business Growth	0 / ?	0	0	0	0	0	0	+	+	+	++
Climate Change	? / -	0	0	? / -	0	0	0	? / -	? / -	? / -	? / - -
Deprivation	0	0	0	0	0	0	0	?	?	?	0 / ?
Education	0	+	+	++	+	+	0	0	+	0	-
Employment	+	+	+	+	+	+	0	++	++	++	++ / +++
Equality	+	+ / ++	+	? / +	0	0	0	0	-	0	0 / +
Health	0	0	0	0	0	0	0 / +	0	0	0	0 / +
Heritage	-	-	0	-	0	0	0	0	0	0	0 / -
Housing	++	+	+	+ / ++	+	+	0	0	0 / +	0	++
Land use	- / - -	-	-	-	-	-	0	- / - -	- / - -	- / - -	- -
Landscape	- - / - - -	0 / -	0 / -	-	0 / -	-	0	-	-	-	- -
Noise	+	0 / -	0	0	0	0 / -	0	0	0	0	0 / +
Resources	?	?	0 / ?	0 / ?	? / -	? / -	?	0 / ?	? / +	?	?
Services & Facilities	0 / -	0 / +	0 / -	0 / -	0 / -	0 / -	0 / +	0	-	0	0 / -
Travel	0 / +	0	0 / -	-	0 / -	0 / -	0	- / - -	- / - -	- / - -	0 / -
Waste	0	0	0	0	0	0	0	0	0	0	0
Water	0 / -	0	0	0	0	0	0	0 / ?	0 / ?	0 / ?	-
Commentary	<p>All environmental, social and economic objectives have both positive and negative elements to them in this parish thus bring about a very mixed score cumulatively. Collectively, the proposed allocations in this parish represent a significant amount of development in a highly sensitive landscape and a large loss of greenfield land. The allocations also create increased pressures on the climate change and water resource related objectives. However, the cumulative effects on the 3 allocations in Gills Green brings significant benefits to the Business Growth and Employment objectives. Likewise, the combined effect of the residential housing allocations ensures the housing objective scores positively. The benefits that the relief road in Policy AL/HA 1 would bring to the air and noise objectives are negated slightly by the additional traffic that would be created by the cumulative effects of all other sites being developed in the parish. Despite the disadvantages of development at Gills Green, the travel objectives is scored only slightly negative at parish level due to the significant benefit that the relief road and associated large contributions to active travel improvements would bring to the settlement. Water objective is scored as negative to reflect the total scale of development and pressures on supplies.</p> <p>Further commentary can be found in Appendix J.</p>										

Benenden

Table 32. List of reasonable alternative sites in Benenden Parish

Site Ref	Site Address	Policy Ref
35	Land at Walkhurst Road, Benenden	AL/BE 1
158	Land to the rear of Greenacres, The Street, and adjacent to New Pond Road	Not allocated
222	Land on the west side of Iden Green Road, Benenden, TN17 4ES	Not allocated
277	Feoffee Cottages and Land Walkhurst Road, Benenden, Cranbrook	AL/BE 3
424	Land comprising South East Quadrant, Benenden Hospital, Corner of Goddard's Green Road and Green Lane, Benenden, Kent	AL/BE 4
425	Land to the east of Mockbeggar Lane, Benenden, Cranbrook	Not allocated
AS_8	Land south of Chapel Lane, Iden Green, Cranbrook	Not allocated
AS_16	Uphill, New Pond Road, Benenden, Cranbrook	AL/BE 2
AS_21	Little Weavers, Iden Green, Benenden, Cranbrook	Not allocated
AS_40	Land to the south east of Goddard's Green Road	AL/BE 4
AS_41	Land at Benenden Hospital (including site 424 and AS_40)	AL/BE 4

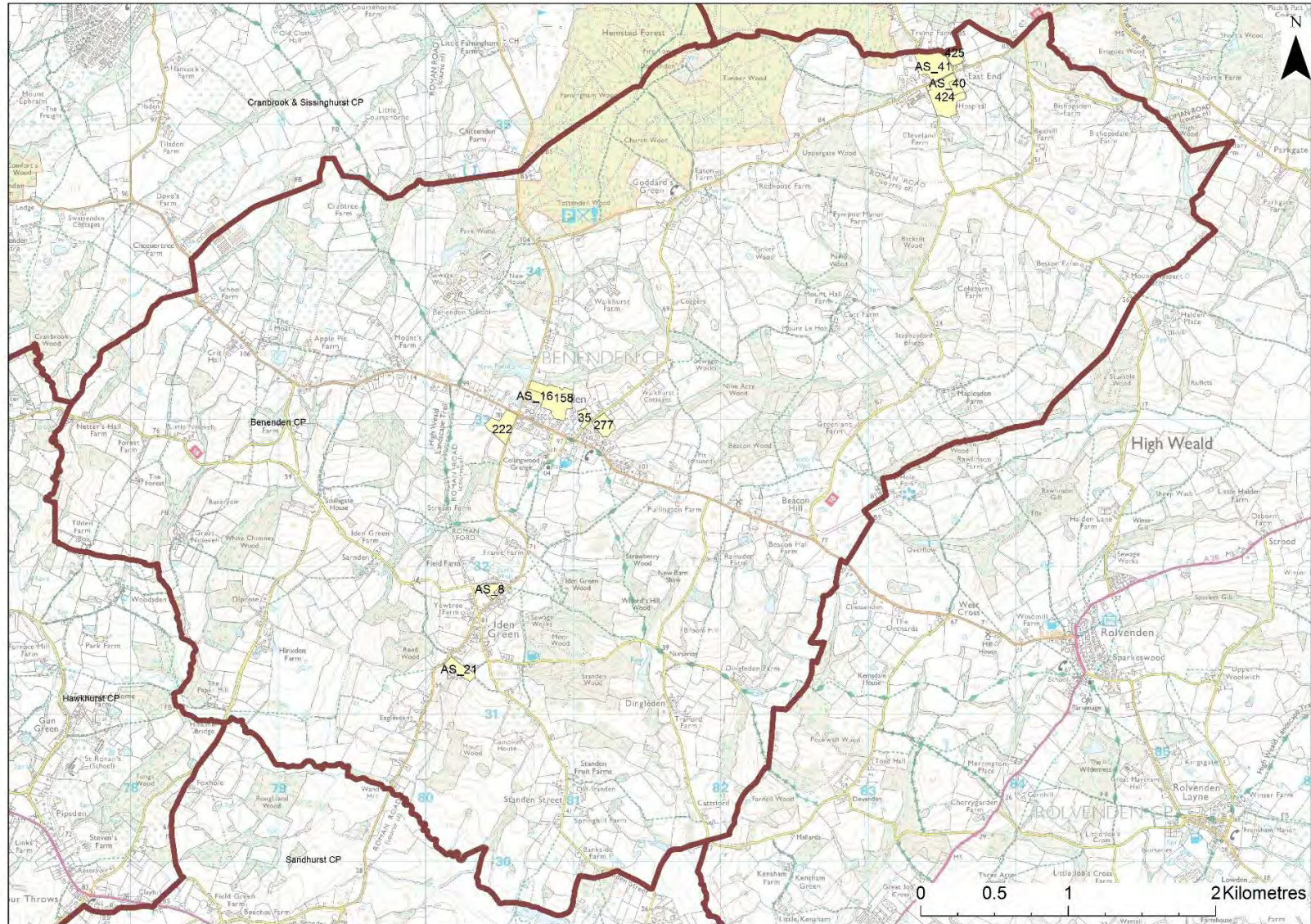


Figure 14. Map of reasonable alternative sites within Benenden Parish.

Table 33. SA scores for allocated sites in Benenden Parish

Sustainability Objective	Score				
	AL/BE 1	AL/BE 2	AL/BE 3	AL/BE 4	STR/BE 1 (cumulative)
Air	0 / -	0 / -	0 / -	-	-
Biodiversity	0	0	0	0 / +	0
Business Growth	0	0	0	0 / +	0 / +
Climate Change	0	0	0	? / -	? / -
Deprivation	0	0	0	0	0
Education	+	+	+	+	+
Employment	+	+	+	+	+
Equality	+	+	+	-	0 / -
Health	0	0	0	0	0
Heritage	-	-	-	0	0 / -
Housing	+	+	+	+	+
Land use	- / - -	- / - -	- / - -	+	0
Landscape	-	-	-	0	-
Noise	0	0	0	0	0
Resources	0 / ?	?	0 / ?	- - / ?	?
Services & Facilities	- / - -	- / - -	- / - -	- - / - - -	- -
Travel	-	-	-	- -	- -
Waste	0	0	0	0	0
Water	0	0	0	0	0 / -
Commentary	<p>Proposed sites are largely reasonable on a cumulative scale. Environmental objectives score as neutral or slightly negative. Social and economic objectives score as positive, neutral and negative.</p> <p>Lack of services, facilities and travel options is a key issue for all development in this settlement and the sites in East End cause the score for Services and Facilities, Climate Change and Travel to be particularly negative overall. However, the education objective does not deteriorate when considering cumulative effects as the schools in Tenterden will be a viable option for residents in East End and thus are likely to take the pressure off Benenden Primary School.</p> <p>Further commentary can be found in Appendix K.</p>				

Bidborough

- 8.2.6 Only one site from Bidborough Parish was submitted in the call for sites process (Land Fronting Penshurst Road). This site was not deemed reasonable and thus an SA was not completed.
- 8.2.7 The Draft Local Plan contains a Strategic Policy for the parish (STR/BI 1). However, lack of information on site locations for windfall means the SA objectives can only be scored as 'unknown'.

Brenchley and Matfield

Table 34. List of reasonable alternative sites in Brenchley and Matfield Parish

Site Ref	Site Address	Policy Ref
18	Matfield House orchards and land, The Green, Matfield TN12 7JT	AL/BM 2 (part site)
34	Walters Farm, High Street, Brenchley TN12 7NU	Not allocated
36	Land fronting Maidstone Road and Chestnut Lane, Matfield	Not allocated
76	Corsica Nursery, Brenchley Road, Matfield TN12 7PT	Not allocated
80	Parsonage Farm, Brenchley Road, Brenchley TN12 7PA	Not allocated
103	Brenchley & Matfield Primary School, Market Heath, Brenchley TN12 7NY	Not allocated
215	Land at Horsmonden Road, adjacent to Church Close, Brenchley	Not allocated
220	Thorn Barn, Maidstone Road, Standings Cross, Matfield	Not allocated
288	Land lying on the west side of Maidstone Road, Matfield, Tonbridge	Not allocated
353	Ashes Plantation, Maidstone Road, Matfield	AL/BM 3
393	Town Farm, Palmers Green Lane, Brenchley, Tonbridge	Not allocated
401	Land at Maidstone Road, Matfield	AL/BM 4
403	Land at Oakfield Road, Matfield	Not allocated
406	Land at Glebe House, Brenchley Road, Brenchley	Not allocated
410	Land at Brenchley Road, Matfield	Not allocated
414	Land north-east of Maidstone Road, Matfield	Not allocated
417	Land to the East of Horsmonden Road, Brenchley	Not allocated
AS_7	Land at Little Puxted, High Street, Brenchley, Tonbridge	Not allocated
AS_27	Land between Brenchley Road, Coppers Lane and Maidstone Rd, Matfield	AL/BM 1
AS_33	Land off of Brenchley Road, Brenchley	Not allocated
AS_34	Land at Market Heath, Brenchley	Not allocated
AS_35	Land to the south of the Memorial Hall, Brenchley	Not allocated
AS_46	Land off Maidstone Road Matfield	Not allocated
AS_47	Land at Friars, Matfield	Not allocated

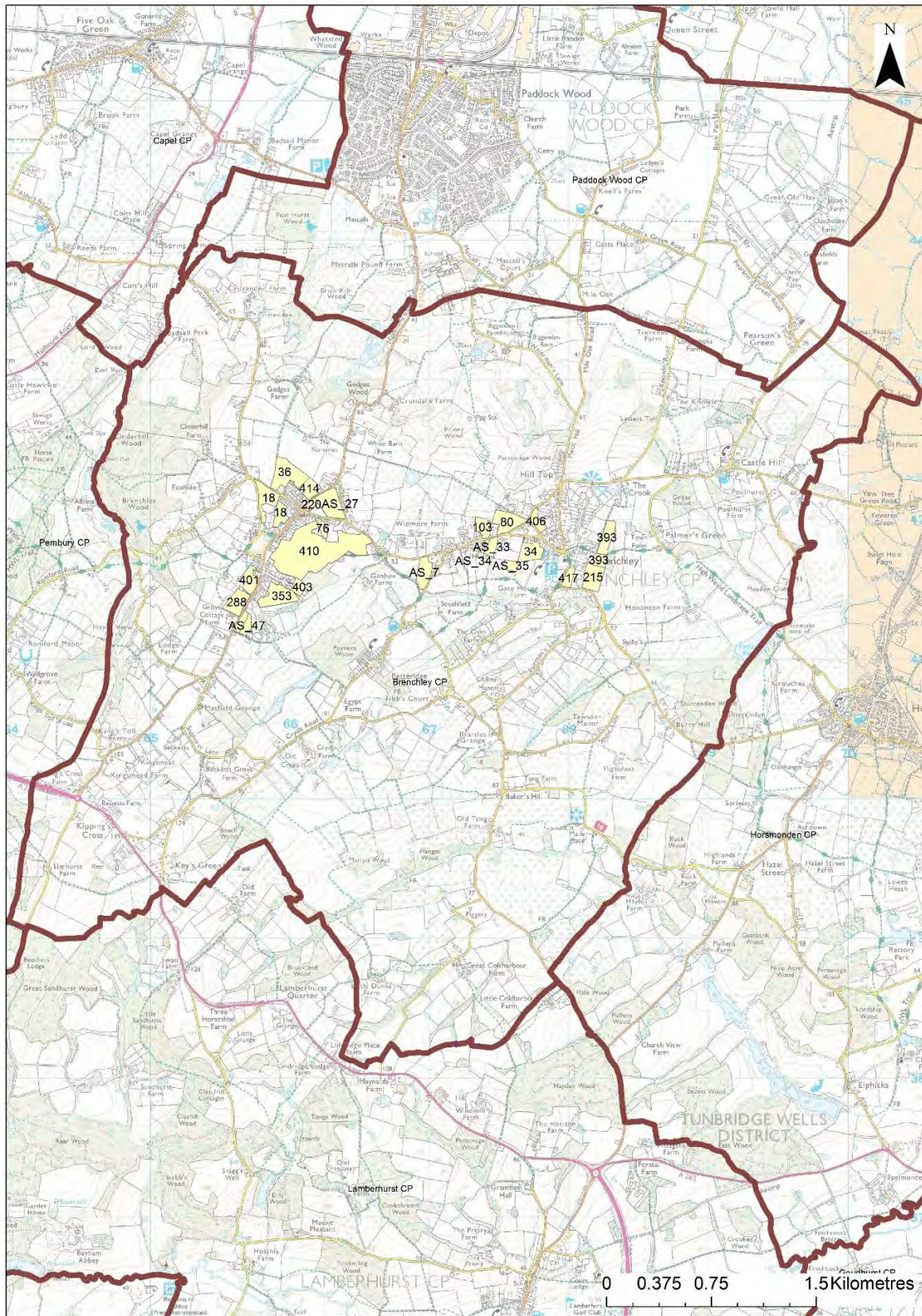


Figure 15. Map of reasonable alternative sites within Brenchley and Matfield Parish.

Table 35. SA for allocated sites in Brenchley and Matfield Parish

Sustainability Objective	Score				
	AL/BM 1	AL/BM 2	AL/BM 3	AL/BM 4	STR/BM 1 (cumulative)
Air	0 / -	0 / -	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	0	0	0 / -
Deprivation	0	0	0	0	0
Education	0 / +	0 / +	0 / +	0 / +	0
Employment	+	+	+	+	+
Equality	0	0	0	0	-
Health	0	0	0	0	0
Heritage	-	0 / -	-	0 / -	-
Housing	0 / +	0 / +	0 / +	0 / +	0 / +
Land use	--	--	--	--	-- / ---
Landscape	- / - -	0 / -	-	0 / -	- / - -
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	?	0 / ?	?
Services & Facilities	- / - -	- / - -	- / - -	- / - -	- / - -
Travel	0 / -	0 / -	0 / -	0 / -	0 / -
Waste	0	0	0	0	0
Water	0	0	0	0	0 / -
Commentary	<p>The cumulative assessment (STR/BM 1) is balanced between 9 neutral or slightly positive scores, and 9 negative scores.</p> <p>Environmental scores are neutral or negative, social scores range from very negative to slightly positive, and economic scores range from positive to negative.</p> <p>The policies in this parish represent a reasonable score for the housing objective. However, the scores are diminished by the fact that Matfield (where most development is proposed) lacks many facilities and services, thus making the housing less suitable for the elderly or disabled. That being said, travel to Paddock Wood is easiest from Matfield and thus there is an advantage in this proposed pattern of growth. The negative biodiversity scores reflect the loss of potential protected species habitat in Policy AL/BM 3 and the negative land use score is due to all policies representing a loss of BMV soils. All sites are within the AONB. Water and education scores reflect the pressures of 141 new dwellings on existing services.</p> <p>Further commentary can be found in Appendix L.</p>				

Frittenden

Table 36. List of reasonable alternative sites in Frittenden Parish

Site Ref	Site Address	Policy Ref
224	The Old Rectory, The Street/Mill Lane, Frittenden, TN17 2DG	Not allocated
349	Pound Hill Field, Biddenden Road, Frittenden	Not allocated
AS_28	Land at Cranbrook Road, Frittenden	AL/FR 1

8.2.8 Three sites came forward in Frittenden parish during the call for sites process but only one of these was allocated for development in the Draft Local Plan (late site 28). The cumulative impact assessment is therefore identical to the scores for this site. See Appendix N for full details on this site.

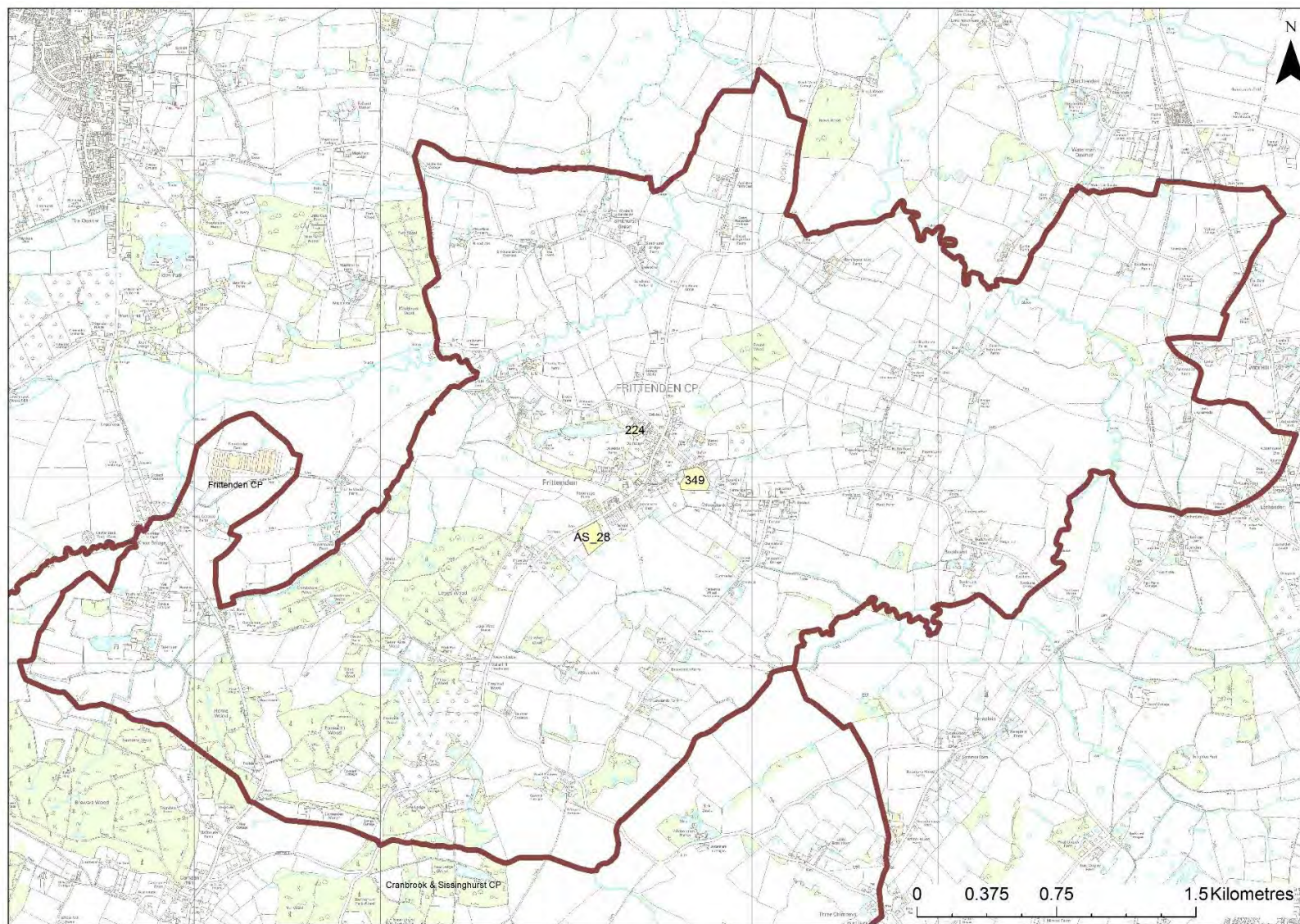


Figure 16. Map of reasonable alternative sites within Frittenden Parish.

Goudhurst

Table 37. List of reasonable alternative sites in Goudhurst Parish

Site Ref	Site Address	Policy Ref
83	Land to the west of Balcombes Hill, Goudhurst, TN17 1AT	Not allocated
124	Land east of Balcombes Hill and adjacent to Maypole Lane TN17 1AE	AL/GO 1
174	Land north of Triggs Farm and west of Paynetts Farm, Cranbrook Road	AL/GO 2
370	Land adjacent to Beechurst and Jarvis Lane, Goudhurst	Not allocated
415	Land off Ladham Lane, Goudhurst	Not allocated

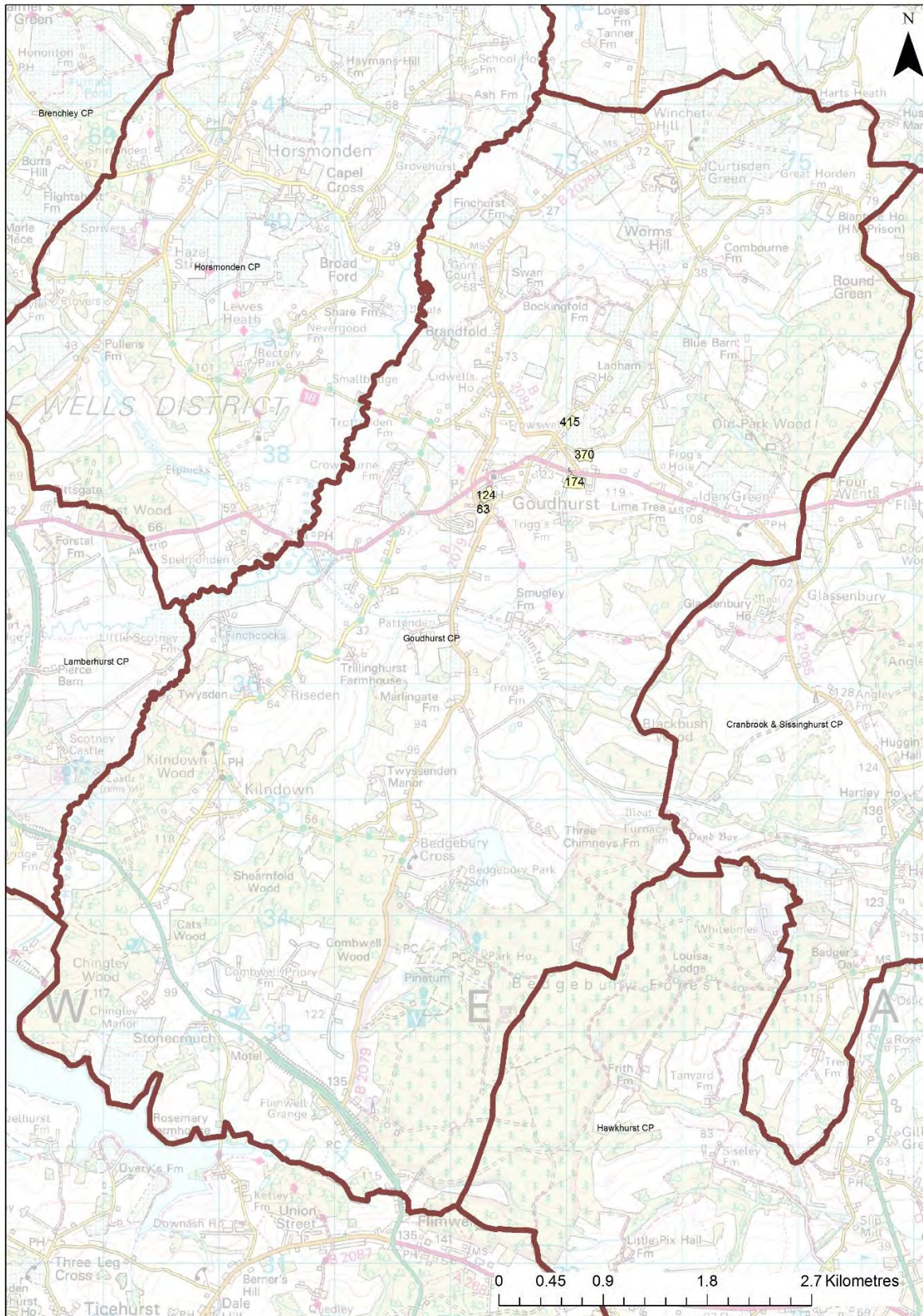


Figure 17. Map of reasonable alternative sites within Goudhurst Parish.

Table 38. SA scores for allocated sites in Goudhurst Parish

Sustainability Objective	Score		
	AL/GO 1	AL/GO 2	STR/GO 1 (cumulative)
Air	0	0	0
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	0 / -	0 / -	0 / -
Employment	+	+	+
Equality	+ / ?	0	0
Health	0	0	0
Heritage	0	0	0
Housing	+ / ?	0 / +	0 / +
Land use	-	-	-
Landscape	0 / -	0 / -	0 / -
Noise	0	0	0
Resources	0 / ?	0 / ?	0 / ?
Services & Facilities	- -	- -	- / - -
Travel	0 / -	0 / -	0 / -
Waste	0	0	0
Water	0	0 / +	0
Commentary	<p>The cumulative impacts of development in this parish (STR/GO 1) are mostly neutral. The objectives for all pillars range from slightly negative to slightly positive except the environmental objectives which have no positive scores. Out of the 10 environmental objectives , 7 score as neutral.</p> <p>Further commentary can be found in Appendix N.</p>		

Horsmonden

Table 39. List of reasonable alternative sites in Horsmonden Parish

Site Ref	Site Address	Policy Ref
31	Land adjacent to Furnace Lane and Gibbett Lane, Horsmonden	AL/HO 1
63	Land west of Maidstone Road and north of Kirkins Close, Horsmonden	AL/HO 2
82	Land adjacent to Bassetts Farm Goudhurst Road, Horsmonden TN12 8AS	AL/HO 4
93	Upper Haymans Farm, Land to the east of Maidstone Road, Horsmonden	Not allocated
96	Land on the north west side of Maidstone Road at Church Meadow	Not allocated
97	Land on the north west side of Maidstone Road and to the south east of Swigs Hole Farm, Horsmonden	Not allocated
108	Old Station Garage, Goudhurst Road, Horsmonden, Kent, TN12 8AD	AL/HO 4
162	Land south of Brenchley Road, Horsmonden	AL/HO 3
207	Land to the rear of Kirkins Close and Willard Place, Horsmonden	Not allocated
297	Bassetts Farm, Goudhurst Road, Horsmonden	AL/HO 4
321	Cottage Paddock, The Cottage, Brenchley Road, Horsmonden	Not allocated
322	Milestone Paddock, Milestone Cottages, Brenchley Road, Horsmonden	Not allocated
324	Land at Bramley Cottage, Back Lane, Horsmonden	AL/HO 4
355	Land adjacent to Goudhurst Road, Horsmonden	Not allocated
377	Land to the north of Brenchley Road, Horsmonden	Not allocated
378	Land to the east of Furnace Lane and Gibbet Lane, Horsmonden	Not allocated
AS_42	Land adjacent to Apple Tree Cottage, Horsmonden	Not allocated

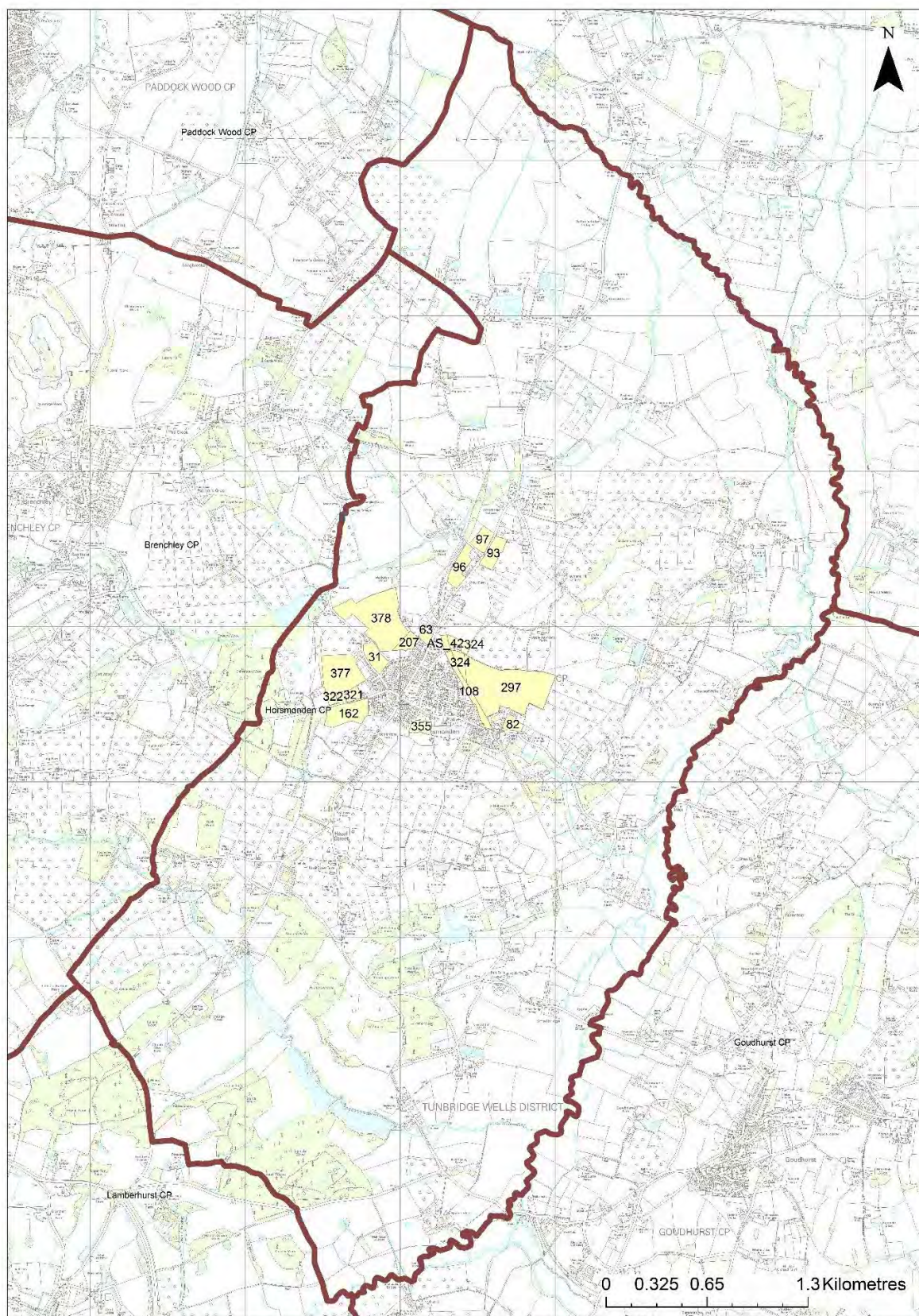


Figure 18. Map of reasonable alternative sites within Horsmonden Parish.

Table 40. SA scores for allocated sites in Horsmonden Parish

Sustainability Objective	Score				
	AL/HO 1	AL/HO 2	AL/HO 3	AL/HO 4	STR/HO 1 (cumulative)
Air	0 / -	0	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0 / +
Climate Change	0	0	? / -	? / - -	? / -
Deprivation	0	0	0	0	0
Education	+	+	+	+	0 / +
Employment	+	+	+	+	+
Equality	+	+	+	+	+
Health	0	0	0	0	0
Heritage	0	0	-	-	-
Housing	+	+	+ / ++	++	++
Land use	--	-	-	--	--
Landscape	0 / -	0	-	-	-
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	--	--	--	--	- / --
Travel	-	0 / -	-	-	-
Waste	0	0	0	0	0
Water	0	0 / +	0	0 / -	-
Commentary	<p>The cumulative impacts of development in this parish (STR/HO 1) are mixed. Economic impacts range from positive to negative. Social impacts all score as positive except health (neutral) and travel (negative). Environmental impacts score as negative to neutral.</p> <p>Further commentary can be found in Appendix O.</p>				

Lamberhurst

Table 41. List of reasonable alternative sites in Lamberhurst Parish

Site Ref	Site Address	Policy Ref
1	Car park for former Slaughterhouse, adjacent to Brewers Street/Hopgarden Close, Lamberhurst	Not allocated
74	Land east of Spray Hill, Pearse Place, Lamberhurst TN3 8EJ	Not allocated
170	Land at Spray Hill, Lamberhurst	Not allocated
279	The ex-vineyard land, Lamberhurst	AL/LA 1
285	Misty Meadow, Furnace Lane, Lamberhurst	AL/LA 2
363	Land at 36 Brewer Street, Lamberhurst	Not allocated
423	Lamberhurst Winery, Lamberhurst Down, Lamberhurst	Not allocated
AS_36	Land at Whisketts Farm, Lamberhurst, TN3 8JG	Not allocated
KC_1	A21 Improvements between Kippings Cross and Lamberhurst	TP 6

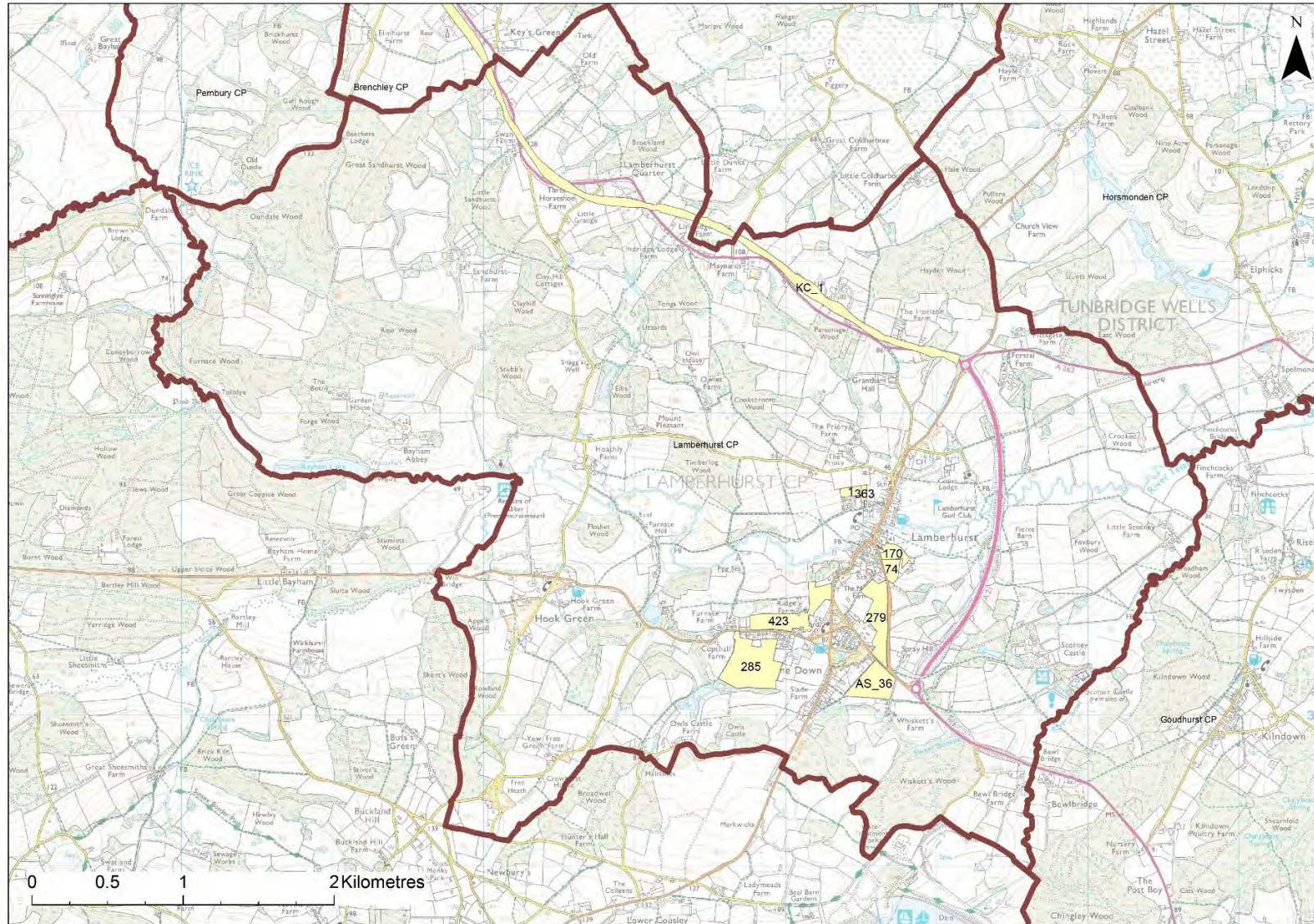


Figure 19. Map of reasonable alternative sites within Lamberhurst Parish.

Table 42. SA scores for allocated sites in Lamberhurst Parish

Sustainability Objective	Score		
	AL/LA 1	AL/LA 2	STR/LA 1 (cumulative)
Air	0 / -	0 / -	0 / -
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	+	+	+
Employment	+	+	+
Equality	0	0	0
Health	0 / +	0	0 / +
Heritage	0	0	0
Housing	+	+	+
Land use	-	-	-
Landscape	-	-	-
Noise	0	0	0
Resources	?	?	?
Services & Facilities	-	- / - -	- / - -
Travel	-	-	-
Waste	0	0	0
Water	0 / +	0	0 / -
Commentary	<p>The cumulative impacts of development in this parish (STR/LA 1) are mixed. Economic impacts range from positive to negative. Social impacts range from negative to positive. Environmental impacts score as negative to neutral.</p> <p>Further commentary can be found in Appendix P.</p>		

Pembury

Table 43. List of reasonable alternative sites in Pembury Parish

Site Ref	Site Address	Policy Ref
28	Land at Woodside Road, Pembury TN2 4BG	Not allocated
44	Land to the south of Camden Avenue, High Street, Pembury TN2 4AA (Part OS 4255)	ALPE 1
50	50A Hubbles Farm and 32 Hastings Road (including adjacent land) TN2 4JP	AL/PE 2
64	Land at Woodside House, Woodside Road, Pembury TN2 4BG	Not allocated
67	Land to the rear of Pembury Village Hall, Pembury	ALPE 1
136	Land at Notcutts Garden Centre, Tonbridge Road, Pembury, TN2 4QN	AL/PE 6
189	Land south of Hastings Road, Pembury	AL/PE 3
190	Land south east of Sandhurst Avenue, Pembury	Not allocated
191	Land north of Henwoods Mount, Pembury	Not allocated
208	Romford House Farm, Kings Toll Road, Pembury, TN2 4BE	Not allocated
241	Land south of Sandhurst Avenue and east of Woodside Road, Pembury	Not allocated
282	Romford House Kings Toll Road, Pembury	Not allocated
290	Abbots, Woodside Close, Pembury	Not allocated
332	Priory Farm, Romford Road, Pembury	Not allocated
354	Stone Court Farm, Stone Court Lane, Pembury	Not allocated
367	Land to the southwest of Woodside House, Woodside Road, Pembury	Not allocated
368	51 High Street Pembury, Kent	AL/PE 1
369	Land to the north of the A21 (Pembury Bypass), to the east of Comford Land, west of Chalket Lane, and south of the High Street, Pembury, Kent	AL/PE 1
373	Land at Downingbury Farm, Pembury	Not allocated
375	Land at Dowingbury Farm, Rowley Hill, Pembury	AL/PE 4
379	Land at Sturgeons fronting Henwood Green Road	AL/PE 5 (part site)
390	30 & 30A Hastings Road, Pembury, Kent	AL/PE 2
395	Woodsgate Corner, Pembury, Tunbridge Wells	AL/PE 7
444	Land to the north of Tunbridge Wells Hospital, Tonbridge Road, Pembury, Tunbridge Wells (including other adjacent land)	AL/PE 6
AS_5	Dayspring Cottage, 55 High Street, Pembury, Tunbridge Wells	ALPE 1
AS_13	Owlsnest Wood, Tonbridge Road, Pembury, Tunbridge Wells	AL/PE 6
CHB_1	Colts Hill Bypass	TP 6

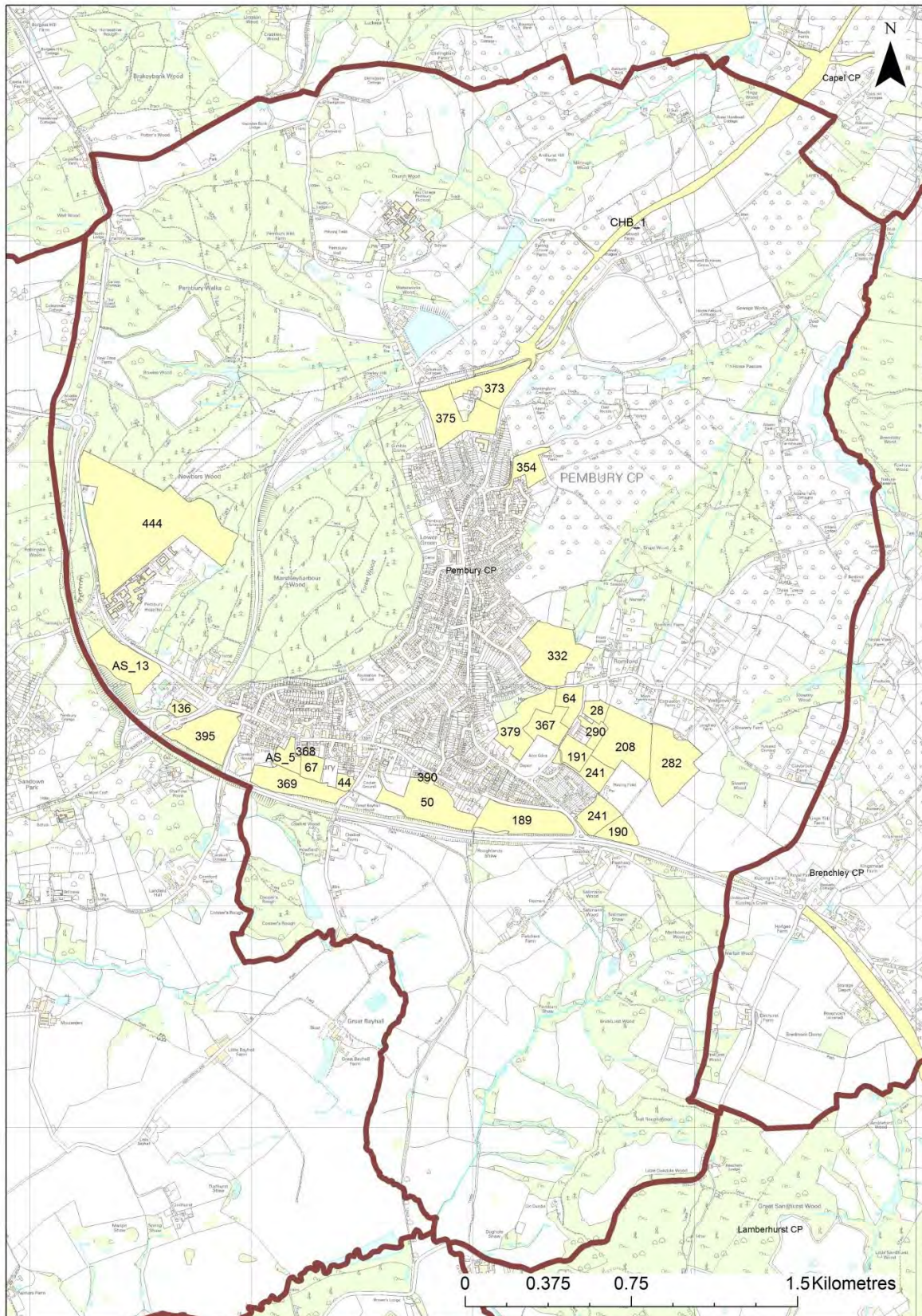


Figure 20. Map of reasonable alternative sites within Pembury Parish.

Table 44. SA scores for allocated sites in Pembury Parish

Sustainability Objective	Score								
	AL/PE 1	AL/PE 2	AL/PE 3	AL/PE 4	AL/PE 5	AL/PE 6	AL/PE 7	TP 6 (A228 link only)	STR/PE 1 (cumulative)
Air	0	0	0	0 / -	0 / -	-	0	0 / +	0 / -
Biodiversity	0	0	0	0	0	-	0	0 / -	0 / -
Business Growth	0	0	0	+	0 / -	+ / ++	0 / +	0	++
Climate Change	? / -	? / -	? / -	? / -	0	? / -	0	?	? / -
Deprivation	0	0	0	0	0	0 / +	0	0	0 / +
Education	+	+	+	+	+	+	0	0	+
Employment	+	+	+	++	+	++	+	+	++
Equality	+	+	+	0 / +	0 / +	+	0	0	+
Health	0	0	0	0 / +	0	+	0	0	0
Heritage	-	-	0 / -	-	0 / -	-	0	-	-
Housing	+ / ++	+ / ++	+ / ++	0 / +	0 / +	+	0	0	++
Land use	- / --	- / --	- / --	- / --	0 / +	- / --	-	--	--
Landscape	-	-	- / --	-	0 / -	--	0	--	--
Noise	-	-	-	0 / -	0	-	0	0 / +	- / --
Resources	- / ?	- / ?	0 / ?	0 / ?	- / ?	?	?	0 / ?	?
Services & Facilities	0 / -	0 / -	0 / -	0 / -	0 / -	0 / -	0	0	-
Travel	0	0	0	-	-	0 / -	0	+ / ++	+
Waste	0	0	0	0	0	0	0	0	0
Water	0	0 / -	0 / -	0 / -	0	0 / -	0	0	-
Commentary	<p>The cumulative impacts of development in this parish (STR/LA 1) are highly mixed. Economic impacts range from ++ to -. Social impacts range from ++ to neutral with no negative scores. Environmental impacts range from 0 to -- with no positive scores.</p> <p>Score for the education objective is combination of the benefits of the provision of a medical education facility (AL/PE 6) and the adverse effects that come from the cumulative pressures that 340 new dwellings places on the existing primary school which does not have room for expansion. Despite the benefits of policy AL/PE 8, the cumulative effects of all the proposed developments has resulted in a slightly negative score overall. The contributions that will be collected from all developments to enhance bus travel prevents this score from being any more negative (likewise the travel objective). The services and facilities score negative overall and is linked to the loss of a local supermarket and relatively poor access to existing services. The water objective is influenced by the groundwater source protection zones across the parish and also the pressure that 340 new dwellings has on supplies.</p> <p>Further commentary can be found in Appendix Q.</p>								

Rusthall

Table 45. List of reasonable alternative sites in Rusthall Parish

Site Ref	Site Address	Policy Ref
22	Dingley Dell, Langton Road, Tunbridge Wells TN4 8XG	Not allocated
60	The Paddocks, Home Farm, 92 Lower Green Road, Rusthall TN4 8TT	Not allocated
146	Tunbridge Wells Golf Club, Langton Road, Tunbridge Wells TN4 8XH	Not allocated
EA_83	Lifestyle Motor Europe, Langton Road	AL/RU 1

- 8.2.9 Three sites came forward in Rusthall parish during the call for sites process but only one of these was allocated for development in the Draft Local Plan (site EA_83). The cumulative impact assessment is therefore identical to the scores for this site. See Appendix R for full details on this site.

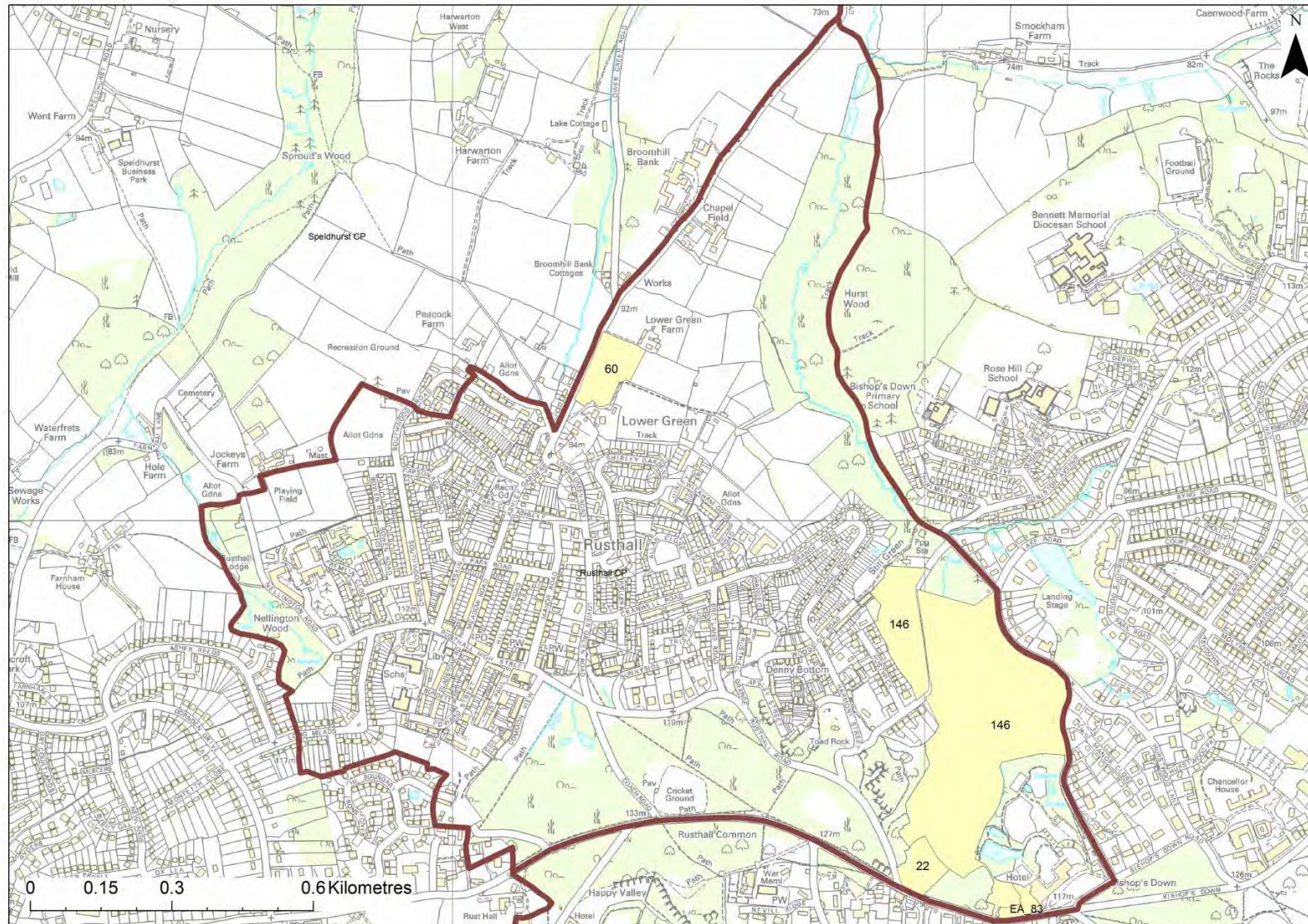


Figure 21. Map of reasonable alternative sites within Rusthall Parish

Sandhurst

Table 46. List of reasonable alternative sites in Sandhurst Parish

Site Ref	Site Address	Policy Ref
147	Land adjacent to Old Orchard and Stream Pit Lane	AL/SA 2
149	Land on the south side of Sayville, Rye Road, Sandhurst, TN18 5JL	AL/SA 1
153	Land parcel at Ringle Green Farm, to the south west of Bodiam Road	Not allocated
227	See 149	See 149
299	Oaklands Farm, Bodiam Road	Not allocated
320	Land at Old Well House, Rye Road	Not allocated
AS_11	Kerrys Yard (New yard) Bodiam Road	Not allocated
AS_50	Land to the rear of Sandhurst Farm Shop, Queen Street	Not allocated

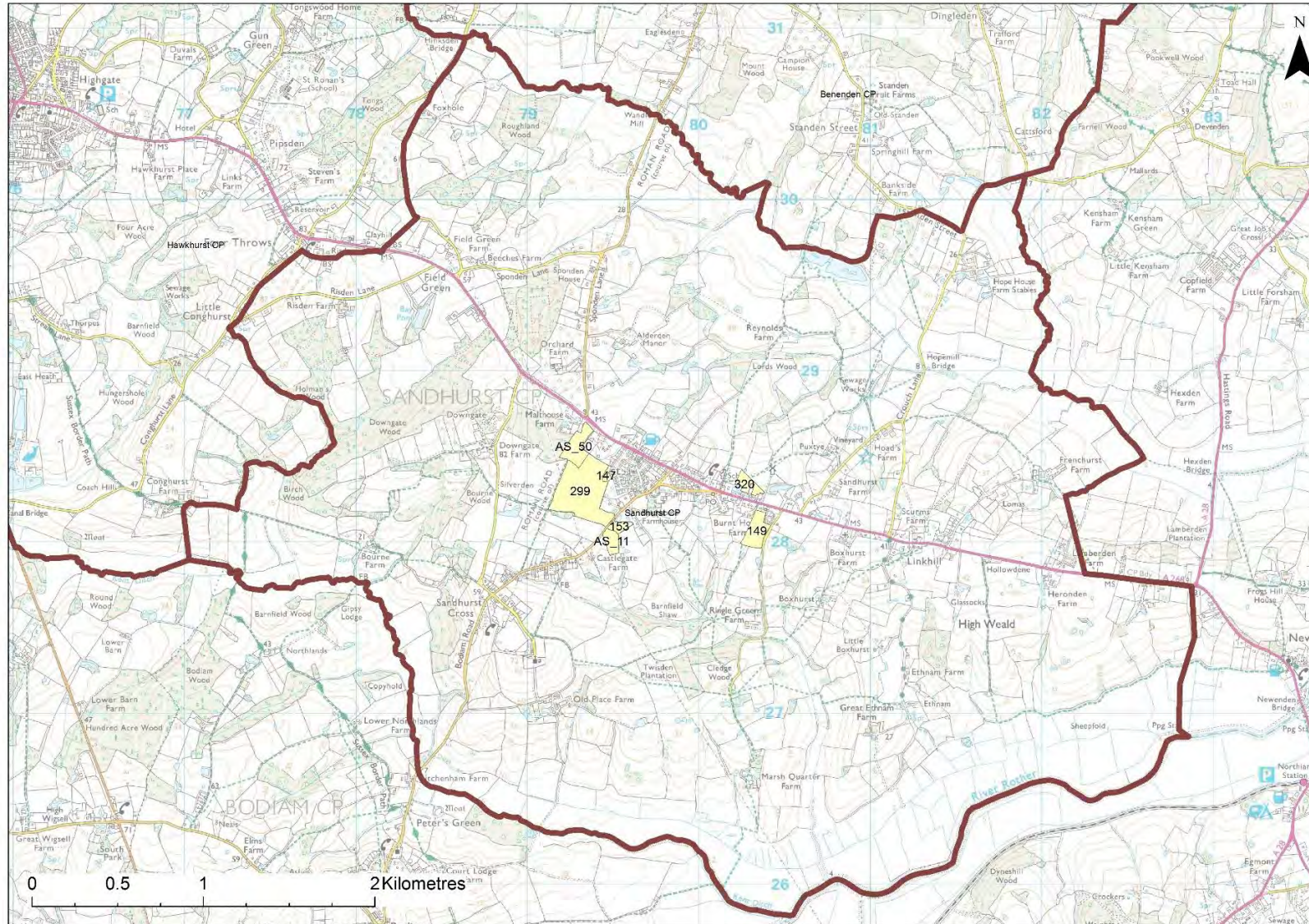


Figure 22. Map of reasonable alternative sites within Sandhurst Parish.

Table 47. SA scores for allocated sites in Sandhurst Parish

Sustainability Objective	Score		
	AL/SA 1	AL/SA 2	STR/SA 1 (cumulative)
Air	0 / -	0 / -	0 / -
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	+	+	+
Employment	+	+	+
Equality	0	0	0
Health	0	0	0
Heritage	-	0	0 / -
Housing	0 / +	0 / +	0 / +
Land use	-	-	-
Landscape	0 / -	0 / -	0 / -
Noise	0	0	0
Resources	0 / ?	0 / ?	0 / ?
Services & Facilities	- / - -	- / - -	- / - -
Travel	- / - -	- / - -	- / - -
Waste	0	0	0
Water	0 / +	0 / +	0 / +
Commentary	<p>The cumulative impacts of development in this parish (STR/SA 1) tend towards neutrality but are mixed overall. Economic and social impacts range from negative to positive. Environmental impacts range from slightly negative to slightly positive.</p> <p>Further commentary can be found in Appendix S.</p>		

Speldhurst

Table 48. List of reasonable alternative sites in Speldhurst Parish

Site Ref	Site Address	Policy Ref
27	1) Land adjacent to the rear of Asher Reeds, and 2) Land adjacent to Cherry Trees, Farnham Lane, Langton Green	Not allocated
42	Land at High View, Langton Road, Langton Green, Tunbridge Wells TN3 0BB	Not allocated
94	Land at Milford House, Penshurst Road, Speldhurst, TN3 0PH	Not allocated
231	Land to the west of Speldhurst Road and south of Ferbies, Speldhurst, TN3 0NS	AL/SP 1
239	Land adjacent to Rusthall recreation ground, Southwood Road, Rusthall	AL/SP 3
337	Allotment land North East of the end of Southwood Road, Rusthall and adjacent to Peacock Farm	Not allocated
338	Land between Ferbies and Ewehurst lane, Langton road, Speldhurst	Not allocated
386	Ashwood Lodge Farm, Penshurst Road, Speldhurst, Tunbridge Wells	Not allocated
416	Land North of Langton House, Langton Green	AL/SP 2
AS_15	Herons Oast Farm, Speldhurst Road, Langton Green, Tunbridge Wells	Not allocated
AS_39	Dragonfly Farm, Langton Road, Speldhurst TN3 0NR	Not allocated

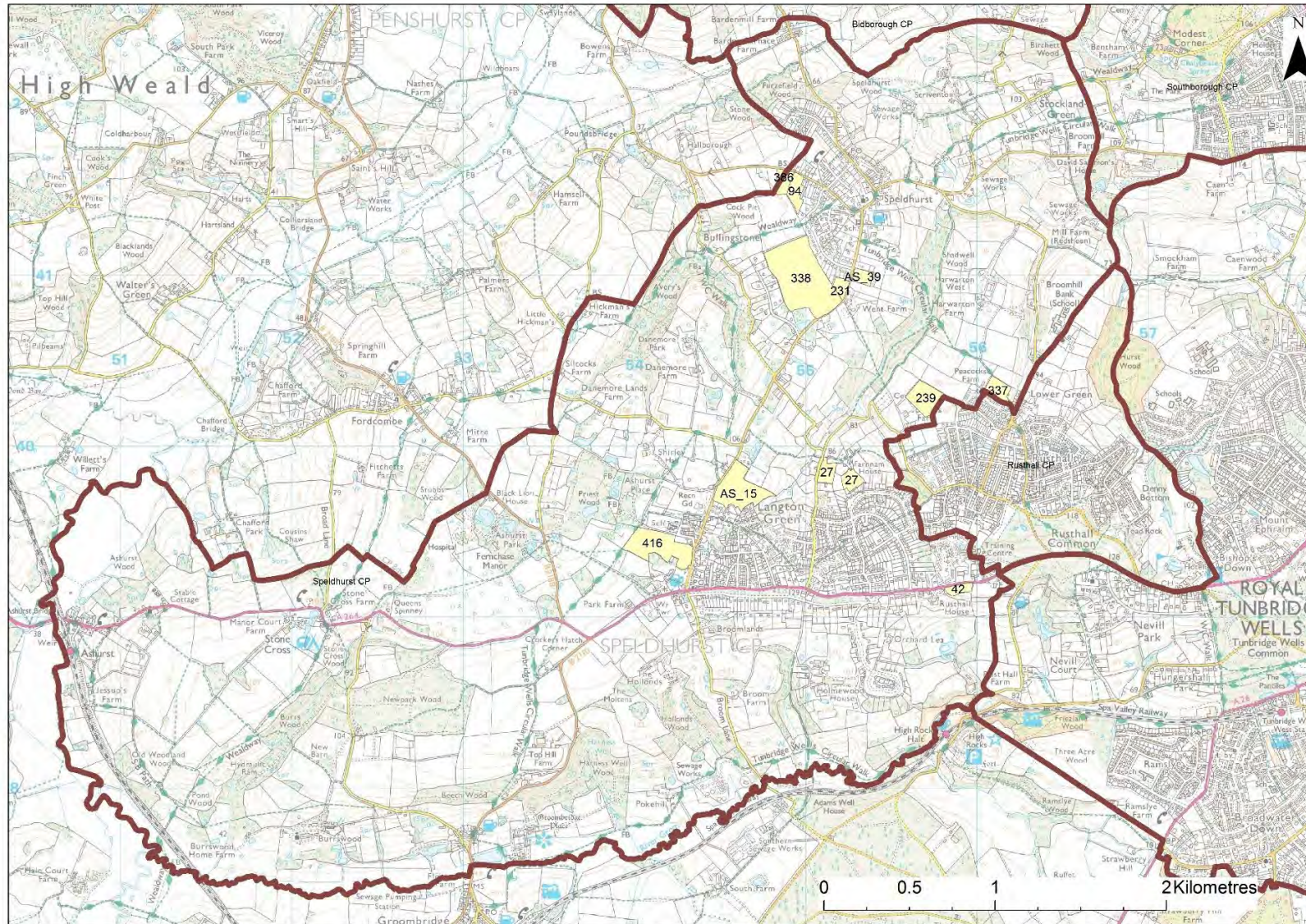


Figure 23. Map of reasonable alternative sites within Speldhurst Parish.

Table 49. SA scores for allocated sites in Speldhurst Parish

Sustainability Objective	Score			
	AL/SP 1	AL/SP 2	AL/SP 3	STR/SP 1 (cumulative)
Air	0 / -	0	0	0 / -
Biodiversity	0	0	0	0
Business Growth	0	0	0	0
Climate Change	0	0	0	0
Deprivation	0	0	0	0
Education	0 / -	+++	0	++ / +++
Employment	+	0	+	+
Equality	-	0	0	0 / -
Health	0	0	0 / +	0 / +
Heritage	0	0	0	0
Housing	+	0	0	+
Land use	- / - -	0	0	-
Landscape	0 / -	0	0	0 / -
Noise	-	0	0	0 / -
Resources	0 / ?	0	0	0
Services & Facilities	- -	0	0 / +	- -
Travel	0 / -	0	0	0 / -
Waste	0	0	0	0
Water	0 / +	0	0	0
Commentary	<p>The cumulative impacts of development in this parish (STR/SP 1) are highly mixed. Economic impacts range from + to - -. Social impacts range from +++ to 0 / - . Environmental impacts range from 0 to - with no positive scores.</p> <p>Further commentary can be found in Appendix T.</p>			

9 SA of Development Management Policies

9.1 Background and Method

- 9.1.1 The development management policies are contained in Section 6 of the Draft Local Plan and form part of the policy framework along with the strategic, place-based and site allocation policies, which aim to achieve the Vision for Tunbridge Wells borough and the Strategic Objectives of the Local Plan. The development management policies provide more detail for decision making in relation to particular issues and for assessing the acceptability of certain types of development. These policies will replace the policies which form part of the existing Development Plan Documents – the Tunbridge Wells Borough Local Plan 2006, the Tunbridge Wells Core Strategy 2010 and the Tunbridge Wells Site Allocations Local Plan 2016.
- 9.1.2 The Draft Local Plan is the second of three stages in preparing the new Local Plan. The first stage was the publication of the Issues and Options document in the summer of 2017, for public consultation. The Issues and Options document set out the main issues facing the borough, with reference to the following seven themes: 1. Natural and Built Environment, 2. Infrastructure, 3. Housing, 4. Economy, 5. Transport and Parking, 6. Leisure and Recreation and 7. Sustainability
- 9.1.3 The Draft Local Plan builds on the Issues and Options document and the feedback received during consultation. The development management policies are based on the continuation of these themes – Environment, Housing, Economic Development, Transport and Parking and Open Space and Recreation, and deal with a number of issues including the following:
- Environment and Design
 - Natural Environment
 - Air, Water, Noise, and Land
 - Types of housing delivery
 - Employment Provision
 - Town, Rural Service, Neighbourhood, and Village Centres
 - Transport Design and assessments, parking, railways
 - Retention and provision of open space, sport, and recreation
 - Types of housing delivery
 - Employment Provision
 - Town, Rural Service, Neighbourhood, and Village Centres
 - Transport Design and assessments, parking, railways
 - Retention and provision of open space, sport, and recreation
- 9.1.4 Table 50 provides a full list of the new development management policies.

Table 50. List of Development Management policies

Theme	Ref	Title
Environment and Design	EN 1	Design and other development management criteria
	EN 2	Sustainable design and construction
	EN 3	Sustainable design standards
	EN 4	Energy reduction in new buildings

Theme	Ref	Title
	EN 5	Climate change adaptation
	EN 6	Historic environment
	EN 7	Heritage Assets
	EN 8	Shop Fronts
	EN 9	Advertisements
	EN 10	Outdoor Lighting and Dark Skies
Natural Environment	EN 11	Net Gains for Nature: biodiversity
	EN 12	Protection of designated sites and habitats
	EN 13	Ashdown Forest Special Protection Area and Special Area of Conservation
	EN 14	Trees, Woodlands, Hedges, and Development
	EN 15	Ancient Woodland and Veteran Trees
	EN 16	Green, Grey, and Blue Infrastructure
	EN 17	Local Green Space
	EN 18	Landscape within the built environment
	EN 19	Arcadian Areas
	EN 20	Rural Landscape
	EN 21	High Weald Area of Outstanding Natural Beauty (AONB)
	EN 22	Agricultural Land
Air, Water, Noise and Land	EN 23	Air Quality
	EN 24	Air Quality Management Areas (AQMA)
	EN 25	Biomass Technology
	EN 26	Water Quality, Supply, and Treatment
	EN 27	Conservation of water resources
	EN 28	Flood Risk
	EN 29	Sustainable Drainage
	EN 30	Noise
	EN 31	Land Contamination
	EN 32	Minerals and Waste
Delivery of Housing	H 1	Implementation of planning permission for new residential dwellings
	H 2	Multi-developer delivery and piecemeal development of larger sites
	H 3	Housing Mix
	H 4	Housing Density
	H 5	Affordable Housing
	H 6	Estate Regeneration
	H 7	Rural Exception Sites
	H 8	Vacant Building Credit
Types of Housing	H 9	Housing for Older People
	H 10	Rural Workers' Dwellings
	H 11	Self Build and Custom Housebuilding
	H 12	Build to Rent
	H 13	Gypsies and Travellers
	H 14	Replacement dwellings outside the Limits to Built Development
	H 15	Residential extensions, alterations, outbuildings, and annexes inside the Limits to Built Development?
	H 16	Residential extensions, alterations, outbuildings, and annexes in the Green Belt and outside the Limits to Built Development
Employment provision	H 17	Extensions to residential curtilages (domestic gardens) outside the Limits to Built Development
	ED 1	The Key Employment Areas
	ED 2	Retention of existing employment sites and buildings
	ED 3	Digital communications and fibre to the premises (FTTP)
	ED 4	Rural Diversification
	ED 5	Conversion of Rural Buildings outside the Limits to Built Development
	ED 6	Commercial and private recreational (including equestrian) uses in the countryside

Theme	Ref	Title
	ED 7	Retention of, and promotion of new, tourist accommodation and attractions
Town, Rural Service, Neighbourhood and village Centres	ED 8	Town, Rural Service, Neighbourhood, and Village Centres Hierarchy
	ED 9	Town and Rural Service Centres
	ED 10	Sequential Test and Local Impact Test
	ED 11	Primary Shopping Areas and retail frontages
	ED 12	Retention of local services and facilities within defined Neighbourhood and Village Centres
Transport and Parking	TP 1	Transport Assessments, Travel Plans, and Mitigation
	TP 2	Transport Design and Accessibility
	TP 3	Parking Standards
	TP 4	Public Car Parks
	TP 5	Safeguarding Railway Land
	TP 6	Safeguarding Roads
Open space, Sport and Recreation	OSSR 1	Retention of Open Space
	OSSR 2	The provision of publicly accessible open space and recreation

9.1.5 The following reasonable alternative options were applied to the development management policies:

- **Option 1:** No Policy – rely on NPPF/PPG where 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.

9.1.6 With regard to Policy EN13 - Ashdown Forest Special Protection Area and Special Area of Conservation, no alternative option is proposed as reasonable alternatives, which now form part of the new policy (i.e. the 7km zone of influence and forms of mitigation), were considered in detail as part of the Sustainability Appraisal and Habitat Regulations Assessment for the Tunbridge Wells Site Allocations Local Plan

2016 and as such, meet the relevant legal requirements.

- 9.1.7 Also, in relation to Policy EN16 - Green Infrastructure, this new policy carries forward NPPF advice, associated guidance and other relevant sources of information and it is considered that there is no reasonable alternative in this case.
- 9.1.8 A No Policy option which relied wholly on Neighbourhood Development Plan (NDP) policies was not considered to be reasonable as not all parishes are implementing NDPs.
- 9.1.9 Following the determination of reasonable alternatives, the methodology for sustainability appraisal set out in Chapter 4 of this report was followed for each DM policy.
- 9.1.10 Tables containing the scores for the policies were completed for each development management theme, followed by a discussion of impacts.
- 9.1.11 With regard to Policy TP6 - Safeguarding Roads, the proposed growth strategy for the borough is somewhat dependent on the implementation of the A228 Strategic Link which by-passes Colts Hill. This route has been through detailed optioneering work by Kent Highways and has been safeguarded since 2006 thus detailed scoring was applied on the assumption that the road would be built in the future. Whereas the other roads considered by TP 6, Halls Hole Road and the A21 Kippings Cross/Lamberhurst link, are included for long term safeguarding only. The scores accordingly reflect this, with much neutral scoring for the longer term safeguarding in line with the method detailed in paragraph 8.1.9.

9.2 Results and Mitigation

- 9.2.1 Summary tables for each development management theme are included below and are followed by a discussion of the findings.

Environment and Design

Table 51. SA scores for Environment and Design policies (part 1 of 3)

Sustainability Objective	Scores									
	EN 1 - Design & Other DM Criteria			EN 2 - Sustainable Design & Construction			EN 3 - Sustainable Design Standards		EN 4 - Energy Reduction in New Buildings	
	Option 1	Option 2	Option 3	Option 1	Option 2	Option 3	Option 1	Option 2	Option 1	Option 2
	No Policy - rely on NPPF/PPG	Keep existing Policy in 2006 Local Plan	New Policy	No Policy - rely on NPPF	Keep existing Policy CP5 in 2010 Core Strategy	New Policy	No Policy	New Policy	No Policy	New Policy
Air	+	0	+	+	+	++	0	++	0	0
Biodiversity	-	+	++	0	+	++	0	++	0	0
Business Growth	+	0	+	+	0	-	0	-	0	0
Climate Change	0	+	++	0	++	++	-	+++	--	+++
Deprivation	0	0	0	0	0	0	0	0	0	++
Education	0	0	0	0	0	0	0	0	0	0
Employment	0	0	0	0	0	0	0	0	0	0
Equality	+	+	+	+	+	+	0	0	0	0
Health	+	+	+	+	+	++	0	++	0	0
Heritage	+	+	++	+	+	+	0	+	0	0
Housing	+	+	+	0	0	0	0	+	0	0
Land use	0	+	+	0	+	0	0	+	0	0
Landscape	++	++	+++	+	+	+	0	++	0	0
Noise	0	+	+	0	+	+	0	+	0	0
Resources	+	+	++	+	+	+++	0	++	0	0
Services & Facilities	+	0	++	+	0	++	0	+	0	0
Travel	+	0	++	+	0	++	0	++	0	0
Waste	0	+	+	0	+	++	0	++	0	0
Water	0	0	++	0	+	++	0	++	0	0
Commentary	Option 3 provides more detail, clarity and guidance which will benefit and enhance the built and natural environment as well as, biodiversity, water and transport objectives.			Option 3 provides a more proactive and detailed approach which will be beneficial to the natural and built environment, climate change, biodiversity and transport objectives.			Option 2 provides a workable standard which will be beneficial to the natural and built environment, climate change, biodiversity and transport objectives.		Option 2 provides a proactive and detailed approach which will be beneficial to climate change objectives.	

Table 52. SA scores for Environment and Design policies (part 2 of 3)

Sustainability Objective	Scores							
	EN5 - Climate Change Adaptation		EN 6 - Historic Environment		EN 7 - Heritage Assets		EN 8 - Shop Fronts	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	Keep existing Policy CP5 in 2010 Core Strategy	New Policy	No Policy - rely on NPPF/PPG	New Policy	No Policy -rely on NPPF/PPG	New Policy	Keep existing Policy (EN6) in 2006 Local Plan	New Policy
Air	+	0	0	0	0	0	0	0
Biodiversity	+	+	0	0	0	0	0	0
Business Growth	0	+	0	+	0	+	+	+
Climate Change	++	+++	0	0	0	0	0	0
Deprivation	0	0	0	0	0	0	0	0
Education	0	0	0	0	0	0	0	0
Employment	0	0	0	0	0	0	0	0
Equality	+	0	0	0	0	0	0	0
Health	+	++	-	+	-	+	0	0
Heritage	+	0	--	+++	++	+++	+	++
Housing	0	0	0	0	0	0	0	0
Land use	+	+	0	0	0	0	0	0
Landscape	+	++	--	+++	++	+++	+	+
Noise	+	0	0	0	0	0	0	0
Resources	+	0	0	0	0	0	0	0
Services & Facilities	0	0	0	+	0	++	0	0
Travel	0	0	0	0	0	0	0	0
Waste	+	0	0	0	0	0	0	0
Water	+	++	0	0	0	0	0	0
Commentary	Option 2 provides a more proactive and detailed approach which will be beneficial to climate change, health, landscape and water objectives		Option 2 provides a more proactive and detailed approach which will be beneficial to heritage, landscape and economic objectives		Option 2 provides a more proactive and detailed approach for each of the heritage assets which will be beneficial to the heritage, landscape and economic objectives		Option 2 provides more detail, clarity and guidance which will benefit the heritage and landscape objectives	

Table 53. SA scores for Environment and Design policies (part 3 of 3)

Sustainability Objective	Scores			
	EN 9 - Advertisements		EN 10 - Outdoor Lighting & Dark Skies	
	Option 1	Option 2	Option 1	Option 2
	No Policy rely on NPPF/PPG	New Policy	Keep existing Policy (EN8) in 2006 Local Plan	New Policy
Air	0	0	0	0
Biodiversity	0	0	-	++
Business Growth	?	+	0	0
Climate Change	0	0	0	+
Deprivation	0	0	0	0
Education	0	0	0	0
Employment	0	0	0	0
Equality	0	0	0	0
Health	0	0	0	0
Heritage	--	++	+	++
Housing	0	0	0	0
Land use	0	0	0	0
Landscape	--	++	+	++
Noise	0	0	0	0
Resources	0	0	0	0
Services & Facilities	0	0	0	0
Travel	0	0	0	0
Waste	0	0	0	0
Water	0	0	0	0
Commentary	Option 2 provides more detail, clarity and guidance which will benefit the heritage and landscape objectives		Option 2 provides more detailed guidance which will be beneficial to meeting the heritage, landscape and biodiversity objectives	

9.2.2 In summary, few Environment and Design preferred policies have negative impacts, with positive scores especially in relation to biodiversity, heritage and landscape objectives.

Natural Environment

Table 54. SA scores for Natural Environment policies (part 1 of 3).

Sustainability Objective	Scores						
	EN 11 - Net Gains for Nature: biodiversity and geodiversity		EN 12 - Protection of Designated Sites and Habitats		EN 13 – Ashdown Forest SPA and SAC	EN 14 - Trees, Woodland, Hedges and Development	
	Option 1	Option 2	Option 1	Option 2	New Policy wording working with other affected LPAs (within a strategic zone of influence affecting the SPA & SAC)	Option 1	Option 2
	Keep existing 2010 Core Policy CP4	New Policy	Keep existing 2006 Local Policy EN 15 & 2010 Core Strategy Policy CP 4	New Policy		Keep existing 2006 Local Plan Policy EN13	New Policy
Air	0	0	0	0	0	0	+
Biodiversity	++	+++	++	+++	+++	0	++
Business Growth	0	0	0	0	0	0	0
Climate Change	+	+	+	+	++	0	+
Deprivation	0	0	0	0	0	0	0
Education	0	0	0	0	0	0	0
Employment	0	0	0	0	0	0	0
Equality	0	0	0	0	0	0	0
Health	0	+	0	+++	0	0	+
Heritage	0	0	0	0	0	0	+
Housing	0	0	0	0	0	0	0
Land use	0	0	0	0	0	0	0
Landscape	++	++	+	++	++	++	+++
Noise	0	0	0	0	0	0	0
Resources	0	0	0	0	0	0	0
Services & Facilities	0	0	0	0	0	0	0
Travel	0	0	0	0	0	0	0
Waste	0	0	0	0	0	0	0
Water	0	++	+	++	0	0	+
Commentary	Option 2 provides more detail, clarity and guidance which will benefit and enhance the biodiversity, water and landscape objectives.		Option 2 provides detail, clarity, guidance and a hierarchal approach which will benefit and enhance the biodiversity, water and landscape objectives.		This option provides a more holistic approach in working with other affected LPAs with more detail, clarity and guidance which will benefit biodiversity, climate change and landscape objectives.	Option 2 provides more detail, clarity and guidance which will benefit the biodiversity, water and landscape objectives.	

Table 55. SA scores for Natural Environment policies (part 2 of 3).

Sustainability Objective	Scores						
	EN 15 - Ancient Woodland and Veteran Trees		EN 16 - Green Infrastructure	EN 17 - Local Green Space		EN 18 - Landscape within the Built Environment	
	Option 1	Option 2	New Policy	Option 1	Option 2	Option 1	Option 2
	No Policy	New Policy		No Policy – defer to NDPs	New Policy	No Policy	New Policy – amended version from 2006 Local Plan
Air	0	+	+	0	0	0	+
Biodiversity	0	++	++	?	+	-	+
Business Growth	0	0	0	0	0	0	0
Climate Change	0	+	++	0	0	0	0
Deprivation	0	0	0	0	0	0	0
Education	0	0	0	0	0	0	0
Employment	0	0	0	0	0	0	0
Equality	0	0	0	0	0	0	0
Health	0	+	+	?	+	-	+
Heritage	-	+++	0	?	++	-	+
Housing	0	0	0	0	0	0	0
Land use	0	0	0	?	++	0	0
Landscape	--	+++	++	?	++	--	+++
Noise	0	0	0	0	0	0	0
Resources	0	0	0	0	0	0	0
Services & Facilities	0	0	0	0	0	0	0
Travel	0	0	+	0	0	0	0
Waste	0	0	0	0	0	0	0
Water	0	+	++	0	0	-	+
Commentary	Option 2 provides detail, clarity and guidance which will benefit the biodiversity, water and landscape objectives.		This option provides detail, clarity and guidance which will benefit the landscape, water, health, climate change and biodiversity objectives.	Option 2 provides detail, clarity and guidance which will benefit the landscape, heritage, land use and biodiversity objectives.		Option 2 provides detail, clarity and guidance which will benefit the landscape, heritage and biodiversity objectives.	

Table 56. SA scores for Natural Environment policies (part 3 of 3).

Sustainability Objective	Scores							
	EN 19 - Arcadian Areas		EN 20 - Rural Landscape		EN 21 - High Weald AONB		EN 22 - Agricultural Land	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	No Policy	New Policy – amended version from 2006 Local Plan	No Policy - rely on Section 15 of NPPF only	New Policy – amended version from 2006 Local Plan	No Policy - rely on Section 15 of NPPF only	New Policy – amended version from 2006 Local Plan	No Policy - rely on Section 15 of the NPPF advice only	New Policy
Air	0	0	0	0	0	0	0	0
Biodiversity	-	+	+	+	+	+	++	+++
Business Growth	0	0	0	0	0	0	0	0
Climate Change	0	0	0	0	0	0	0	0
Deprivation	0	0	0	0	0	0	0	0
Education	0	0	0	0	0	0	0	0
Employment	0	0	0	0	0	0	0	0
Equality	0	0	0	0	0	0	0	0
Health	0	0	0	0	0	0	0	0
Heritage	--	+++	-	++	-	++	0	0
Housing	0	0	0	0	0	0	0	0
Land use	0	0	0	0	0	0	++	+++
Landscape	--	+++	++	+++	++	+++	0	0
Noise	0	0	0	0	0	0	0	0
Resources	0	0	0	0	0	0	0	0
Services & Facilities	0	0	0	0	0	0	0	0
Travel	0	0	0	0	0	0	0	0
Waste	0	0	0	0	0	0	0	0
Water	0	0	0	0	0	+	0	0
Commentary	Option 2 provides detail, clarity and guidance which will benefit the heritage, landscape and biodiversity objectives.		Option 2 provides detail, clarity and guidance which will benefit the heritage, landscape and biodiversity objectives.		Option 2 provides detail, clarity and guidance, relating to specific components of the AONB, which will benefit the heritage, landscape and biodiversity objectives.		Option 2 provides more clarity on grades of land and other factors relating to quality which is more beneficial to the natural environment objectives	

9.2.3 In summary, the preferred Natural Environment policies all have positive or neutral scores, notably against the biodiversity, heritage and landscape objectives, as well as in relation to Climate Change and Health.

Air, Water, Noise and Land

Table 57. SA scores for Air, Water, Noise and Land policies (part 1 of 3)

Sustainability Objective	Scores					
	EN 23 - Air Quality		EN 24 - AQMA's		EN 25 - Biomass Technology	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	Keep relevant part of existing Policy CP5 in 2010 Core Strategy	New Policy	Keep relevant part of existing Policy CP5 in 2010 Core Strategy	New Policy	No Policy	New Policy
Air	++	+++	++	+++	--	+++
Biodiversity	0	++	0	+	0	+
Business Growth	0	0	0	0	0	0
Climate Change	++	+++	++	++	--	++
Deprivation	0	0	0	0	0	0
Education	0	0	0	0	0	0
Employment	0	0	0	0	0	0
Equality	0	0	0	0	0	0
Health	0	0	0	0	0	0
Heritage	0	0	0	0	0	0
Housing	0	0	0	0	0	0
Land use	0	0	0	0	0	0
Landscape	0	0	0	0	0	0
Noise	0	+	0	+	0	0
Resources	0	0	0	0	0	+
Services & Facilities	0	0	0	0	0	0
Travel	0	++	0	+	0	0
Waste	0	0	0	0	0	0
Water	0	0	0	0	0	0
Commentary	Option 2 provides a more proactive and detailed approach which will be beneficial to the air quality, landscape, sustainability, climate change, and transport objectives. Note: health benefits are taken into account by the air quality objective.		Option 2 provides a more proactive and detailed approach which will be beneficial to the air quality, landscape, sustainability, climate change, and transport objectives. Note: health benefits are taken into account by the air quality objective.		Option 2 provides a proactive approach which will be beneficial to air quality, and climate change objectives. Note: health benefits are taken into account by the air quality objective.	

Table 58. SA scores for Air, Water, Noise and Land policies (part 2 of 3)

Sustainability Objective	Scores					
	EN 26 - Water Quality, Supply and Treatment		EN 27 - Conservation of Water Resources		EN 28 - Flood Risk	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	Keep relevant part of existing Policy CP5 in 2010 Core Strategy and 2006 Local Plan Policies EN16	New Policy	Keep relevant part of existing Policy CP5 in 2010 Core Strategy and 2006 Local Plan Policies EN16	New Policy	Keep relevant part of existing Policy CP5 in 2010 Core Strategy and 2006 Local Plan Policy EN18	New Policy
Air	0	0	0	0	0	0
Biodiversity	+	++	+	++	+	0
Business Growth	0	0	0	0	0	0
Climate Change	0	++	+	++	++	++
Deprivation	0	0	0	0	0	0
Education	0	0	0	0	0	0
Employment	0	0	0	0	0	0
Equality	0	0	0	0	0	0
Health	0	0	0	0	0	0
Heritage	0	0	0	0	0	0
Housing	0	0	0	0	0	0
Land use	0	0	0	0	0	0
Landscape	0	+	0	+	0	0
Noise	0	0	0	0	0	0
Resources	0	0	0	0	0	0
Services & Facilities	0	0	0	0	0	0
Travel	0	0	0	0	0	0
Waste	0	0	0	0	0	0
Water	++	+++	++	+++	++	+++
Commentary	Option 2 provides a more proactive and detailed approach which will be beneficial to the water, biodiversity, climate change and landscape objectives.		Option 2 provides a more proactive and detailed approach which will be beneficial to the water, biodiversity, climate change and landscape objectives.		Option 2 provides a more detailed and proactive approach at local level which will be beneficial to the water and climate change objectives.	

Table 59. SA scores for Air, Water, Noise and Land policies (part 3 of 3)

Sustainability Objective	Scores					
	EN 29 - Sustainable Drainage		EN 30 - Noise		EN 31 – Land Contamination	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	No Policy - rely on NPPF/NPPG only	New Policy	Keep relevant part of existing Policy CP5 in 2010 Core Strategy	New Policy	Keep relevant part of existing Policy CP5 in 2010 Core Strategy	New Policy
Air	0	0	0	0	0	0
Biodiversity	+	++	0	0	+	+
Business Growth	0	0	0	0	0	0
Climate Change	++	++	0	0	0	0
Deprivation	0	0	0	0	0	0
Education	0	0	0	0	0	0
Employment	0	0	0	0	0	0
Equality	0	0	0	0	0	0
Health	0	0	++	++	+	+
Heritage	0	0	0	0	0	0
Housing	0	0	0	0	0	0
Land use	0	0	0	0	+	+
Landscape	0	++	0	+	+	+
Noise	0	0	++	+++	0	0
Resources	0	0	0	0	0	0
Services & Facilities	0	0	0	0	0	0
Travel	0	0	0	0	0	0
Waste	0	0	0	0	0	0
Water	+++	+++	0	0	+	+
Commentary	Option 2 provides a more detailed and proactive approach at local level which will be beneficial to water, biodiversity, landscape and climate change objectives.		Option 2 provides more detail, clarity and guidance which will benefit the noise, landscape and health and wellbeing objectives		The scoring is the same but Option 2 provides more detail, clarity and guidance which will benefit the landscape, health, biodiversity and water objectives.	

9.2.4 In summary, the preferred Air, Water, Noise and Land policies are notably positive in relation to Air, Climate Change, Health, Water and, to a lesser extent, Biodiversity objectives, with no identified adverse impacts.

Housing

Table 60. SA scores for housing policies (part 1 of 6)

Sustainability Objective	Scores					
	H 1 - Planning Permission for new residential dwellings		H 2 - Multi-developer & piecemeal delivery of larger sites		H3 - Housing Mix	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	No Policy - use existing government prescribed implementation period (3 years)	New Policy with shorter 2 year implementation period	No Policy	New Policy	Keep existing Policy H2 in 2006 Local Plan and 2010 Core Strategy Policy CP 6	New Policy
Air	0	0	0	0	0	0
Biodiversity	0	0	0	+	0	0
Business Growth	0	0	0	0	0	+
Climate Change	0	0	-	+	0	0
Deprivation	0	0	-	+	+	+
Education	0	0	0	0	0	0
Employment	0	0	0	0	0	0
Equality	0	0	-	+	+	+
Health	0	0	-	+	+	+
Heritage	0	0	0	0	0	0
Housing	++	+++	--	+++	+++	+++
Land use	0	0	0	0	0	0
Landscape	0	0	--	++	0	0
Noise	0	0	0	0	0	0
Resources	0	0	0	+	0	0
Services & Facilities	0	0	0	+	0	+
Travel	0	0	0	+	0	0
Waste	0	0	0	0	0	0
Water	0	0	0	+	0	0
Commentary	Option 2 will speed up the implementation of permissions and housing delivery which will benefit the housing objective.		Option 2 will speed up housing delivery rates which will benefit housing and landscape objectives		Option 2 provides a less prescriptive approach which will address the needs of a particular settlement or area which will benefit the housing objective.	

Table 61. SA scores for housing policies (part 2 of 6)

Sustainability Objective	Scores					
	H 4 - Housing Density			H 5 - Affordable Housing		
	Option 1	Option 2	Option 3	Option 1	Option 2	Option 3
	No Policy - Rely on Section 11 of NPPF only	Keep existing Policy in 2010 Core Strategy (CP6)	New Policy	No Policy - Rely on Section 5 of NPPF only (at least 10% affordable home ownership)	Keep existing Policy in 2010 Core Strategy CP6 - retain existing threshold of 35% for 10 dwellings +	New Policy with 2 different thresholds - greenfield (35%)/brownfield thresholds (40%) and off site contributions for 1 to 9 dwellings
Air	0	0	0	0	0	0
Biodiversity	0	0	0	0	0	0
Business Growth	0	0	0	0	0	0
Climate Change	0	0	0	0	0	0
Deprivation	+	0	0	+	++	++
Education	0	0	0	0	0	0
Employment	0	0	0	0	0	0
Equality	+	0	0	0	0	0
Health	+	0	0	0	0	+
Heritage	0	0	0	0	0	0
Housing	++	+	+++	+	++	+++
Land use	0	0	0	+	0	0
Landscape	++	+	+++	0	0	+
Noise	0	0	0	0	0	0
Resources	0	0	0	0	0	0
Services & Facilities	++	0	++	0	+	+
Travel	++	0	++	0	+	+
Waste	0	0	0	0	0	0
Water	0	0	0	0	0	0
Commentary	Option 3 provides a less prescriptive approach which will address the needs of a particular settlement or area and will benefit housing, services and travel objectives.			Option 3 provides a locally applicable approach for both greenfield and brownfield sites which will benefit affordable housing delivery and landscape objectives.		

Table 62. SA scores for housing policies (part 3 of 6)

Sustainability Objective	Scores						
	H 6 - Estate Regeneration		H 7 - Rural Exception Sites			H 8 - Vacant Building Credit	
	Option 1	Option 2	Option 1	Option 2	Option 3	Option 1	Option 2
	No Policy	New Policy	No Policy rely on Section 5 of NPPF only	Keep existing Policies (H8) in 2006 Local Plan and 2010 Core Strategy	New Policy	No Policy	New Policy
Air	0	0	+	0	0	0	0
Biodiversity	0	0	0	0	0	0	0
Business Growth	0	0	0	0	0	0	0
Climate Change	0	0	0	0	0	0	0
Deprivation	--	++	+	+	+	-	-
Education	0	0	0	0	0	0	0
Employment	0	0	0	0	0	0	0
Equality	0	0	0	+	+	0	0
Health	0	+	0	+	0	0	0
Heritage	0	0	0	0	0	0	0
Housing	--	++	++	+++	+++	-	++
Land use	-	++	0	+	0	0	0
Landscape	-	++	0	++	+++	0	0
Noise	0	0	0	0	0	0	0
Resources	-	-	0	0	0	0	+
Services & Facilities	0	+	++	++	++	0	0
Travel	0	+	++	++	++	0	0
Waste	0	0	0	0	0	0	0
Water	0	0	0	0	0	0	0
Commentary	Option 2 provides a proactive and detailed approach which will benefit housing delivery, landscape and land use objectives.		There is similar scoring across Options 2 and 3 but Option 3 provides a more detailed and locally applicable approach which will benefit affordable housing delivery and the landscape objective.			Option 2 provides an informative approach which will benefit housing delivery objectives.	

Table 63. SA scores for housing policies (part 4 of 6)

Sustainability Objective	Scores								
	H 9 - Housing for Older People				H 10 - Rural Workers' Dwellings		H 11 - Self Build and Custom Housebuilding		
	Meeting need		Accessibility		Option 1	Option 2	Option 1	Option 2	Option 3
	Option 1	Option 2	Option 1	Option 2	No Policy - rely on para 79 of NPPF only	Revised Rural Workers' Dwellings Policy (amendment to Policy in 2006 Local Plan)	Focus on small/windfall sites (up to 10 dwellings)	Alternative Policy with 5% provision for 20+ units	New Policy (as proposed) with 5% provision for 100+ units
	Criteria based policy (as per new Policy)	Site allocations only	Meet Building Reg Part 4 M(2) standards - affordable homes only	Meet Building Reg Part 4 M(2) standards - all homes					
Air	0	0	0	0	0	0	0	0	0
Biodiversity	0	0	0	0	0	0	0	0	0
Business Growth	0	0	0	0	-	+	0	0	0
Climate Change	0	0	0	0	0	0	0	0	0
Deprivation	+	+	+	+	0	0	0	0	0
Education	0	0	0	0	0	0	0	0	0
Employment	0	0	0	0	-	+	0	0	0
Equality	0	0	++	+++	0	0	0	0	0
Health	+	?	+	+	0	0	0	0	0
Heritage	0	0	0	0	0	0	0	0	0
Housing	+++	+++	++	+++	--	++	++	++	++
Land use	0	0	0	0	0	0	?	?	0
Landscape	+++	?	0	0	---	+++	?	?	+
Noise	+	?	0	0	0	0	0	0	0
Resources	+	0	0	0	0	0	?	?	+
Services & Facilities	++	+	0	0	0	0	0	0	0
Travel	+	?	0	0	0	0	0	0	0
Waste	0	0	0	0	0	0	0	0	0
Water	0	0	0	0	0	0	0	0	0
Commentary	Option 1 provides a more flexible approach which will benefit housing delivery (for a specific group), landscape and travel objectives while Option 2 would provide more certainty in terms of location but with some unknown factors at this stage. A mixture of both options may be the best way forward in meeting the relevant SA objectives.		Option 2 provides a wider approach which will benefit the housing delivery objective for this particular group/housing type (subject to viability assessment).		Option 2 provides a detailed approach which will benefit housing delivery (for a specific group) and landscape objectives.		Option 2 with a lower threshold would provide greater distribution and is more proactive but this is balanced to some extent by a likely impact on the delivery of smaller sites. Option 3 is more likely to have some benefits in terms of landscape and resources.		

Table 64. SA scores for housing policies (part 5 of 6)

Sustainability Objective	Scores					
	H 12 - Build to Rent		H13 - Gypsies and Travellers		H 14 - Replacement Dwellings Outside the LBD	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	No affordable housing	Promote 20% affordable housing at affordable rent	Focus on intensification/ext ension of existing sites	Focus on new allocations	No Policy	Revised Replacement Dwellings Policy (amendment to Policy H10 in 2006 Local Plan)
Air	0	0	0	0	0	0
Biodiversity	0	0	0	0	0	+
Business Growth	0	0	0	0	0	0
Climate Change	0	0	0	0	0	0
Deprivation	-	++	0	0	0	0
Education	0	0	0	0	0	0
Employment	0	0	0	0	0	0
Equality	0	0	0	0	0	0
Health	0	+	0	0	0	0
Heritage	0	0	0	0	-	++
Housing	--	+++	++	++	0	+
Land use	0	0	+	0/-	0	+
Landscape	0	0	++	0/-	--	+++
Noise	0	0	+	+	0	0
Resources	0	0	0	0	--	++
Services & Facilities	0	0	0	0	0	0
Travel	0	0	0	0	0	0
Waste	0	0	0	0	-	+
Water	0	0	0	0	0	0
Commentary	Option 2 provides a more proactive and workable approach which will benefit housing delivery objectives (for a specific tenure type). Also, having social rent, as per Policy H5 - Affordable Housing is found not to be viable.		Option 1 provides a workable and detailed approach which will benefit housing delivery (for a specific group and family needs) and landscape objectives while Option 2 could be hindered by the landscape objectives and result in less preferred locations in terms of meeting specific family needs.		Option 2 provides a directive approach as well as detailed guidance which will benefit landscape, heritage and biodiversity objectives.	

Table 65. SA scores for housing policies (part 6 of 6)

Sustainability Objective	Scores					
	H 15 - Residential Extensions, alterations etc. inside the LBD		H 16 - Residential Extensions, alterations etc. outside the LBD		H 17 - Extensions to Curtilages outside the LBD	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	No Policy	New Policy	No Policy	Revised Policy (amendment to Policy H11 in 2006 Local Plan)	No Policy	New Policy
Air	0	0	0	0	0	0
Biodiversity	-	+	-	+	-	+
Business Growth	0	0	0	0	0	0
Climate Change	0	0	0	0	0	0
Deprivation	0	0	0	0	0	0
Education	0	0	0	0	0	0
Employment	0	0	0	0	0	0
Equality	0	0	0	0	0	0
Health	0	0	0	0	0	0
Heritage	-	+	-	+	0	+
Housing	0	0	0	0	0	0
Land use	0	0	0	+	-	+
Landscape	--	+++	--	+++	--	+++
Noise	0	0	0	0	0	0
Resources	0	+	0	+	0	0
Services & Facilities	0	0	0	0	0	0
Travel	0	0	0	0	0	+
Waste	0	+	-	+	0	0
Water	0	0	0	0	0	0
Commentary	Option 2 provides detail, clarity and guidance which will benefit and enhance the built environment as well as the Landscape, Resources, Waste, Biodiversity and Heritage objectives.		Option 2 provides a more directive approach as well as more detailed guidance which will benefit the Landscape, Heritage, Resources, Waste, Land Use and Biodiversity objectives.		Option 2 provides a directive approach as well as detailed guidance which will benefit Landscape, Travel, Land Use, Heritage and Biodiversity objectives.	

9.2.5 In summary, the preferred Delivery of Housing policies (H1 – H8) are generally positive (mainly for Housing and Land Use) or neutral. An exception to this is a negative deprivation score for the vacant building credit policy, but this is the same for the option of no local policy, with no clear potential for mitigation, given the nature of the provision.

9.2.6 Similarly, the preferred Types of Housing policies (H9 – H17) represent the most sustainable option for each policy area, although it is worth highlighting that options around the extent of a requirement for accessible and adaptable homes, and for site size thresholds for the provision of custom and self-build homes, will be influenced by findings on viability, which is largely outside the scope of the SA.

Employment

Table 66. SA scores for employment policies (part 1 of 2)

Sustainability Objective	Scores							
	ED 1 - Key Employment Areas		ED 2 - Retention of Existing Employment Sites and Buildings		ED3 - Digital Communications and FTTP		ED 4 - Rural Diversification	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	Keep existing Policies (ED1, ED2, ED3) in 2006 Local Plan and 2010 Core Strategy CP7	New Policy	No Policy	New Policy	Keep existing Policy (EN20) in 2006 Local Plan	New Policy	No policy - rely on NPPF only	New Policy
Air	+	+	0	0	0	+	+	+
Biodiversity	0	0	0	0	0	0	0	0
Business Growth	++	+++	--	+++	+++	++	+++	+++
Climate Change	+	+	0	0	0	+	+	+
Deprivation	0	0	0	0	0	0	0	0
Education	0	0	0	0	0	0	0	0
Employment	+++	+++	--	+++	+	++	+++	+++
Equality	0	0	0	0	0	0	0	0
Health	0	0	0	0	++	+++	0	0
Heritage	0	0	0	0	0	0	+	+++
Housing	0	0	0	0	0	0	0	0
Land use	++	+	0	++	0	+	+	++
Landscape	0	0	0	0	++	++	++	+++
Noise	+	0	0	0	0	0	0	0
Resources	+	+	0	+	0	0	+	++
Services & Facilities	+	+++	-	+	0	++	+++	+++
Travel	++	++	0	0	0	++	++	++
Waste	0	0	0	0	0	0	0	+
Water	0	0	0	0	0	0	0	0
Commentary	Option 2 provides more detail, clarity and guidance which will benefit employment, services, economic and transport objectives.		Option 2 provides detail, clarity and guidance which will benefit business growth and employment objectives.		Option 2 provides more detail, clarity and guidance which will benefit employment, business growth, landscape, health and transport objectives.		Option 2 provides more detail, clarity and guidance which will benefit employment, landscape, land use resources and waste objectives.	

Table 67. SA scores for employment policies (part 2 of 2)

Sustainability Objective	Scores						
	ED 5 - Conversion of Rural Buildings Outside the LBD			ED 6 - Commercial etc. Uses in the Countryside		ED 7 - Retention and promotion of Tourist Accommodation & Attractions	
	Option 1	Option 2	Option 3	Option 1	Option 2	Option 1	Option 2
	No Policy - rely on NPPF advice only	Keep existing Policies (H13 and ED5) in 2006 Local Plan	New Policy	No Policy	New Policy	Keep existing Policies (T1-T3) in 2006 Local Plan and 2010 Core Strategy CP7	New Policy
Air	0	0	0	0	0	0	+
Biodiversity	0	0	+	0	+	0	0
Business Growth	++	++	+++	-	+++	++	++
Climate Change	+	0	0	0	0	0	+
Deprivation	0	0	0	0	0	0	0
Education	0	0	0	0	0	0	0
Employment	++	+	++	-	++	+	++
Equality	0	0	0	0	0	0	0
Health	0	0	+	-	+	0	0
Heritage	+	++	+	0	+	+	+
Housing	0	0	0	0	0	0	0
Land use	+	++	+++	-	+++	0	0
Landscape	+	+++	+++	-	+++	+	++
Noise	0	0	0	0	0	0	0
Resources	+	+	++	-	++	0	0
Services & Facilities	+	0	+	-	+	+++	+++
Travel	+	0	0	0	0	+	++
Waste	0	0	+	0	+	0	0
Water	0	0	+	0	+	0	0
Commentary	Option 3 provides more detail, clarity and guidance which will benefit the business growth, employment, landscape and heritage objectives.			Option 2 provides a proactive and detailed approach which will be beneficial to economic, landscape, heritage and biodiversity objectives.		Option 2 provides a more proactive and detailed approach which will be beneficial to business growth, employment and landscape objectives.	

9.2.7 It is notable that none of the preferred employment policies score negatively against the objectives, due mainly to the provisions in the respective policies to take account of a wide range of sustainability considerations.

Town, Rural Service, Neighbourhood and Village Centres

Table 68. SA scores for town, rural service, neighbourhood and village centres policies

Sustainability Objective	Scores									
	ED 8 - Centres Hierarchy		ED 9 - Towns and Rural Service Centres		ED 10 - Sequential Test and Local Impact Test		ED 11 - Primary Shopping Areas and Retail Frontages		ED 12 - Retention of Local Services and Facilities	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	Keep existing 2006 TW Local Plan Policies (CR1 – CR3) and 2010 Core Strategy Policy CP8	New Policy	Keep existing 2006 TW Local Plan Policies (CR5, CR7, CR9, CR10, CR12) and 2010 Core Strategy Policy CP8	New Policy	Keep existing 2006 TW Local Plan Policies (CR1 – CR3) and 2010 Core Strategy Policy CP8	New Policy	Keep existing 2006 TW Local Plan Policies (CR5, CR7, CR9, CR10, CR12) and 2010 Core Strategy Policy CP8	New Policy	Keep existing 2006 TW Local Plan Policies (CR6, CR13) and 2010 Core Strategy Policy CP8	New Policy
Air	0	+	0	0	0 / +	+	0	0	+	+
Biodiversity	0	0	0	0	0	0	0	0	0	0
Business Growth	++	+++	++	+++	++	++	++	+++	+	+
Climate Change	0	0	0	0	0	+	0	0	0	0
Deprivation	0	0	0	0	0	0	0	0	0	0
Education	0	0	0	0	0	0	0	0	0	0
Employment	+	++	++	++	++	+	+	+	+	+
Equality	0	0	0	0	0	0	0	0	+	+
Health	0	0	0	0	0	0	0	0	+	+
Heritage	0	0	0	0	0	0	0	0	0	0
Housing	0	0	0	0	0	0	0	0	0	0
Land use	0	0	0	0	0	0	0	0	0	0
Landscape	0	0	0	0	0	0	0	0	0	0
Noise	0	0	0	+	0	0	0	0	0	0
Resources	0	0	0	0	0	0	0	0	0	0
Services & Facilities	++	+++	++	+++	+++	+++	+++	+++	+++	+++
Travel	+	++	+	+	+	++	+	+	+	++
Waste	0	0	0	0	0	0	0	0	0	0
Water	0	0	0	0	0	0	0	0	0	0
Commentary	Option 2 provides a more proactive and constructive approach which will be beneficial to the business growth, employment, services & travel objectives.		Option 2 provides a more proactive and constructive approach which will be beneficial to the business growth, employment, and services objectives		Option 2 provides a more proactive and constructive approach which will be beneficial to the business growth, employment, and services objectives		Option 2 provides a less prescriptive, more flexible approach which will be beneficial to the business growth, employment, and services objectives.		Option 2 provides more detail and guidance which will benefit the services and travel objectives.	

9.2.8 In summary, both existing policies and the proposed revised/updated ones score well, notably against Business Growth, Employment and Services and facilities objectives, with no negative impacts. This is explained by the relevant criteria within policies, with the new policies representing some improvements.

Transport and Parking

Table 69. SA scores for transport and parking policies (part 1 of 3)

Sustainability Objective	Scores			
	TP 1 - Transport Assessments, Travel Plans & Mitigation		TP 2 - Transport Design and Accessibility	
	Option 1	Option 2	Option 1	Option 2
	Keep existing 2006 TW Local Plan Policies (TP1 and TP2) and 2010 Core Strategy Policy CP3	New Policy	Keep existing 2006 TW Local Plan Policies (TP3) and 2010 Core Strategy Policy CP3	New Policy
Air	++	++	+	+
Biodiversity	0	0	0	0
Business Growth	+	++	+	+
Climate Change	+	+	+	+
Deprivation	0	0	0	0
Education	0	0	0	0
Employment	+	+	+	+
Equality	+	+	+	++
Health	++	++	++	++
Heritage	0	0	0	++
Housing	0	0	0	0
Land use	0	0	0	0
Landscape	0	0	+	+++
Noise	++	++	++	++
Resources	0	0	0	0
Services & Facilities	++	++	++	++
Travel	+++	+++	+++	+++
Waste	0	0	0	0
Water	0	0	0	0
Commentary	Option 2 provides more detail, clarity and guidance which will be beneficial to travel, business growth, services and health and well being objectives.		Option 2 provides a more proactive and detailed approach which will be beneficial to travel, landscape, heritage, equality and health and well being objectives.	

Table 70. SA scores for transport and parking policies (part 2 of 3)

Sustainability Objective	Scores						
	TP 3 - Parking Standards			TP 4 - Public Car Parks		TP 5 - Railways	
	Option 1	Option 2	Option 3	Option 1	Option 2	Option 1	Option 2
	No Policy - rely on Section 9 of NPPF advice only	Keep existing 2006 TW Local Plan Policy (policies TP5- TP9)	New Policy	No Policy	New Policy	Keep existing Policy in 2010 Core Strategy (policy CP3)	New Policy
Air	+	+	+	0	+	+	++
Biodiversity	0	0	0	0	0	0	0
Business Growth	+	+	+	-	++	+	+
Climate Change	+	+	+	0	+	+	+
Deprivation	0	0	0	0	0	0	0
Education	0	0	0	0	0	0	0
Employment	+	+	+	-	+	0	0
Equality	+	0	0	0	0	0	0
Health	+	+	+	0	+	0	+
Heritage	0	++	+	0	0	0	++
Housing	0	0	0	0	0	0	0
Land use	0	0	0	0	0	0	0
Landscape	0	0	++	0	0	0	+
Noise	0	0	0	0	0	0	0
Resources	0	0	0	0	0	0	0
Services & Facilities	+	+	+	-	++	+	++
Travel	++	+++	+++	-	++	++	+++
Waste	0	0	0	0	0	0	0
Water	0	0	0	0	0	0	0
Commentary	The scoring for options 2 and 3 are similar but Option 3 provides more detail, clarity and guidance which supports a locally applicable approach with the introduction of additional parking zones (based on levels of car ownership for residential schemes) as well as introducing the new concept of car club, while other forms of non private car mode transport and active travel are encouraged which will be beneficial to travel, economic and landscape objectives			Option 2 provides clarity and guidance which will be beneficial to the business growth, services and travel objectives.		Option 2 provides a proactive and detailed approach which will be beneficial to travel and services objectives.	

Table 71. SA scores for transport and parking policies (part 3 of 3)

Sustainability Objective	Scores					
	Policy TP 6 - Safeguarding Roads					
	Halls Hole Road		A228 Strategic Link		A21 Kippings Cross/Lamberhurst	
	Option 1	Option 2	Option 1	Option 2	Option 1	Option 2
	No safeguarding	New Policy	No safeguarding	New Policy	No safeguarding	New Policy
Air	0	0	0	0 / +	0	0
Biodiversity	0	0	0	0 / -	0	0
Business Growth	0	0	0	0	0	0
Climate Change	0	?	0	?	0	?
Deprivation	0	0	0	0	0	0
Education	0	0	0	0	0	0
Employment	0	0	0	+	0	0
Equality	0	0	0	0	0	0
Health	0	0	0	0	0	0
Heritage	0	0	0	-	0	0
Housing	0	0	0	0	0	0
Land use	0	0	0	--	0	0
Landscape	0	0	0	--	0	0
Noise	0	0	0	0 / +	0	0
Resources	0	0	0	0 / ?	0	0
Services & Facilities	0	0	0	0	0	0
Travel	-	++	-	+ / ++	-	++
Waste	0	0	0	0	0	0
Water	0	0	0	0	0	0
Commentary	Option 2 provides opportunity for the long term safeguarding of road improvements as well as improvements to bus services and other forms of active travel which will benefit the travel/transport objective.		Option 2 provides opportunity for the safeguarding of road improvements as well as improvements to bus services and other forms of active travel which will benefit the travel/transport objective.		Option 2 provides opportunity for the long term safeguarding of road improvements as well as improvements to bus services and other forms of active travel which will benefit the travel/transport objective.	

9.2.9 In summary, the preferred new Transport and Parking policies are improvements on existing policies in terms of a few objectives. The 'safeguarding roads' policies are difficult to assess, as there is generally little indication of the details of future proposals at this point, added to which the safeguarding does not commit to a scheme. However, there is more certainty and detail in relation to the A228 Strategic Link, which has been assessed as a proposal because it is defined as critical infrastructure linked to strategic growth. Halls Hole Road and A21 Kippings Cross to Lamberhurst policies do not have this same status and thus are assessed as safeguarding land only in line with the methods detailed in paragraph 8.1.9

Open Space, Sport and Recreation

Table 72. SA scores for Open Space, Sport and Recreation policies

Sustainability Objective	Scores			
	OSSR1 - Retention of Open Space		OSSR 2 - Provision of Publicly Accessible Open Space and Recreation	
	Option 1	Option 2	Option 1	Option 2
	Use existing Policy (R1) in 2006 Local Plan and 2010 Core Strategy Policy CP8	New Policy	Use existing Policy (R2) in 2006 Local Plan and 2010 Core Strategy Policy CP8	New Policy
Air	0	+	0	0
Biodiversity	0	+	0	0
Business Growth	0	0	0	0
Climate Change	0	0	0	0
Deprivation	0	0	+	+
Education	0	0	0	0
Employment	0	0	0	0
Equality	+	+	++	+++
Health	+++	+++	+++	+++
Heritage	0	0	0	0
Housing	0	0	0	0
Land use	+	+	+	+
Landscape	++	++	++	+++
Noise	0	0	0	+
Resources	0	0	0	0
Services & Facilities	++	++	++	+++
Travel	+	+	++	+++
Waste	0	0	0	0
Water	0	0	0	0
Commentary	Option 2 provides a more directive and detailed approach which will benefit health and well being, landscape and travel objectives.		Although the scoring is similar for Options 1 and 2, Option 2 provides a more directive and detailed approach which will benefit health and well being, landscape and travel objectives.	

9.2.10 In summary, the preferred new Open Space, Sport and Recreation policies are found to represent some improvements over existing policies, both for the retention of existing and provision of new open spaces.

9.3 Findings

9.3.1 The main findings of the above appraisals of the respective development management policies are:

- the preferred development management policies make a clearly positive contribution towards meeting sustainability objectives
- where applicable, the preferred new Local Plan policies generally score notably better than options that rely on the national policy framework, benefitting from their regard to local circumstances

- where preferred Local Plan policies are refinements of existing Local Plan policies, the appraisals often show only marginally improved scores, although these are material and support the proposed changes

10 Conclusion

10.1.1 Table 73 below provides a final discussion of the overall impacts of all elements of the Draft Local Plan on each of the sustainability objectives. In essence, this means that the results of the SA for the spatial development strategy (and underlying site allocations) are considered alongside the strategic objectives, the remaining strategic policies and the Development Management policies. Overall impacts are discussed alongside any synergistic and temporal effects.

10.1.2 A complete SA combining all elements of the SA is given in Table 73.

Table 73. Complete SA of all elements of the Draft Local Plan.

Sustainability Objective	Score
Air	?
Biodiversity	0
Business Growth	+++
Climate Change	?
Deprivation	+++
Education	++
Employment	+++
Equality	++
Health	+++
Heritage	?
Housing	+++
Land use	--
Landscape	--
Noise	?
Resources	+
Services & Facilities	?
Travel	?
Waste	0
Water	?
Commentary	<p>Economic objectives score highly positively (plus a mixed score for Services and Facilities).</p> <p>Environmental objectives mostly score as mixed with neutral scores for Biodiversity and Waste, and negative scores for Landscape and Land Use.</p> <p>Social objectives score highly positively (plus a mixed score for Travel).</p>

Table 74. Impact of overall Draft Local Plan on each Sustainability Appraisal objective

Sustainability Objective		Discussion of Significant Effects and Contribution Towards Sustainable Development
1	Air	<p>Strategic objectives: The air quality objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) – see Table 8. This is because the increased volume of traffic associated with construction of many new dwellings is likely to cause a deterioration in local air quality, especially near to Royal Tunbridge Wells and Tonbridge. However, Strategic Objective 3 (Travel) addresses air quality issues directly by ‘prioritising active travel’ over the use of private cars and embracing technology such as electric vehicles to help address air quality issues directly.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the air quality objective can be seen in Table 14. A slight negative score is recorded to reflect the expected decline in local air quality, offset with the expectation for substantive investment in active and sustainable travel methods. Across the parishes and sites, the most positive effects on the air quality objective are expected from site allocation policies AL/PW 2, AL/PW 4, AL/CRS 8, AL/HA 1, AL/RTW 15, AL/RTW 25, AL/RTW 29 reflecting the location of sites in positions where private car use is not necessary, the provision of transport infrastructure that will improve local air quality (e.g. Hawkhurst relief road). The worst effects are expected from site allocation policies AL/PE 6, AL/BE 4, AL/HA 8, AL/HA 9, AL/HA 10, AL/CRS 6, AL/CRS 15, AL/CRS 16, AL/SO 3, AL/RTW 9 and AL/RTW 18. This reflects the location of sites near to the AQMA, or the rural nature of sites or the proposed use of site that makes private car use almost essential.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the air quality objective can be seen in Table 18 and Table 19. These strategic objectives are expected to mostly bring about highly positive impacts on the air quality objective. STR 6 (Transport) addresses air quality issues directly in a similar way to Strategic Objective 3 (Travel), while the scores for the remaining objectives are assigned to reflect the expectation that the strategic policies would be in line with sustainable development goals either through the use of sustainability design standards (STR 7) or a more holistic master planning-style approach (STR 3). STR 8 (Environment) would not address air quality issues and STR 4 (Green Belt) would result in a mixed effect on the air quality objective reflecting the range of scores across sites allocated within the Green Belt.</p> <p>DM policies: The most important development management policies for air quality are Policies EN 23 (air quality), EN 24 (AQMA) and EN25 (biomass technology). Implementing these policies would have a highly positive impact on the air quality objective. Further key policies that have relevance to air quality are EN1, EN2, EN3, EN4, EN14, EN15, EN16, EN18, the transport policies and policy OSSR1. These policies score positively for their impact upon the air quality objective as they either provide for green infrastructure that can reduce pollutants or make provision for reduce use of private vehicles, via provision of new transport infrastructure (e.g. A228 link).</p> <p>Overview: The various elements of the Draft Local Plan will have a mixed effect on air quality overall. The unavoidable negative consequences of building a large number of new dwellings are fully recognised and are being mitigated to some extent through policy either strategically for the borough or at the level of site specifics by development management. Multiple synergistic effects exist in relation to this objective. For example, active travel improvements have benefits to climate change, health, travel choice, equality (by giving options for elderly/disabled) and noise. Over time, as government invests more in electric vehicles and associated infrastructure, it is expected that impacts for poor air quality will decline. This change is expected to be noticed within the plan period.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
2 Biodiversity	<p>Strategic objectives: The Biodiversity objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) – see Table 8. This is principally because the large area of greenfield land take that would be required for construction of new dwellings is likely to create pressure on existing habitats. However, Strategic Objective 6 (Environment) offers protection to “valued natural environment” and expects net gains for nature thus any losses would be more than offset.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the Biodiversity objective can be seen in Table 14. A neutral score is recorded overall to reflect the multiple instances of indirect risk or conflict with habitat that would be offset by large gains both on strategic sites and via the net gains expectation.</p> <p>Across the parishes and sites, the most positive effects on the Biodiversity objective are expected from site allocation policies AL/SO 4, AL/CA 3 (aka AL/PW 1), AL/CRS 11 and AL/BE 4 reflecting policy requirements for long term management of relevant sites of biodiversity value, indirect protection benefits or provision of significant enhancements. The worst effects are expected from site allocation policies AL/RTW 1, AL/CRS 4, AL/CRS 6, AL/CRS 9 and AL/PE 6. This reflects the risk development poses to nearby sites of biodiversity value from pressures such as recreation, removal of adjacent habitat or connectivity to adjacent habitat.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the Biodiversity objective can be seen in seen in Table 18 and Table 19. These strategic objectives are mostly expected to bring about highly positive impacts on the Biodiversity objective. STR 8 (Environment) addresses biodiversity issues directly in a similar way to Strategic Objective 6 (Distinctive Environment), while the remaining objectives are mostly in line with sustainable development goals either through the use of sustainability design standards (STR 7) or a more holistic master planning style approach (STR 3). STR 4 (Green Belt) would result in an overall neutral effect on the Biodiversity objective reflecting the range of scores across development sites allocated within the Green Belt.</p> <p>DM policies: The most important development management policies for biodiversity are Policies EN11 (Net Gains for Nature), EN12 (Protection of Designated Sites and Habitats) and EN13 (Ashdown Forest SPA and SAC). Implementing these policies would have a highly positive impact on the Biodiversity objective. Further key policies that have relevance to biodiversity are EN1, EN2, EN3, EN10, EN14, EN15, EN16, EN17, EN18, EN19, EN22, EN23, EN25 and OSSR1. These policies score positively for their impact upon the Biodiversity objective as they offer protection for biodiverse habitat.</p> <p>Overview: Overall, the risks that large amounts of development pose to existing habitat are mitigated by a policy requirement for net gains for nature thus leaving a neutral impact. This policy is critical in preventing the overall score for the Biodiversity objective becoming more negative.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
3 Business Growth	<p>Strategic objectives: The Business Growth objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan (see Table 8). This is caused by the expectation both within the Draft Local Plan and as a fundamental principle of sustainable development that the economy is supported.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the Business Growth objective can be seen in Table 14. A positive score is recorded to reflect the expectation that significant gains for business are proposed.</p> <p>Across the parishes and sites, the most positive effects on the Business Growth objective are expected from site allocation policies AL/SO 1, AL/SO 3, AL/CA 1 (aka AL/PW 1), AL/PW 2 and AL/PE 6 reflecting the explicit requirement that business uses on these sites.</p> <p>The worst effects are expected from site allocation policies AL/RTW 7, AL/RTW 8, AL/RTW 17 and AL/RTW 30. In all these cases, the negative score reflects a loss of business space. However, it should be noted that despite these losses, the needs for the borough are still being met.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the Business Growth objective can be seen in seen in Table 18 and Table 19. Highly positive impacts on the Business Growth objective are expected from all these strategic policies except for STR 8 (Environment) which would not address business growth issues. However, it is not expected that a conflict would exist as the required scale of business growth can be carefully planned to minimise impacts upon the environment.</p> <p>DM policies: The most important development management policies for business growth are the employment policies ED 1 – ED 7. All these policies have a highly positive impact on the Business Growth objective.</p> <p>Further key policies that have relevance to business growth are H 10 (rural worker’s dwellings) and the Town, Rural Service, Neighbourhood and Village Centres policies ED 8 – ED 12. All these policies protect and improve business premises, transport links and housing provision to the benefit of local business.</p> <p>Overview: The various elements of the Draft Local Plan will have a highly beneficial impact upon the Business Growth objective. This will result in the synergistic effect of a greater provision of employment opportunities in the borough.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
4 Climate Change & Energy	<p>Strategic objectives: The climate change and energy objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) – see Table 8. This is because the increased energy and fuel consumption associated with construction and operation of a large number of new dwellings is unavoidable. However, Strategic Objective 8 (Climate Change) addresses climate change and energy issues directly by ensuring impacts are minimised and Strategic Objective 3 (Travel) ‘prioritising active travel’ over the use of private cars and embracing technology such as electric vehicles. Thus, both these strategic objectives will help mitigate impacts.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the climate change and energy objective can be seen in Table 14. A negative score is recorded to reflect the expected increase in energy and fuel use, offset with the expectation for substantive investment in active and sustainable travel methods. Across the parishes and sites, a slight positive effect on the climate change and energy objective is expected from site allocation policy AL/CRS 11 to reflect the improvements planned for non-motorised transport. In addition, large positive effects could be seen from policy RTW 14 which identifies the site as having potential for development as a solar farm. The worst effects are expected from site allocation policies AL/RTW 18, AL/RTW 27, RTW/29, AL/CA 3 (aka AL/PW 1) and AL/CRS 9. This reflects the construction of large, energy-intensive developments which would significantly increase vehicle movements.</p> <p>Strategic Policies 2 - 10: The effect of strategic objectives (STR 2-STR 10) on the climate change and energy objective can be seen in seen in Table 18 and Table 19. These strategic objectives are expected to mostly bring about highly positive impacts on the climate change and energy objective by being in line with sustainable development goals (either through the use of sustainability design standards e.g. STR 7 or a more holistic master planning-style approach e.g. STR 3. STR 8 (Environment) would not address climate change and energy issues directly and STR 4 (Green Belt) would result in a negative effect on the climate change and energy objective reflecting the range of scores across development sites allocated within the Green Belt.</p> <p>DM policies: The most important development management policies for climate change and energy are Policies EN 4 (energy reduction in new buildings) and EN 5 (climate change adaptation). Implementing these policies would have a highly positive impact on the climate change and energy objective. Further key policies that have relevance to climate change and energy are EN1, EN2, EN3, EN14, EN15, EN16, the transport policies and policy OSSR1. These policies score positively as they either provide for green infrastructure that can results in carbon sequestration or make provision for reduce use of private vehicles e.g. via active travel improvements.</p> <p>Overview: The various elements of the Draft Local Plan will have a mixed effect on climate change and energy overall. The unavoidable negative consequences of building a large number of new dwellings are fully recognised and are being mitigated to some extent through policy either strategically for the borough or at the level of site specifics by development management. Multiple synergistic effects exist in relation to this objective. For example, active travel improvements could have benefits for air quality, health, travel choice and equality (by giving options for elderly/disabled). Over time, as government imposes stricter expectation on energy use within the home and invests more in electric vehicles and associated infrastructure, it is expected that some improvements could be seen (electricity is a lower carbon fuel source than petrol). This change is expected to be noticed very shortly into the plan period and a five-year review of DM policies is highly recommended.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
5 Deprivation	<p>Strategic objectives: Deprivation is not an issue that is addressed directly by the strategic objectives. However, it was felt that the deprivation objective is indirectly compatible with (or has an uncertain relationship with) all strategic objectives in the Draft Local Plan (see Table 8). This is caused by the general expectation within the Draft Local Plan that, in addition to development on greenfield land, regeneration takes place where it is needed, and social needs are met as much as possible. Strategic objective 5 (Vibrant Borough) is particularly relevant.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the deprivation objective can be seen in Table 14. A positive score is recorded to reflect the proposals for substantial regeneration in or near to pockets of income deprivation.</p> <p>Across the parishes and sites, the most positive effects on the deprivation objective are expected from site allocation policies AL/RTW 3, AL/RTW 29, AL/SO1, AL/CA 1, AL/CA 3 (aka AL/PW 1), AL/PW 2 and AL/PW 4 reflecting the either a policy requirement for regeneration in or near areas of high income deprivation.</p> <p>Given the fundamental aim of the Local Plan to improve the borough, there are no negative effects predicted for the deprivation objective from any proposed site allocations. However, it should be noted that the positive benefits are skewed in favour of urban settlements where regeneration issues are more pertinent.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the deprivation objective can be seen in seen in Table 18 and Table 19. Highly positive impacts on the deprivation objective are expected from all these strategic policies except for STR 5 (Infrastructure), STR 6 (Transport) and STR 8 (Environment) which would not address deprivation issues directly. No negative scores are recorded.</p> <p>DM policies: The most important development management policies for deprivation are the housing policies H2 (multi developer and piecemeal delivery), H6 (estate regeneration) and H12 (build to rent). All these policies will have a positive impact on the deprivation objective as relate to improving the affordability of housing. EN4 (energy reduction in new homes) will also have a beneficial impact by helping to reduce fuel bills and thus fuel poverty.</p> <p>The only negative effect that is predicted relates to the potential reduction in affordable housing that is associated with policy V8 (vacant building credit).</p> <p>Overview: Overall, the various elements of the Draft Local Plan will have a highly beneficial impact upon the deprivation objective. These effects are not likely to change over time.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
6 Education	<p>Strategic objectives: Education an issue addressed with directly by Strategic Objective 2 (Infrastructure). It is therefore highly compatible with the education objective. In addition, it was felt that the education objective is indirectly compatible with (or has an uncertain relationship with) all other strategic objectives in the Draft Local Plan (see Table 8). This is caused by the general expectation that meeting educational needs will complement development needs.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the education objective can be seen in Table 14. A highly positive score is recorded to reflect the proposals for new schools, expansion plans of existing schools and safeguarding of land for existing schools to expand in the future.</p> <p>Across the parishes and sites, the most positive effects on the education objective are expected from site allocation policies AL/RTW 18, AL/RTW 27, AL/CA 1, AL/CA 2, AL/CA 3 (aka AL/PW 1), AL/CRS 10, AL/CRS 17, AL/HA 4 and AL/SP 2. The provision for new schools in these policies will be critical in delivering the housing development needs for the borough.</p> <p>Negative cumulative effects are expected within Speldhurst, Goudhurst, Hawkhurst and Cranbrook and Sissinghurst parishes where there would be increased pressure on the local primary schools without any firm commitment to expand (safeguarding land only). However, it is noted that Speldhurst primary has plans for expansion outside of the Draft Local Plan process.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the education objective can be seen in seen in Table 18 and Table 19. Highly positive impacts on the education objective are expected from all these strategic policies except for STR 5 (Infrastructure), STR 6 (Transport) and STR 8 (Environment) which would not address education issues directly. No negative scores are recorded.</p> <p>DM policies: There are no DM policies that address education issues specifically.</p> <p>Overview: Overall, the various elements of the Draft Local Plan will have a beneficial impact upon the education objective. Site allocation policies that deliver new schools are critical to maintaining this score. The long-term impacts of the Draft Local Plan are more difficult to predict as the popularity of local primary schools changes over time.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
7 Employment	<p>Strategic objectives: The employment objective is compatible with (or has an uncertain relationship with) all strategic objectives in the Draft Local Plan (see Table 8). This is caused by the expectation both within the Draft Local Plan and as a fundamental principle of sustainable development that the economy is supported and a strong economy will ensure there is a good supply of jobs.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the employment objective can be seen in Table 14. A highly positive score is recorded to reflect the substantial number of new jobs that would be created.</p> <p>Positive effects on the employment objective are seen across the parishes and sites. The most positive effects are expected from site allocation policies AL/RTW 1-4, AL/RTW 12-15 and AL/RTW 19 reflecting the explicit requirement for employment uses on these sites and the location of the sites near to wards with existing high unemployment rates. No negative effects are expected from site allocations.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the employment objective can be seen in seen in Table 18 and Table 19. Highly positive impacts on the employment objective are expected from all these strategic policies except for STR 5 (Infrastructure), STR 6 (Transport) and STR 8 (Environment) which would not address employment issues directly. No negative scores are recorded.</p> <p>DM policies: The most important development management policies for the employment objective are the employment policies ED 1 – ED 7. All these policies have a highly positive impact. Further key policies that have relevance to employment are H 10 (rural worker’s dwellings), the Town, Rural Service, Neighbourhood and Village Centres policies ED 8 – ED 12 and the transport policies TP 1 – TP 6. All these policies protect and improve business premises and transport infrastructure to the benefit of local employees.</p> <p>No negative effects were recorded.</p> <p>Overview: The various elements of the Draft Local Plan will have a highly beneficial impact upon the employment objective.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
8 Equality	<p>Strategic objectives: Equality is not an issue that is addressed directly by the strategic objectives. However, it was felt that the equality objective is indirectly compatible with (or has an uncertain relationship with) all strategic objectives in the Draft Local Plan (see Table 8). This is caused by the general expectation within the Draft Local Plan would meet social needs and take into account local opinion. In this sense, Strategic objective 10 (Neighbourhood Planning) is particularly relevant. No conflicts were identified.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the equality objective can be seen in Table 14. A highly positive score is recorded to reflect the fact that major development would be accompanied by benefits to social mobility and inclusion.</p> <p>Across the parishes and sites, the most positive effects on the equality objective coincide with sites that have the best access provision and thus are mostly recorded in RTW, AL/SO 1 and AL/CA 1. Negative scores are recorded for site allocation policies AL/SO 3, AL/CRS 6, AL/CRS 15, AL/CRS 16, AL/HA 9, AL/BE 4 and AL/SP 1. This largely reflects the more rural nature of these allocations being less suited to those with disabilities.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the equality objective can be seen in seen in Table 18 and Table 19. Highly positive impacts on the equality objective are expected from all these strategic policies except for STR 5 (Infrastructure), STR 6 (Transport) and STR 8 (Environment) which would not address equality issues directly. No negative scores are recorded.</p> <p>DM policies: The housing policies are of most relevance to the equality objective. Benefits are seen particularly with Policy H9 (housing accessibility) which although focused on older persons, could equally be applied to disabled persons. In addition, policies ED 12 (retention of local services and facilities) and TP 2 (transport design and accessibility) are also likely to bring benefits as they ensure communities are well serviced and accessible.</p> <p>No negative effects were recorded.</p> <p>Overview: Overall, the various elements of the Draft Local Plan will have a beneficial impact upon the equality objective.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
9 Health	<p>Strategic objectives: The topic of health and wellbeing is not considered directly by the strategic objectives. However, the health objective is expected to be compatible with (or have an uncertain relationship with) all strategic objectives in the Draft Local Plan (see Table 8). For example, protection and provision of an enriched environment and locality from Strategic Objectives 5 (Vibrant Borough) and 6 (Environment) would have a beneficial impact on wellbeing.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the health objective can be seen in Table 14. A highly positive score is recorded to reflect the high proportion of residents that would be able to reach accessible natural greenspaces as a result of the distribution pattern chosen.</p> <p>Positive effects on the health objective are also seen across the parishes and sites. The most positive effects are expected from site allocation policies in RTW town centre, AL/SO4, AL/CA 1, reflecting the explicit requirement for health uses on these sites and the location of the sites near to wards with existing high health rates. No negative effects are expected from site allocations.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the health objective can be seen in seen in Table 18 and Table 19. Highly positive impacts on the health objective are expected from all these strategic policies except for STR 6 (Transport). This is because improvements in active travel would be offset with a deterioration in local air quality. No negative scores are recorded.</p> <p>DM policies: Numerous DM policies have a positive effect on the health objective. The most important policies are the environment and design policies EN 1, EN 2, EN 5 – 7, the natural environment policies EN 11, EN 12 and EN 14 – 18, policy H 9 (Accessible Housing), transport policies TP 1 - 2 , and open space policies OSSR 1 - 2. Whist other policies overlap with the health objective, it was felt that any effects were adequately considered by different sustainability appraisal objectives (for example air quality).</p> <p>No policies have a negative impact upon health.</p> <p>Overview: The various elements of the Draft Local Plan will have a highly beneficial impact upon the health objective.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
10 Heritage	<p>Strategic objectives: The heritage objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) – see Table 8. This is because the large amount of residential development planned in both rural and urban locations is likely to result in a risk of harm to designated or non-designated heritage assets. Strategic Objective 6 (Environment) addresses heritage issues directly by offering ‘protection to value heritage’.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the heritage objective can be seen in Table 14. A slightly negative score is recorded to reflect the balance between the small number of positive effects and large number of negative effects from site allocations across the borough.</p> <p>Across the parishes and sites, the most positive effects on the heritage objective are expected from site allocation policies:</p> <ul style="list-style-type: none"> • AL/SO 3 (reflecting the concept of a scattered development pattern inspired by historical character of the AONB etc.); • AL/SO 4 (restoration of Mabledon House which is grade II listed); and, • and AL/CRS 11 (offer protection to Sissinghurst Castle which is grade I listed) <p>The more negative effects are expected from site allocation policies AL/RTW 1, AL/RTW 18, AL/CRS 4 and AL/CRS 9 reflecting the compromised setting of heritage assets or the historic landscape.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the heritage objective can be seen in Table 18 and Table 19. These strategic objectives are expected to mostly bring about highly positive impacts on the heritage objective. STR 8 (Environment) addresses heritage issues directly in a similar way to Strategic Objective 6 (Environment), while the remaining positive scores are assigned to reflect the expectation that the strategic policies would be in line with sustainable development goals either through the use of sustainability design standards (STR 7) or a more holistic master planning-style approach (STR 3). The only strategic objective not to score positively for heritage was STR 4 (Green Belt) which is given a negative score. This score was determined following a cumulative impact assessment of the heritage impacts associated with the specific sites that are intended for release from the Green Belt area.</p> <p>DM policies: Numerous DM policies have a positive effect on the heritage objective. The most important policies are the environment and design policies EN 1, EN 6 – 10, the natural environment policies EN 15, EN 17, EN 19 - 21, housing policy H 14, Employment policy ED 4 and transport policy TP 5. All these policies offer specific protection and/or enhancement to the historic environment. Only policy TP 6 (A228 Strategic Link) scores negatively for heritage due to the sensitivity of the locality.</p> <p>Overview: The various elements of the Draft Local Plan will have a mixed effect on heritage overall. The unavoidable negative consequences of building a large number of new dwellings are fully recognised and are being mitigated to some extent through policy either strategically for the borough or at the level of site specifics by development management. Multiple synergistic effects exist in relation to this objective. For example, preservation of the historic environment will have positive repercussions for landscape and wellbeing.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
11 Housing	<p>Strategic objectives: The Housing objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan (Table 8). This is because the large amount of residential development planned is fundamental to the Draft Local Plan.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the housing objective can be seen in Table 14. A highly positive score is recorded to reflect the reasons given above.</p> <p>As would be expected, across the parishes and sites, the most positive effects on the Housing objective are assigned to the sites that would deliver the highest numbers of housing. For this reason, policies AL/CA 1 and AL/CA 3 (aka AL/PW 1) are extremely beneficial to the borough. Highly positive effects are recorded in many rural settlements too for example Horsmonden, Hawkhurst and Cranbrook.</p> <p>No negative effects are expected from the site allocation policies.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the Housing objective can be seen in Table 18 and Table 19. These strategic objectives are expected to mostly bring about highly positive impacts on the Housing objective. Delivery of housing is inherent to all Strategic Objectives except STR 6 (Transport) and STR 8 (Environment) which have been written to manage the impact of new development and enhance existing assets.</p> <p>DM policies: Within the DM policies is a suite of new policies specially focussed on delivering the right type of housing for the borough. No negative effects are predicted on the housing objective.</p> <p>Numerous DM policies have a positive effect on the Housing objective.</p> <p>Overview: The various elements of the Draft Local Plan will have an extremely beneficial effect on the housing objective overall. In addition, synergistic effects exist in relation to this objective. For example, building a substantial number of new homes will provide new customers for existing businesses, a new source of local employees, in some cases may bring about regeneration benefits.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
12 Land use	<p>Strategic objectives: The Land Use objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) and Strategic Objective 9 Garden Settlement (see Table 8). These incompatibilities are created by the large amount of residential development planned in both rural and urban locations that will require substantial areas of greenfield land and loss of soils. Objective 7 (Green Belt) is assigned a mixed score and it involved both loss and protection of Green Belt land.</p> <p>Strategic Policies and Site Allocations: The impact of STR 1 (Spatial Development Strategy) on the Land Use objective can be seen in Table 14. A negative score is recorded to reflect the substantial losses of greenfield land and limited development on brownfield sites.</p> <p>The impact of strategic objectives (STR 2-STR 10) on the Land Use objective can be seen in Table 18 and Table 19. Approximately half of the strategic objectives are predicted to have a positive effect on the Land Use objective. The remaining strategic objectives are expected to have mostly neutral or unknown effects.</p> <p>The only strategic objective that scored negatively for Land Use was STR 4 (Green Belt). This score was determined following a cumulative impact assessment of the Land Use impacts associated with the specific sites that are intended for release from the Green Belt area. As can be seen in Appendix D, some of the sites chosen for Green Belt release have been judged by the Green Belt study to contribute only very weakly to the 5 purposes of the Green Belt. Whereas others, like the strategic releases in Paddock Wood and Capel, and policies RTW 18 and AL/RU 1, will have a more negative impact by virtue of their scale or the sensitivity of the location. Across the borough, the total area of Green Belt to be released is approximately 4-5% of existing Green Belt (see AONB and Metropolitan Green Belt Allocations Summary v1). However, the in-combination effect of the specific sites chosen is expected to be highly negative.</p> <p>Across the parishes and sites, the most positive effects on the Land Use objective are expected from site allocation in RTW, Pembury, Southborough and Paddock Wood on previously developed land. In the more rural settlements this effect is only seen on one site: AL/BE 4.</p> <p>DM policies: A range of DM policies are predicted to have a positive effect on the Land Use objective. The most important policies are the natural environment policies EN 17, EN 22, housing policy H6 and employment policies ED 4-6. This is due to the protection these policies offer to greenfield land.</p> <p>Only policy TP 6 (A228 Strategic Link) scores negatively for Land Use due to the loss of greenfield land, soils and Green Belt release.</p> <p>Overview: Overall, the various elements of the Draft Local Plan will have a negative effect on the Land Use objective. The unavoidable negative consequences of building a large number of new dwellings are fully recognised and are being mitigated to some extent through policy either strategically for the borough or at the level of site specifics by development management. Multiple synergistic effects exist in relation to this objective. For example, preservation or efficient use of greenfield land will have positive repercussions for biodiversity, heritage, landscape, water and health and wellbeing.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
13 Landscape	<p>Strategic objectives: The Landscape objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) (see Table 8). These incompatibilities are created by the large amount of residential development planned in both rural and urban locations much of which will alter the setting of the sensitive landscape of the High Weald AONB or Character Area. However, Strategic Objective 6 (Environment) offers protection to “valued natural environment including the AONB”.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the Landscape objective can be seen in Table 18 and Table 19. These strategic objectives are mostly expected to bring about highly positive impacts on the landscape objective. STR 8 (Environment) addresses landscape issues directly in a similar way to Strategic Objective 6 (Environment), while the remaining objectives are mostly in line with sustainable development goals either through the use of sustainability design standards (STR 7) or a more holistic master planning style approach (STR 3). The only strategic objective that scored negatively for Land Use was STR 4 (Green Belt). This score was determined following a cumulative impact assessment of the Landscape impacts associated with the specific sites that are intended for release from the Green Belt area. As can be seen in Appendix D, the extent of the negative scores varies from site to site (and a positive effect is predicted from site allocation AL/SO 3) reflecting the scale of development and the varying sensitivity of the site locations within the AONB. Across the borough, the total area of AONB to be allocated for development is approximately 0.7% (see AONB and Metropolitan Green Belt Allocations Summary v1). However, the in-combination effect of the specific sites chosen is expected to be highly negative.</p> <p>Site Allocations and STR 1: As for the cumulative impact from release of Green Belt sites, the cumulative impact on the Landscape objective of all allocated sites (equivalent to STR 1) is expected to be highly negative. Across the parishes and sites, positive effects on the landscape objective are rare and coincide with sites allocated outside the AONB (AL/RTW 3, AL/SO 1 and AL/PW 2). However, it is worth noting that AL/SO 3 is within the AONB and score positively reflecting the highly sympathetic, high quality design that would be in keeping with the existing settlement pattern. As would be expected, negative scores are recorded for many sites within the AONB with the parishes of Cranbrook and Sissinghurst, Hawkhurst, Brenchley and Matfield, Horsmonden and Pembury being the worst affected. Despite being outside of the AONB, Capel and Paddock Wood are also scored negatively to reflect the scale of the development proposed.</p> <p>DM policies: Many of the Environment and Design, and Natural Environment policies are predicted to have a positive effects on the landscape objective with policies EN 15 – 21 being particularly beneficial. Only two policies are expected to have a negative effect: H13 (Gypsies and Travellers) and TP 6 (A228 Strategic Link). Both policies would allow for allocation in a sensitive landscape.</p> <p>Overview: Overall, the various elements of the Draft Local Plan will have a negative effect on the Landscape objective. The unavoidable negative consequences of building a large number of new dwellings are recognised and are being mitigated to some extent through policy either strategically for the borough or at the level of site specifics by development management and allocation policies. Multiple synergistic effects exist in relation to this objective. For example, protection and enhancement of the landscape is likely to have positive repercussions for biodiversity, heritage, land use, water and health and wellbeing.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
14 Noise	<p>Strategic objectives: The Noise objective is compatible with (or has no relationship/an uncertain relationship with) most strategic objectives in the Draft Local Plan (see Table 8). Uncertain relationships are recorded for the Infrastructure, Vibrant Borough, Green Belt and Garden Settlement objectives to reflect the fact that significant noise impacts can not be determined without locational information. However, Strategic Objective 3 (Travel) addresses noise issues directly by prioritising quieter travel modes over the use of private cars and embracing technology such as electric vehicles.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the Noise objective can be seen in Table 14. A mixed score is recorded to reflect the wide range in scores across the parishes and settlements, with many rural areas being assigned a neutral score and urban areas, a negative score.</p> <p>Across the parishes and sites, positive effects on the Noise objective are expected from site allocation policies TP 6 (A228 strategic link) and HA 1 (Hawkhurst relief road) to reflect improvements for existing residents by relocating large volumes of traffic. The worst effects are expected from site allocation policies in RTW, Paddock Wood, Pembury and Capel reflecting both the large volumes of new traffic that would be created and the impact of existing noise on those living in new dwellings.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the Noise objective can be seen in Table 18 and Table 19. These strategic objectives are expected to mostly bring about highly positive impacts on the Noise objective by being in line with sustainable development goals (either through the use of sustainability design standards e.g. STR 7 or a more holistic master planning-style approach e.g. STR 3. STR 8 (Environment) would not address noise issues directly and STR 4 (Green Belt) would result in a negative effect on the Noise objective reflecting the range of scores across development sites allocated within the Green Belt.</p> <p>DM policies: The most important development management policies for Noise are Policies EN 30 (Noise) and the Transport policies TP 1 and TP 2 which address noise issues directly. There are no negative impacts upon the Noise objective.</p> <p>Overview: The various elements of the Draft Local Plan will have a mixed effect on Noise overall. The unavoidable negative consequences of building a large number of new dwellings are fully recognised and are being mitigated to some extent through policy either strategically for the borough or at the level of site specifics by development management. Multiple synergistic effects exist in relation to this objective. For example, active travel improvements have benefits to climate change, health, travel choice, equality (by giving options for elderly/disabled) and air quality. Over time, as government invests more in electric vehicles and associated infrastructure, it is expected that impacts from noise could decline. This change is expected to be noticed within the plan period.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
15 Resources	<p>Strategic objectives: The Resources objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) – see Table 8. This is because the construction of a large number of new dwellings will require substantial volumes of materials. No strategic objective addresses this issue directly. However, Strategic Objective 8 (Climate Change) could ensure impacts are reduced in its commitment to ‘ minimise the impact of development on the environment’.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the Resources objective can be seen in Table 14. An unknown score is recorded to reflect the fact that choice of materials during construction would be determined at development management stage.</p> <p>This scoring logic is largely repeated across the parishes and sites, with slight adjustments where demolition of existing development is either required or avoided.</p> <p>Strategic Policies 2 - 10: The effect of strategic objectives (STR 2-STR 10) on the Resources objective can be seen in seen in Table 18 and Table 19. These strategic objectives are expected to mostly bring about highly positive impacts on the Resources objective by being in line with sustainable development goals (either through the use of sustainability design standards e.g. STR 7 or a more holistic master planning-style approach e.g. STR 3. STR 6 (Transport) and STR 8 (Environment) would not address resources issues directly thus are scored a neutral and STR 5 (Infrastructure) would result in an unknown effect on the Resources objective reflecting the requirement for locational information if demolition requirements are to be assessed.</p> <p>DM policies: The most important development management policies for the Resources objective are Policies EN 1 – 3 and H 14 and ED 5 which relate to sustainable design and encouraging reuse of existing buildings. The remaining DM policies are mostly scored neutral with the exception of policy H6 (Estate Regeneration) which is slightly negative to reflect the underlying expectation that some demolition may be necessary.</p> <p>Overview: Together, the various elements of the Draft Local Plan will have a slightly positive effect on the Resources objective. The greatest influence upon this objective will be at Development Management stage and the above mentioned policies will ensure a positive effect is seen. Synergistic effects from this objective are possible in the form of a reduction in embodied carbon from a more sustainable choice of materials providing a benefit to the climate change and energy objective.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
16 Services & Facilities	<p>Strategic objectives: The Services and Facilities objective is expected to be compatible with (or have an uncertain relationship with) all strategic objectives in the Draft Local Plan (see Table 8). In particular, Strategic Objective 2 (Infrastructure) directly addresses the expectation that ‘the delivery of all forms of infrastructure’ would be achieved by the Draft Local Plan.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the Services and Facilities objective can be seen in Table 14. A highly mixed score is recorded to reflect the negative impacts in rural settlements and positive impacts in urban settlements (dictated by provision of existing services and facilities).</p> <p>As would be expected, the most positive effects are expected from site allocation policies in RTW town centre, Southborough, Paddock Wood and Capel. The most negative effects are found at Benenden (especially AL/BE 4), Matfield, Frittenden, Goudhurst, Lamberhurst and Sandhurst.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the Services and Facilities objective can be seen in seen in Table 18 and Table 19. Highly positive impacts on the Services and Facilities objective are expected from all these strategic policies except for STR 4 (Green Belt) and STR 8 (Environment) which are scored as mixed (to reflect the range of scores on Green Belt release sites) and neutral (to reflect the lack of relationship) respectively.</p> <p>DM policies: Numerous DM policies have a positive effect on the Services and Facilities objective. The most important policies are the employment policies ED 2 – 4, and ED 7, and the Town and Rural Service policies ED 8 – 12 which offering protection in one form or another to existing services and facilities.</p> <p>No policies have a negative impact upon the Services and Facilities objective.</p> <p>Overview: Overall, the various elements of the Draft Local Plan will have a mixed impact upon the Services and Facilities objective. Synergistic effects from this objective take the form of improvements to services and facilities having positive impacts on the other economic objectives of Business Growth and Employment.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
17 Travel	<p>Strategic objectives: The Travel objective is expected to be compatible with (or have an uncertain relationship with) all strategic objectives in the Draft Local Plan (see Table 8). In particular, Strategic Objective 3 (Travel) directly addresses the expectation that appropriate modes of travel are planned for.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the Travel objective can be seen in Table 14. A highly mixed score is recorded to reflect the negative impacts in rural settlements and positive impacts in urban settlements (dictated by provision of existing travel options).</p> <p>As would be expected, the most positive effects are expected from site allocation policies in RTW town centre, Southborough, Paddock Wood and Capel. The most negative effects are found at Benenden (especially AL/BE 4), Frittenden and Sandhurst.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the Travel objective can be seen in seen in Table 18 and Table 19. Highly positive impacts on the Travel objective are expected from all these strategic policies except for STR 4 (Green Belt) and STR 8 (Environment) which are scored as mixed (to reflect the range of scores on Green Belt release sites) and neutral (to reflect the lack of relationship) respectively.</p> <p>DM policies: Numerous DM policies have a positive effect on the Travel objective. The most important policies are the transport policies TP 1 – TP 6 which cover a wide range of travel issues from active and sustainable travel to safeguarding of railways.</p> <p>No policies have a negative impact upon the Travel objective.</p> <p>Overview: Overall, the various elements of the Draft Local Plan will have a mixed impact upon the Travel objective. Synergistic effects from this objective take the form of improvements to Travel having positive impacts on economic objectives of Business Growth and Employment and the environmental objective of Noise, Air and Climate Change.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
18 Waste	<p>Strategic objectives: The Waste objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except (see Table 8). None of the Strategic Objectives address this issue directly.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the Waste objective can be seen in Table 14. Despite a large volume of new waste being created by the occupation of a large number of new dwellings, a neutral score is applied to reflect the inability of site allocation policies to influence the diversion of household and construction waste from landfill. This score is repeated across all the parishes and sites.</p> <p>Strategic Policies 2 - 10: The effect of strategic objectives (STR 2-STR 10) on the Waste objective can be seen in seen in Table 18 and Table 19. These strategic objectives are expected to mostly bring about neutral or highly positive impacts on the Waste objective by being in line with general sustainable development goals. STR 4 (Green Belt), STR 5 (Infrastructure), STR 6 (Transport) and STR 8 (Environment) would not address waste issues directly thus are given a neutral score.</p> <p>DM policies: The most important development management policies for the Waste objective are Policies EN 2 – 3 which relate to sustainable design. Other DM policies are given largely neutral scores and no policies have a negative impact.</p> <p>Overview: Together, the various elements of the Draft Local Plan will have a neutral effect on the Waste objective. The greatest influence upon this objective will be at Development Management stage and the above-mentioned policies will help ensure a positive effect is seen. However, this effect is not deemed to be significant. Synergistic effects from this objective are possible in the form of a reduction in waste bringing about less vehicles movements for waste collection and thus reduced carbon dioxide emissions from transport. Again though, this effect is not deemed to be significant. In the future, household waste diverted from landfill could increase in the future as more recycling streams become available.</p>

Sustainability Objective	Discussion of Significant Effects and Contribution Towards Sustainable Development
19 Water	<p>Strategic objectives: The Water objective is compatible with (or has no relationship/an uncertain relationship with) all strategic objectives in the Draft Local Plan except Strategic Objective 4 (Housing) – see Table 8. This is principally because the large number of new dwellings will put increased pressure on existing water supplies. None of the strategic objectives address the issues relating to water directly but Strategic Objective 6 (Environment) describes protection of the borough’s ‘valued natural environment’. The water environment would form part of this.</p> <p>Site Allocations and STR 1: The impact of STR 1 (Spatial Development Strategy) on the Water objective can be seen in Table 14. A mixed score is recorded overall to reflect the negative impacts on supply and cumulative flood risk, the positive impacts from the planned betterment of flooding issues at Paddock Wood and Five Oak Green. For these reasons, the most positive effects on the Water objective across the parishes are expected from site allocation policies AL/CA 1, AL/CA 3 (aka AL/PW 1). The other allocated sites in the borough are scores mostly neutral with slight variations reflecting risk to flooding, groundwater source protection zones and the scale of development affecting pressure on supplies.</p> <p>Strategic Policies 2 - 10: The impact of strategic objectives (STR 2-STR 10) on the Water objective can be seen in seen in Table 18 and Table 19. These strategic objectives are mostly expected to bring about highly positive impacts on the Water objective. STR 8 (Environment) addresses water issues directly in a similar way to Strategic Objective 6 (Distinctive Environment), while the remaining objectives are mostly in line with sustainable development goals either through the use of sustainability design standards (STR 7) or a more holistic master planning style approach (STR 3). STR 4 (Green Belt) would result in an overall mixed effect on the Water objective reflecting the range of scores across development sites allocated within the Green Belt.</p> <p>DM policies: The most important development management policies for Water are EN 26 (Water Quality, Supply and Treatment), EN 27 (Conservation of Water Resources), EN 28 (Flood Risk) and EN 29 (Sustainable Drainage), all of which are given highly positive scores to reflect their emphasis on avoiding and mitigating flood risk and reducing water consumption. No policies have been given negative scores for the Water objective.</p> <p>Overview: Together, the various elements of the Draft Local Plan will have a mixed effect on the Water Objective reflecting the increased pressure on water resources and the betterment to flood risk. DM policy to restrict water consumption to 110 litres per person per day will be beneficial but it will not be enough to make a significant difference. Synergistic effects relating to the Water objective take the form of improvements for biodiversity and climate change adaptation. Over time, water shortages are more likely in future as a result of climate change. There is currently no indication that utility companies are sufficiently addressing this problem thus problems may develop where large development is planned.</p>

11 Monitoring

11.1 Need for Monitoring

- 11.1.1 The next step following formation of a new Plan and accompanying SA is to monitor the effects of the Plan. Monitoring is a key mechanism to ensure that the implementation of the policies and proposals is consistent with the sustainable aspirations of the Draft Local Plan. 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.
- 11.1.2 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.

11.2 Proposed Measures for Monitoring

- 11.2.1 Table 75 below sets out suggested monitoring indicators that could identify whether the overall sustainability aims and objectives of the Draft Local Plan are being delivered.

Table 75. Monitoring Indicators to determine whether sustainability aims are being delivered.

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	Number of developments generating adverse effects on sites recognised for biodiversity value (including local sites as well as Sites of Special Scientific Interest (SSSIs)) Number of developments generating biodiversity enhancement including GI	TWBC
Business Growth	3. Encourage business growth and competitiveness	Floor space targets for New Local Plan.	TWBC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Climate Change & Energy	4.Reduce carbon footprint and adapt to predicted changes	Grading of Energy Performance Certificates. Number of public EV charge points. Number of renewable energy schemes.	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
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.	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	TWBC
Noise	14.Reduce noise pollution	Tranquillity maps Noise maps	CPRE DEFRA

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Resources	15.Reduce the impact of resource consumption	% of relevant applications where demolition is avoided % of relevant applications where materials are sourced responsibly	TWBC
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
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.	EA

11.2.2 For the purpose of derivation of the sustainable indicators for the Draft Local Plan, monitoring sustainability indicators could be analysed using the following sources:

The sources of information for the monitoring of the sustainability impacts are listed below:

- KCC Business Intelligence Publications including aspects of population, poverty, housing, economy and employment (broken down into borough level data)
- Internal TWBC monitoring including the five-year housing land supply and a review of planning applications within or near to environmental constraints
- Various additional sources already listed within Appendix B of the Stage A Scoping Report

11.2.3 This list can be refined as the Local Plan process progresses towards Reg 19.

12 Appendices

Appendix A - Decision-aiding questions used for scoring SA objectives

Table 76. Decision-aiding questions used for scoring sustainability objectives

Topic	Objective	Decision-aiding questions: Does the Policy/ Plan/ Objective?	Weighting	Comments / Limitations
Air	1. Reduce air pollution	...help meet NO ₂ and PM ₁₀ targets along the A26 in Royal Tunbridge Wells?	HIGH Legislatively driven.	Consideration was given to what extent a development was likely to increase traffic in the AQMA (or in the AQMA of neighbouring authorities)
		...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options?		The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - or + >150 dwellings: - - or + +
		...promote forms of active travel including cycling and walking?		Desirable travel distances ¹¹ were considered. Where a site was within desirable walking distance, the following guide was implemented for residential dwellings: <50 dwellings: + >50, <150 dwellings: + + >150 dwellings: + + + Where a site was not well located or outside of desirable walking distance, the following guide was implemented for residential dwellings: <1km - (<50 dwellings), - - (>50 dwellings) >1km - - (<50 dwellings), - - - (>50 dwellings)
		...help reduce premature deaths from poor air quality (cause by PM _{2.5})?	HIGH Lives at stake.	Consideration was given to sensitive receptors.
Biodiversity	2. Protect and enhance biodiversity and the natural environment	...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA and undesignated habitat)?	MEDIUM Many sites are finite habitats	Undesignated habitat includes corridors, networks and linking routes. Consideration of whether a site would protect or improve a site of biodiversity value, or whether there is a risk of degradation or loss.
		...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations?	HIGH Ashdown Forest is of international significance	Consideration of whether likely significant effects will occur and whether effective mitigation is available (SANGS/SAMMS)
		...support work to improve condition of SSSIs?	HIGH SSSIs are of national significance	Consideration of whether a site would protect or improve a SSSI, or whether there is a risk of degradation or loss. Impact Risk Zones are taken into account.
Business Growth	3. Encourage business growth and competitiveness	...help support existing business and the growth of new businesses?		Consideration of the four reasons for business decline in the borough: broadband speeds, suitability of premises, useful transport links and availability of staff. In most cases the contribution of new customers to support existing business was considered insignificant.
		...support growth of the local economy from professional and financial services,		Where construction services would be supported on a temporary basis only, no benefit was recorded.

¹¹ CIHT define desirable walking distances as follows:

town centre = 200m

commuting/school = 2000m

elsewhere = 1200m

Topic	Objective	Decision-aiding questions: Does the Policy/ Plan/ Objective?	Weighting	Comments / Limitations
		health and education, and construction-related activities.		
		...prevent loss of economic floor space in preference for housing and other non employment generating used within Key Employment Areas and other well located employment sites (where appropriate)?		Scores adjusted to reflect the scale of economic floor space that would be lost or gained.
		...recognise and help develop the rural economy?		Impacts on rural economy from loss of agriculture not considered significant unless large scale losses were proposed.
Climate Change & Energy	4.Reduce carbon footprint and adapt to predicted changes	...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures?		Small development (<50 dwellings) was deemed unlikely to provide significant adaptation. For larger development, benefits would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.
		...support reduction in carbon and energy so targets are consistently met?	HIGH Targets are currently not being met.	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: -- >500 dwellings: ---
		...support opportunities to utilise biomass in the borough?		Consideration was given to existing local air quality, with areas of poor air quality considered inappropriate locations for biomass. In other areas, benefits would depend on successful implementation of DM policy and development priorities. For this reason, an unknown score was often applied.
		...support opportunities to install community heating schemes?	LOW Opportunities are limited	Consideration was given to viability and practical constraints such as reliable heat sources. This sort of heating scheme is unlikely to be possible for small settlements.
Deprivation	5.Reduce poverty and assist with regeneration	...address pockets of deprivation and encourage regeneration?		Regeneration was considered to be development in a location that is run-down and without purpose.
		...reduce rates of fuel poverty?		New dwellings would be built to more stringent energy efficiency standards than existing. However, they are likely to be unaffordable to lower incomes residents who may also suffer from fuel poverty so benefit unlikely to be seen. For this reason, most new development did not have an impact upon this issue.
Education	6.Improve educational attainment and enhance the skills base	...meet demand for school places?		Consideration of local circumstances including the ratio of applicants to places at the nearest primary school (average taken for last 5 years) and scale of potential residential development.
		...continue to support a high proportion of highly qualified residents?		Consideration of the provision of adult education centres.
Employment	7.Facilitate and support employment	...improve employment opportunities in key wards?	LOW Unemployment in borough is very low	Consideration of employment opportunities in terms of their provision, access via public transport and potential for developing new skills. Where job creation is likely, scores improve in wards with relatively high unemployment rates at present (St James and Sherwood). Many proposed development sites score

Topic	Objective	Decision-aiding questions: Does the Policy/ Plan/ Objective?	Weighting	Comments / Limitations
	opportunities		generally	a + to reflect the temporary jobs created by construction.
Equality	8.Increase social mobility and inclusion	...improve physical activity rates for low income population groups?		Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.
		...improve social mobility problems caused by selective grammar schools?		Fee paying schools were ignored in this consideration. The county council offers free transport to the nearest appropriate school over 3 miles. Thus 3 miles was used as a cut off. Where there was choice of non selective schools within 3 miles, positive scores were applied. Where the nearest non selective school was over 3 miles and one or more selective schools were closer by, negative scores were applied.
		...promote independent access to facilities for people with mobility, sensory and cognitive impairments?	HIGH Legislatively driven.	Independent access was considered possible where facilities could be reached safely with the use of a car. Desirable walking distances were not applicable to this objective. Instead, distances of 1 mile or greater were considered inconvenient and scored negatively.
Health	9.Improve health and wellbeing, and reduce health inequalities	...meet demand for elderly care services?	HIGH Growing elderly population.	This objective considered the potential for C2 use.
		...improve physical activity rates for at risk population groups?		This objective was scored where high populations of at risk groups lived i.e. RTW, Southborough, Paddock Wood and Cranbrook. Measures considered necessary to improve physical activity rates included leisure centres, improved sports provision and outdoor gyms/open space.
		...address pockets of health deprivation and specialist health needs?		Pockets of health deprivation have been recorded in Hawkhurst, Sandhurst, Benenden, Cranbrook, Pembury, Sherwood, Southborough, High Brooms, Rusthall, Broadwater and St James. Specialist health care needs included provision for cancer, mental illness, stroke and asthma sufferers.
		...meet need for accessible green open space and recreation facilities for all?	HIGH TWBC is already behind on these standards	Scores applied depending on the extent to which a proposal or location meets all of the ANG standards. Where none are met, the distance to, and size of, the nearest area determined how negative the score should be.
		...ensure residents can access heritage assets?		Consideration of accessibility related to provision (or lack of) pedestrian routes and new modes of travel or access routes.
Heritage	10.Preserve and enhance historical and cultural heritage assets	...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance?	HIGH Assets and settings are often finite or hard to restore once lost.	Scores reflected protection (or risk to protection) and the extent of harm or enhancement that would result.
		...provide a framework for a positive heritage strategy including enhancements in line with NPPF?		This score was applied where specialist heritage advice identified opportunities.
Housing	11.Provide sufficient housing to meet identified needs	...meet identified needs for affordable housing?	HIGH Housing demands are in borough are not being met.	The following guide was implemented for residential dwellings to reflect the high need in all locations: <50 dwellings: 0 50 - 150 dwellings: + + >150 dwellings: + + +
		...meet demand for independently accessible housing and housing suitable for older people?	HIGH Housing demands are in borough are	Successful adoption and implementation of DM policy would determine whether housing is accessible. Housing suitable for older people considered safe distance to local facilities and services.

Topic	Objective	Decision-aiding questions: Does the Policy/ Plan/ Objective?	Weighting	Comments / Limitations
			not being met.	
		...meet demand for 2 and 3 bed market housing to suit expanding families?	HIGH Housing demands are in borough are not being met.	DM Housing Mix Policy would address this where it is relevant to local needs.
		...make allowances in housing targets due to environmental constraints in the borough?		Scores were applied to reflect whether the degree to which a high quantum of development was reduced to provide environmental protection.
Land use	12.Protect soils, and reuse previously developed land and buildings	...protect Green Belt?		Consideration given to whether a policy would detract or respect/enhance the 5 purposes of the Green Belt.
		...develop on previously developed in preference to greenfield land?		Positive scores were applied to policies that proposed development on brownfield land and negative to those on greenfield land (with consideration of scale of greenfield land lost and location of brownfield land).
		...prioritise development on lower grade agricultural soils?		Consideration of the area of soils that are lost or protected where the loss or protection of >20ha of best and most versatile soils is scored as - - - or + + + respectively.
Landscape	13.Protect and enhance landscape and townscape ¹²	...protect and enhance the High Weald AONB and historic landscape?	Great weight as per NPPF	Consideration of risk to or protection of AONB features and the scale/setting/pattern of development.
		...protect and enhance ancient woodland and 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?	HIGH AW is a finite habitat	Consideration of the risk to or protection of these features alongside availability of management opportunities.
		...strengthen Green Infrastructure?		
		...protect and enhance landscape and townscape character and quality?		Judgement of whether impacts are likely to be adverse or positive and to what extent. Landscape character sensitivity also considered.
Noise	14.Reduce noise pollution	...consider noise pollution in Important Areas for Road Noise?		Includes a consideration of both new noise generation and experience of existing noise by receptors. The following score guide was for implemented for residential dwellings: Adjacent: - Adjacent and >100: - - Adjacent and > 500: - - - DEFRA noise maps were viewed
		...consider noise pollution from aircraft and trains?		Consideration of the extent to which residential development is located within the main Gatwick flight path or near to mainline railway, and the provision of mitigation to improve the existing situation.
Resources	15.Reduce the impact of	...prevent unsustainable demolition and rebuild projects?		The extent to which demolition of existing structurally sound development is required or prevented.

¹² Includes a consideration of light pollution.

Topic	Objective	Decision-aiding questions: Does the Policy/ Plan/ Objective?	Weighting	Comments / Limitations
	resource consumption	...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding?		Responsible sourcing/low impact materials to be encouraged through policy. Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.
Services and facilities	16.Improve access to and range of key services and facilities	...support the contribution to the local economy from tourism?	LOW Tourism contributes a relatively small amount to local economy	The extent to which tourism is supported or discouraged by policy.
		...support superfast broadband connectivity in final 5% of the borough?	LOW Most locations now have reasonable speeds	Consideration of availability and speeds of broadband at appropriate local postcode.
		...improve range of services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of availability of the 9 key services i.e. post office, convenience store, public house, doctor's surgery, primary school, secondary school, frequent bus service (hourly Mon-Sat), train station and supermarket. Scores applied as follows: 9 services: + 6-8 services only: - 5 service or less: - - 5 services or less and loss of existing: - - - More positive scores reflect provision of additional services.
		...retail and leisure growth?		Leisure interpreted as including sports, cinema and restaurants. Scores reflect provision or removal of retail and leisure.
		...improve access to services and facilities especially in rural settlements?	HIGH A critical issue when determining where to develop. More weight if a rural settlement.	Consideration of desirable walking distances and accessibility by various modes of transport. Where services can only be reached via private car, a - - - score is applied.
Travel	17.Improve travel choice and reduce the need to travel by private vehicle	...support priority transport projects?		Project identified in the borough's transport and cycling strategies.
		...prioritise easy access to train stations within and outside the borough?		3-5 miles or limited public transport: - 5-10 miles or very limited public transport: - - >10 miles or no public transport Positive scores reflect accessibility by various modes of transport for stations within 3 miles. Where a train station can be accessed conveniently and safely on foot a + + + score is applied.
		...improve rural bus services and retain viability of urban bus services?	LOW Bus users are generally low in borough	Consideration of whether a bus service would be improved or worsened by policy.
		...support opportunities for active travel including cycling and walking?		Same scoring method as for air quality.
Waste	18.Reduce waste	...support continued decline in household waste reduction?		Proposed site allocation unlikely to make a significant difference to this objective.

Topic	Objective	Decision-aiding questions: Does the Policy/ Plan/ Objective?	Weighting	Comments / Limitations
Water	generation and disposal	...improve rates of household waste diverted from landfill?		Outside the scope of proposed site allocations.
		...reduce construction waste?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.
	19. Manage flood risk and conserve, protect and enhance water resources	...reduce water consumption rates?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.
		...manage impacts from flooding?		Improvements resulted in a positive score, maintaining the status quo or worsening impacts resulted in a negative score.
		...exacerbate flood risk on or off site?	HIGH Legislatively driven.	Consideration of flood zones and areas of flooding identified by the SFRA. Development in flood zone 1 was scored as + + + where the site did not feature on the 1 in 30 or 1 in 200 exceedance maps in the SFRA.
		...support improvements in groundwater quality?		Consideration of groundwater sources protection zones and risk of their contamination.
		...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities?	HIGH Water stress in the region is severe	The following guide was implemented for residential dwellings: <50 dwellings: 0 50 - 150 dwellings: - 150 - 500 dwellings: - - >500 dwellings: - - -

Appendix B - Mitigation Measures and Recommendations

Mitigation measures proposed by the SA for the Draft Local Plan varied depending on the aspect being considered. For site allocations, specific mitigation measures such as the requirement for landscape buffers were recommended. Other parts of the plan were more nuanced and involved a slight change in policy wording or emphasis to better meet the goals of sustainable development.

The following list provides a summary of the recommendations that were made during the process of drafting the Local Plan in order to mitigate adverse effects and enhance positive effects. The Draft Local Plan for Reg 18 has taken all these recommendations into account and made changes wherever possible.

Strategic Objectives

- Reference to climate change should be made.

Strategic Objectives including the Spatial Development Strategy

- The Local Plan should be guided by the availability of infrastructure e.g. regarding education and green infrastructure.
- In rural areas, growth should be accompanied by improvements to services, facilities and transport.
- An approach for growth combining elements of multiple strategies would be beneficial in helping to minimise negative impacts.
- Position a garden settlement in a location that:
 - o is well outside the AONB;
 - o can achieve Accessible Natural Greenspace Standard;
 - o benefits a pocket of deprivation;
 - o draws traffic away from the AQMA;
 - o eliminates impacts from flooding; and,
 - o provides employment opportunities for key wards

Potential Development Sites

Numerous site specific recommendations were made. Examples are included below:

- Incorporate landscape and open space buffers to sites with sensitive landscape features
- Incorporate management expectations for well-related sites of biodiversity value
- Include wording that offers protection for trees and non-ancient woodland
- Policy wording should include appropriate reference to flood zones and associated mitigation
- Strengthen wording on transport mitigation and promotion of active/sustainable travel especially in Royal Tunbridge Wells

- Add reference to community heating schemes in Royal Tunbridge Wells
- Provide greater detail about retail, leisure and energy expectations in Capel garden settlement policy
- Add expectation for improvements to Accessible Natural Greenspace Standards to the expectations for both the Capel Garden settlement and the Paddock Wood extension
- Make reference to car share facilities, Electric Vehicle infrastructure and climate change mitigation such as reduced fuel use in new dwellings
- Strengthen wording relating to protecting heritage features from 'have consideration to' to 'protect and enhance'
- Seek contributions to bus services and make reference to demand responsive bus services wherever feasible
- Replace word 'explore' in relation to employment provision with 'provide'
- Strengthen wording regarding ecological mitigation
- Provide for safer pedestrian access routes
- Seek contributions for improved allotment provision
- Make reference to SSSI Impact Risk Zones and Biodiversity Opportunity Areas
- Make reference to Groundwater Source Protection Zones
- Include wording to avoid demolition wherever possible
- Include a requirement for new secondary schools to be non selective and mixed gender
- Provide noise barriers
- Protect soils with the highest value for agriculture
- Retain hedgerows

Development Management Policies

- Implement new Development Management policy that cover the following topics:
 - o Preventing loss of economic floor space in preference for housing
 - o Resource conservation and waste management
 - o Water conservation and implementation of the government's higher options technical standard for water
 - o Fuel poverty
- Improve policy wording for elderly care (C2)

Appendix C - Cumulative Impact Assessment Methodology

For each settlement, a table was produced summarising the individual matrices for the sites proposed to be taken forward for allocation. The table shows how each proposed site allocation for that settlement impacts on each sustainability objective. Reading down the columns it is possible to see how many of the site allocations impact on each objective and whether that impact is beneficial or adverse, and minor or significant. At the bottom of each table, a row has been inserted showing the likely cumulative effect of the individual sites against each sustainability objective. The cumulative score has been determined as follows:

- where a high number of the sites generate a beneficial impact against the sustainability appraisal, the cumulative impact is likely to be a significant beneficial effect
- where a high number of sites generate an adverse impact against the sustainability appraisal, the cumulative impact is likely to be a significant adverse effect
- where a high number of sites generate an uncertain impact against the sustainability appraisal, the cumulative impact is likely to be uncertain
- where a high number of sites generate no significant impact or where the beneficial and adverse impacts are likely to cancel each other out, the cumulative impact is likely to be no significant impact

Where effects can be summed such as in the case for pressure on the climate, education or water resources, a more highly negative or positive score is applied than the average across the sites.

Where the impacts are more mixed, including both beneficial and adverse impacts, a judgement is made as to whether the cumulative impact is likely to be minor beneficial, minor adverse, not significant or uncertain.

Appendix D - Cumulative Impact Assessment for Green Belt sites

Table 77. SA scores for allocated sites in the Green Belt.
Includes cumulative impact assessment to inform STR 4 Green Belt.

Sustainability Objective	Score																					
	AL/SO 3	AL/SO 4	AL/SP 1	AL/SP 2	AL/SP 3	AL/PE 1	AL/PE 2	AL/PE 3	AL/PE 4	AL/PE 6	AL/PE 7	AL/RU 1	AL/RTW 12	AL/RTW 13	AL/RTW 14	AL/RTW 16	AL/RTW 18	AL/RTW 23	AL/RTW 32	AL/PW 1	AL/CA 1	STR 4
Air	-	0/-	0/-	0	0	0	0	0	0/-	-	0	0	0	0/-	0	?	-	0	0/-	?	?	?
Biodiversity	0/-	0/+	0	0	0	0	0	0	0	-	0	-/-	0/-	0/-	0	0/-	0/-	0	0	0/+	0/-	0
Business Growth	++/+++	+	0	0	0	0	0	0	+	+/++	0/+	0	0/+	0/+	0/+	+/?	0	0	0	+/+++	+	++
Climate Change	0/-	?/-	0	0	0	?/-	?/-	?/-	?/-	?/-	0	?/-	0/-	0/-	0/-	0/-	-	0	0	-/-	-	--
Deprivation	0	0	0	0	0	0	0	0	0	0/+	0	0	0	0	0	0/+	0	0	0	+/+++	+	++
Education	+	0	0/-	+++	0	+	+	+	+	+	0	+++	0	0	0	+	++/+++	0	0/?	+/+++	+/+++	+++
Employment	++	++	+	0	+	+	+	+	++	++	+	++	+++	+++	+++	+	++	+	+	++	++	+++
Equality	-	0	-	0	0	+	+	+	0/+	+	0	+	0	0	0/+	+/+++	++	+	+	++	++/+++	++
Health	+	++	0	0	0/+	0	0	0	0/+	+	0	0	0	0	0	0/+	0/+	+	0/+	+/+++	+/+++	++
Heritage	++	++	0	0	0	-	-	0/-	-	-	0	-	0	-	0	0	--	0	0	-	-	-/-
Housing	+/+++	0	+	0	0	+/+++	+/+++	+/+++	0/+	+	0	+	0	0	0	?	++/+++	0	+	+++	+++	+++
Land use	0/+	0/-	-/-	0	0	-/-	-/-	-/-	-/-	-/-	-	--	-/-	-/-	0	0/-	--	0	-	--/---	--/---	---
Landscape	++	0/-	0/-	0	0	-	-	-/-	-	--	0	-/-	-	-	0/-	0/-	--	0	0/-	-	--	--/---
Noise	-	0/-	-	0	0	-	-	-	0/-	-	0	-/-	0/-	0/-	0/-	-/?	-/-	0/-	0/-	-/-	-/-	--
Resources	?	?	0/?	0	0	-/?	-/?	0/?	0/?	?	?	?	0/?	+++/?	0/?	?	0/?	0	0/?	0/+	0/+	0/+
Services & Facilities	0/-	0/+	--	0	0/+	0/-	0/-	0/-	0/-	0/-	0	+	0	0	+	++	++	+++	++	++	+++	?
Travel	+	+	0/-	0	0	0	0	0	-	0/-	0	0	0/+	0/+	0/+	+	+/+++	+	+	+	++	?
Waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Water	0/-	0	0/+	0	0	0	0/-	0/-	0/-	0/-	0	0	0	0	0/+	0/+	?	0	0/+	++/?	++/?	?
Commentary	See settlement tables in Appendices E, F, G, H, R and T for commentary on individual allocated sites. Green belt land is being released to allow for various types of development in the plan period. Scores are applied to reflect the impacts that the proposed Green Belt releases would have on each sustainability objective thus this is, in effect, a cumulative impact assessment of Green Belt release sites. The scale of Policy AL/PW 1 and AL/CA 1 in comparison to the other allocations, dominates this assessment of cumulative effects. Mix scores for air, services, transport and water to reflect wide variety of scores across the sites.																					

Appendix E - Royal Tunbridge Wells

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 1 of 12)			
	7	24	30	39
	Montacute Gardens, Royal Tunbridge Wells, TN4 8HG	Tunbridge Wells Garden Centre, Eridge Road, Tunbridge Wells TN4 8HP	Land at Caenwood Farm and Whitegates Farm, Reynolds Lane, Royal Tunbridge Wells (including sites 100, 199 and 205)	Land adjoining Dunorlan Park, Pembury Road, Tunbridge Wells TN2 3QN
Air	?	?	-- / ---	0 / +
Biodiversity	0	0 / -	-	0
Business Growth	0	+ / ?	0	0
Climate Change	0	0 / -	-	0
Deprivation	0	0 / +	0	0
Education	+	+	- / --	0 / +
Employment	+	+	+	+
Equality	+ / ++	+ / ++	?	+
Health	0 / +	0 / +	+	0 / +
Heritage	- / --	0	--	--
Housing	+	?	++ / +++	+
Land use	0 / -	0 / -	---	- / --
Landscape	0 / -	0 / -	-- / ---	-
Noise	-	- / ?	-- / ---	0 / -
Resources	?	?	? / -	0 / ?
Services & Facilities	++ / +++	++	+	++
Travel	+ / ++	+	?	+ / ++
Waste	0	0	0	0
Water	0	0 / +	0	0
Commentary	The majority of objectives for this site score as unknown, neutral or positive. The negative score given for heritage is informed by the location of the site in the Tunbridge Wells Conservation Area and the positive contribution the existing buildings and their setting is considered to make to the Conservation Area.	Flood zones 2 and 3 present on site are unlikely to prevent development and can be factored into scheme design.	This is a large site that would make a significant positive contribution to the housing objective. However, the substantial use of private vehicles in this location causes the noise and air objectives to score very negatively. The site also has sensitive biodiversity, heritage and landscape features.	This site scores mostly neutral scores with some positive ones. It is let down on its heritage score, influenced by the sites location in the Tunbridge Wells Conservation Area and being adjacent to Dunorlan Park, an Historic Park and Garden. Part of the site has archaeological potential which influences this score too. The site is a greenfield site and a small part of a larger Green Belt parcel the release of which would cause very high harm. The score for land use has been adjusted to reflect the size of the site. The negative landscape score is influenced by the impact the site has on the setting of the landscape whilst the negative score for noise has been informed by the sites position along the Pembury Road.

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 2 of 12)			
	53		57	72
	WHOLE SITE: Plot A: Land to the north of Hawkenbury Recreation Ground and Plot B: Land to the east and north of Hawkenbury allotments, Hawkenbury,	PART SITE; Plot A: Land to the north of Hawkenbury Recreation Ground and Plot B: Land to the east and north of Hawkenbury allotments, Hawkenbury,	Land adjacent to Longfield Road, Tunbridge Wells	Former North Farm landfill site, North Farm Lane, Tunbridge Wells TN2 3EE (including 261)
Air	0 / -	0	0	0
Biodiversity	0	0	0 / -	0
Business Growth	0	0	0 / +	0 / +
Climate Change	0 / -	0	0 / -	?
Deprivation	0	0	0	0
Education	0 / +	0	0	0
Employment	+	+	+++	+++
Equality	+	+	0	0 / +
Health	+	+	0	0
Heritage	-- / ---	0	0	0
Housing	++ / +++	0	0	0
Land use	--	0	- / --	0
Landscape	--	0	-	0 / -
Noise	0 / --	0 / -	0 / -	0 / -
Resources	0 / ?	0	0 / ?	0 / ?
Services & Facilities	+++	+++	0	+
Travel	+	+	0 / +	0 / +
Waste	0	0	0	0
Water	0	0	0	0 / +
Commentary	<p>This site on balance is highly sustainable, the parcel to the north being less so as it is more detached from the built up area than the southern parcel. Most scores are neutral and there are positive scores. The site scores negatively for heritage being a large site immediately adjacent to an Historic Park and Garden and having a negative impact on the setting of this and the landscape setting of Tunbridge Wells. A negative score for land use is influenced by the loss of a greenfield site, part of a broader Green Belt parcel that would cause very high harm if released from the Green Belt, the score adjusted to reflect fact that site is part of the bigger parcel. It also results in the loss of grade 3 agricultural soils. The site forms part of the landscape setting of Tunbridge Wells and would result in the loss of a greenfield site in the AONB (negative landscape score given).</p> <p>This site is highly sustainable. All objectives are neutral or positive except for noise which is slightly negative due to the potential for sports uses to create disturbance. When scoring the Landscape objective, it was assumed that the proposed uses would not conflict with the Dark Skies DM Policy. Health and services score better than most sites in the vicinity due to the proposal for sports use.</p> <p>The Employment objective scores very highly due to the creation of new jobs in a ward that has one of the highest levels of unemployment in the borough.</p> <p>Water objective is given an unknown score as, while it is likely that flood issues on site can be overcome, the specific proposed use is not detailed and thus consumption requirements are unclear. The Employment objective scores very highly due to the creation of new jobs in a ward that has one of the highest levels of unemployment in the borough. Climate change objective is scored as unknown as there is potential for a solar farm on the site but no guarantees are given.</p>			

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 3 of 12)			
	73	85	99	101
	Land at Pembury Road (south), Tunbridge Wells	Land at Goods Station Road, Tunbridge Wells	Land at Pembury Road, Tunbridge Wells TN2	Colebrooke House, Pembury Road, Capel TN11 0QD
Air	-	?	-	0 / -
Biodiversity	0	0	0	0 / -
Business Growth	0	-	0	0 / +
Climate Change	-	0	-	0 / -
Deprivation	0	0	0	0
Education	0 / +	0 / +	0 / +	0
Employment	+	+	+	+++
Equality		+/++		0
Health	0 / +	0 / +	0 / +	0
Heritage	-	0	-	-
Housing	+ / ++	+	+ / ++	0
Land use	- / --	+	-- / ---	- / --
Landscape	--	0	-- / ---	-
Noise	0 / -	0 / -	0 / -	0 / -
Resources	0 / ?	+++ / ?	0 / ?	+++ / ?
Services & Facilities	++	++ / +++	++	0
Travel	+	+	+	0 / +
Waste	0	0	0	0
Water	0	0	0	0
Commentary	<p>This site scores a number of neutral scores with some positive ones. Negative scores are given for air, heritage, land use and landscape and noise. The site is a greenfield site in the AONB, part of a larger Green Belt parcel of land that would cause very high harm if released from the Green Belt. The land use score has been adjusted to reflect site is a smaller part of the larger parcel. The location of the site along Pembury Road relative to distance to key services and facilities and ease of use by pedestrians is likely to encourage car use. This has informed the air score given. Noise score reflects location along the busy Pembury Road.</p>	<p>Mostly sustainable site. Air quality score is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. Loss of business space in favour for residential housing causes the business objective to be scored negatively. A conversion of the existing warehouse enables the resources objective to score positively.</p>	<p>This site scores a number of neutral scores with some positive ones. Negative scores are given for air, climate change, heritage, land use, landscape and noise. The site is a greenfield site in the AONB, part of a Green Belt parcel of land that would cause high harm if released from the Green Belt. The location of the site along Pembury Road relative to distance to key services and facilities is likely to encourage car use. This has informed the air score and climate change score given. Noise score reflects location along the busy Pembury Road. The site forms part of the landscape setting of the main urban area of Tunbridge Wells and helps prevent coalescence between Tunbridge Wells and Pembury, the frontage is within the Conservation Area. This has influenced the heritage and landscape scores given.</p>	<p>The Employment objective scores very highly due to the creation of new jobs in a ward that has one of the highest levels of unemployment in the borough. Air Quality scores slightly negatively compared to the adjacent site (Policy RTW 12) because of the direct vehicular access with the A21 making extensions to bus routes serving the retail park more cumbersome, and encouraging private car use.</p>

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 4 of 12)			
	114	116	134	137
	Land at Sandown Park, west of A21, Royal Tunbridge Wells TN2 4RT	Land south of Pembury Road, Tunbridge Wells	Land around Sandstone House, Longdrift, Court Lodge & Shallowdene, Broadwater Down, TN2 5PE	PART SITE: Land to the west of Eridge Road at Spratsbrook Farm, Royal Tunbridge Wells TN3
Air	-	0 / +	?	-
Biodiversity	0	-	0	0 / -
Business Growth	0 / +	0	0	0
Climate Change	0 / -	0 / -	0	-
Deprivation	0	0	0	0
Education	0 / +	0 / +	+	++ / +++
Employment	+ / ++	+	+	++
Equality		0 / +	+	++
Health	0 / +	0 / +	0 / +	0 / +
Heritage	0	0 / -	0 / -	--
Housing	+	+	+	++ / +++
Land use	-- / ---	--	0 / -	--
Landscape	0 / -	-- / ---	0 / -	--
Noise	0 / -	0 / -	-	- / --
Resources	0 / ?	0 / ?	? / -	0 / ?
Services & Facilities	++	++	++	++
Travel	0	+	+ / ++	+ / ++
Waste	0	0	0	0
Water	0	0	0	?
Commentary	<p>This site scores a number of neutral scores with some positive ones. Negative scores are given for air, land use and noise. Land Use score is informed by the loss of a greenfield site which is part of a Green Belt parcel the release of which would cause high harm. Air and noise scores are influenced by the location of the site adjacent to the A21 and close to the Pembury Road.</p>	<p>Site scores neutral scores and some positives. Negative scores have been given for land use, landscape and biodiversity. The site is a greenfield site in the AONB, a woodland parcel, the loss of which would be detrimental to the AONB, reflected in the negative landscape score given along with impact on the setting of Tunbridge Wells. Land use is influenced by the site being the Green Belt, part of a parcel that would cause very high harm if released. The negative biodiversity score is influenced by the wooded nature of the site.</p>	<p>This site scores mostly neutral scores with several positive ones. It scores a slight negative for noise, a reflection of the location of the site near the A26 Eridge Road. The heritage and landscape scores are informed by the possibility that development of the site will impact upon the setting of the Conservation Area and affect townscape quality.</p>	<p>The scores for this site are mixed. Despite likely contributions to improved active travel and sustainable transport options, air quality is scored as negative overall because of the large size of the development and likelihood that new vehicles will utilise the A26 as a through route. The Water objective is scored as mixed overall to reflect the conflict between the site being in flood zone 1 but also increasing demand on existing water supplies. Negative score for noise because the site is near to the main Gatwick flight path and is likely to result in a large increase of vehicle movements onto a road that already experiences high levels of road noise. This site scores positively for the education, employment and equality objectives because of the provision of a new secondary school in an area of high demand which will provide new jobs and is likely to be non selective, mixed gender school in an area where selective and single gender schools are common. The latter benefit is not guaranteed by policy though. The negative land use and landscape scores reflect the loss of greenfield land which is also Green Belt. Finally heritage score negatively due to the compromised setting of the Hill Fort (a Scheduled Ancient Monument) and complete loss of assart field.</p>

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 5 of 12)			
	140	145	165	175
	Knights Park, Tunbridge Wells, TN2 3UW (including 138 and 139)	WA Turner Factory Site, Broadwater Lane, Tunbridge Wells TN2 5RD	Pantiles Car Park, Major Yorks Road, Tunbridge Wells TN2 5TP	Court Lodge & Land to rear of Sandstone House, 44 Broadwater Down, Tunbridge Wells TN2 5PE
Air	0 / +	?	?	?
Biodiversity	0	0	-	0
Business Growth	0 / +	-	0	0
Climate Change	0 / -	0	0	0
Deprivation	0	0 / +	0	0
Education	0	+	+	+
Employment	+++	?	+	+
Equality	0	+ / ++	+ / ++	+
Health	0	0 / +	0 / +	0 / +
Heritage	0	0	--	0 / -
Housing	0	+	+	+
Land use	0 / +	+	-	0 / -
Landscape	0	0 / +	- / --	0 / -
Noise	0 / -	-	-	-
Resources	0 / ?	?	0 / ?	? / -
Services & Facilities	+	++ / +++	++ / +++	++
Travel	0 / +	+ / ++	+ / ++	+ / ++
Waste	0	0	0	0
Water	0	0	0	0
Commentary	The Employment objective scores very highly due to the creation of new jobs in a ward that has one of the highest levels of unemployment in the borough. A slight positive score for Air reflects the probability that intensification of leisure use will involve loss of some parking spaces thus forcing users to consider the alternative modes of transport that already exist and would be further improved by this allocation.	This is a reasonable site with potential noise and air issues being the only slight detractors along with Business Growth. Noise and air scores are informed by the location of the site near the A26 and the Business Growth score is influenced by uncertainty over existing jobs on the site and the risk to these.	This site scores a number of both neutral and positive scores. It scores negative on biodiversity, heritage, land use and landscape as well as noise. The biodiversity score is influenced by the sites position, surrounded by the Tunbridge Wells and Rusthall Common a designated Local Wildlife Site. The land use score is influenced by the sites location in the Green Belt, being part of a larger parcel the release of which would cause very high harm. The landscape score is reflective of the contribution the site along with the wider Common makes to the setting of Tunbridge Wells and concern about effect on townscape arising from development of the site. The negative noise score is influenced by the sites location relative to the A26.	This site scores mostly neutral scores with several positive ones. It scores a slight negative for noise, a reflection of the location of the site near the A26 Eridge Road. The heritage and landscape scores are informed by the possibility that development of the site will impact upon the setting of the Conservation Area and affect townscape quality.

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 6 of 12)				
	176	198	226	235	236
	Former Plant and Tool Hire site on Eridge Road, Tunbridge Wells TN4 8HJ	Tunbridge Wells Telephone Engineering Centre, Broadwater Lane, Tunbridge Wells TN2 5RE	St Mark's Recreation Ground, Frant Road, Tunbridge Wells, TN2 5LS	Land at Culverden Stadium, Culverden Down, Royal Tunbridge Wells, TN4 9SG	Land at Bayham Sports Field West, Bayham Road, Tunbridge Wells
Air	?	?	0 +	?	0
Biodiversity	0	0	0	0	0
Business Growth	?	0	0	0	0
Climate Change	0	0	0	0 / -	0
Deprivation	0 / +	0 / +	0	0	0
Education	+	+	0 / +	0 / +	0 / +
Employment	?	+	+	+	+
Equality	+ / ++	+ / ++	0	+	0
Health	0 / +	0 / +	0 / +	0 / +	0 / +
Heritage	0	0	0	0	0
Housing	+	+	0 / +	+	0 / +
Land use	+	+		- / - -	-
Landscape	0 / ?	0	-	0	0
Noise	-	-	0 / -	0 / -	0
Resources	0 / ?	? / - - -	0 / ?	? / - - -	0
Services & Facilities	++ / +++	++ / +++	++	++	++
Travel	+ / ++	+ / ++	+	+	0
Waste	0	0	0	0	0
Water	0	0	0	0 / +	0
Commentary	The majority of objectives for this site score as unknown, neutral or positive. However, unknown scores for the Business and Employment objectives relate to the uncertainty about the proposed development type and it is not possible for these to turn negative when these details are confirmed. For this reason, it is expected that the site will pass the exception test for development in flood zone 3. This is reflected in the neutral score for the water objective.	This is a reasonable site with potential noise and air issues being the only slight detractors. Climate Change and Water objectives also score slightly negative because of increased carbon emissions from new dwellings and increased pressure on water resources.	This site has been given mostly neutral scores with some positive ones. The proximity to main urban area of Tunbridge Wells means that the Services objectives scores well. Negative scores have been given for landscape and land use, influenced by the greenfield nature of the site and the likely impact on the townscape/settlement edge through the release of this site. It is an historic field.	A largely sustainable site with loss of greenfield land being the only significant detractor.	This site has been given mostly neutral scores. The proximity to main urban area of Tunbridge Wells means that the Services objectives scores well. Lack of pedestrian access along Bayham Road means the housing, transport and equality objectives can not score as highly as other sites in the urban area. The presence of Groundwater Source Protection Zone on the site was considered and felt to have a low risk of contamination.

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 7 of 12)				
	237	238	249	250	255
	Land at Cadagan Sports Field, St John's Road, Tunbridge Wells	Land at Colebrook Sports Field, Liptraps Lane, Tunbridge Wells	Cemetery Depot, Benhall Mill Road, Tunbridge wells	Land at Royal Victoria Place, Tunbridge Wells (including site 251)	Land at Hawkenbury , off Hawkenbury Road/Maryland Road, Royal Tunbridge Wells
Air	?	0 / +	0	?	?
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	+	0
Climate Change	0	0 / -	0	0 / -	-
Deprivation	0	0	0	0 / +	0
Education	+	+	0 / +	0	+ / ++
Employment	+	+	+	+++	+
Equality	+	0 / +	+	+ / ++	+
Health	0	0	0 / +	0	0 / +
Heritage	0	0	?	0	-
Housing	+	+ / ++	+	0	++ / +++
Land use	-	-	0	+	- / --
Landscape	0 / -	0 / -	0	0	-
Noise	-	0 / -	0	0 / -	0 / -
Resources	- / ?	- / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	+	+	++	0 / +	++
Travel	+ / ++	+ / ++	+	+	+
Waste	0	0	0	0	0
Water	0	0	0	0	0 / -
Commentary	Air quality is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. The removal of existing sports facilities causes the health objective to score poorer than other sites in the area as local residents will lose out.	Education objective scores positive as local schools have adequate capacity. Score for the health, services and equality objectives are not as high as they could be due to the loss of sports facilities and accessible open space for the residents of Sherwood, which is an area with relatively high income deprivation. Flood zones 2 and 3 present on site are unlikely to prevent development and can be factored into scheme design.	This site has been given mostly neutral scores. The proximity to main urban area of Tunbridge Wells means that the Services objectives scores well. The heritage objective is scored as unknown due to the specialist advice that would be required.	A largely sustainable site. Air quality score is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA.	This site has a mix of scores. This is mostly because the relatively large scale of development causes potential impacts to be more extreme.

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 8 of 12)				
	260		262	264	267
	WHOLE SITE: Auction House and public car park, Linden Park Road, , TN2 5QL	PART SITE; Auction House and public car park, Linden Park Road, TN2 5QL	Mount Pleasant car park and surgery, Mount Pleasant Avenue, Tunbridge Wells (including 263)	Town Hall/Town Centre site, Royal Tunbridge Wells	Rowan Tree Road, Showfields, Tunbridge Wells
Air	?	?	?	?	0
Biodiversity	0	0	-	0	0
Business Growth	0 / +	0 / +	0 / +	0 / +	0
Climate Change	0	0	0 / -	0	0
Deprivation	0	0	0 / +	0 / +	0 / +
Education	+	0	0	0	0
Employment	+ / ++	++	+++	++	++
Equality	+ / ++	+ / ++	+ / ++	+ / ++	+ / ++
Health	+	0	0 / +	0	0
Heritage	?	0	--	-	0
Housing	+	0	0	0	0
Land use	+	+	0 / -	+	+
Landscape	0 / +	0	0 / -	0 / ?	0
Noise	-	0	0 / -	0 / -	0
Resources	? / -	0	? / - - -	?	0 / ?
Services & Facilities	++ / +++	0	+	++ / +++	+++
Travel	+ / ++	+	+	+	+
Waste	0	0	0	0	0
Water	0	0	0	0 / +	0
Commentary	Highly sustainable site which utilises an existing previously developed site.	Highly sustainable site which secures a change of use of existing business premise and reuse of existing building.	This site has a mixed range of scores. Air quality score is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. Loss of greenspace with connectivity to a SLNCV has caused the biodiversity objective to be scored negatively. Likewise the land use objective is scored slightly negatively due to the loss of greenfield land. Positive score for services reflects the benefits the proposals would bring to tourism and leisure. Health scores slightly positively due to the wellbeing benefits of providing a more inviting entrance to Calvary Grounds (a Historic Park and Garden) and attracting more visitors. Conversely, the loss of some of the existing heritage asset, causes the heritage objective to score negatively. The Landscape/Townscape objective scores as slightly negative due to the loss of green open space in Calvary Grounds and alteration to the park setting.	Highly sustainable site. Air quality score is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. This location is not suited to residential housing. Adjacent sites are meeting local demand and scores have been applied on this basis. The Landscape/Townscape objective scores as partially unknown due to the difficulty of assessing impacts without a design.	This is a highly sustainable site with positive scores reflecting the improvement to services and suitable location. The climate change score reflects the fact that proposals are for redevelopment of existing facilities rather than creation of new facilities. Private car use is not essential in this location.

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 9 of 12)				
	268	328	359	400	411
	Vale Avenue and Torrington Car Park, Tunbridge Wells (including 200)	Land at Eridge Road & Eastlands Close, Royal Tunbridge Wells	Land to the east of Halliwell Nursing Home, Kingswood Road, Tunbridge Wells	Land to the east of Halliwell Nursing Home, Kingswood Road, Tunbridge Wells	Land at Sandown Park between Pembury Grange and A21, Royal Tunbridge Wells
Air	?	?	0 / +	0 / +	-
Biodiversity	0 / -	0	0	0	0
Business Growth	+	0	0	0	0
Climate Change	0 / -	0	0	0 / -	0 / -
Deprivation	0 / +	0	0	0	0
Education	0 / +	+	0 / +	0 / +	0 / +
Employment	+++	+	+	+	+
Equality	+ / ++	+	+	+	+
Health	0 / +	0 / +	0 / +	0 / +	0 / +
Heritage	0 / -	0	-	- / --	0 / -
Housing	++	+	+	+ / ++	+ / ++
Land use	+		- / --	- / --	-- / ---
Landscape	0 / ?	-	0	-	--
Noise	-	-	0 / ?	0 / ?	0 / -
Resources	?	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	+++	++	++ / +++	++ / +++	++
Travel	+ / ++	+ / ++	+ / ++	+ / ++	0
Waste	0	0	0	0	0
Water	0	0	0	0	0
Commentary	Air quality is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. There is an existing high demand for school places locally and thus the education objective score negatively. Travel and Services objectives score particularly well because the central location means new residents have access to a wide range of services and would not necessarily require a private car. The Landscape/Townscape objective scores as partially unknown due to the difficulty of assessing impacts without a design.	This is a site that scores several neutrals and some positive scores. Negative scores have been given for noise due to the sites location along the A26. The site also receives a negative score for landscape due to the loss of the green open space and the contribution this makes to the approach into Tunbridge Wells and the townscape. The loss of the green space has informed the land use score given.	This site scores mostly neutral scores with some positive ones. It scores negatively on heritage due to it being adjacent to an historic park and garden and adjacent to an area of archaeological potential. The site is a greenfield site and a small part of a larger Green Belt parcel the release of which would cause very high harm. The score for land use has been adjusted to reflect the size of the site. The negative score for noise has been informed by the sites position in close proximity to the Pembury Road.	This site scores mostly neutral scores with some positive ones. It scores negatively on heritage due to it being adjacent to the Conservation Area, forming part of its setting and adjacent to an historic park and garden and area of archaeological potential. The site is a greenfield site and part of a larger Green Belt parcel the release of which would cause very high harm. The score for land use has been adjusted to reflect the size of the site. The negative score for noise has been informed by the sites position in close proximity to the Pembury Road.	This site scores a number of neutral scores with some positive ones. Negative scores are given for air, land use, landscape and noise. Land use score is informed by the loss of a greenfield site which is part of a Green Belt parcel the release of which would cause high harm. Air and noise scores are influenced by the location of the site adjacent to the A21 and close to the Pembury Road. The landscape negative score is influenced by the loss of a greenfield site which contributes to the landscape setting of Tunbridge Wells.

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 10 of 12)			
	434	EA_132	EA_1012	EA_83
	Tutty's Farm, Hawkenbury, Royal Tunbridge Wells	Former cinema site, Mount Pleasant Road	Library and Adult Education Centre	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road
Air	?	?	?	?
Biodiversity	0 / -	0	0	0
Business Growth	0	0 / +	0 / +	-
Climate Change	0 / -	0 / -	0	0 / -
Deprivation	0	+	0 / +	0 / +
Education		0 / +	+	0
Employment	+	+++	++	+
Equality	+	+ / ++	+ / ++	+ / ++
Health	0 / +	0 / +	0	0 / +
Heritage	-	-	-	-
Housing	++	++	0	++
Land use	-- / ---	+	+	+
Landscape	--	0 / +	0 / ?	0 / ?
Noise	0	-	0 / -	-
Resources	? / -	0 / ?	?	+ / ?
Services & Facilities	+ / ++	+++	+	++ / +++
Travel	0 / +	+ / ++	+	+ / ++
Waste	0	0	0	0
Water	0	0	0 / +	0
Commentary	<p>This sites scores a mix of scores, with several neutral scores and some positives. Negative scores are given for heritage, land use and landscape. The heritage score is informed by likely impact on the settlement edge and landscape setting of Tunbridge Wells. The site is a Green Belt parcel that if released from the Green Belt would cause high harm, it a greenfield site that has agricultural land classification 3. This has informed the land use score given whilst the loss of the greenfield site and its likely effect on the settlement edge has informed the landscape score given.</p>	<p>A mostly sustainable site. Air quality score is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. The proposal for the site would represent a form of regeneration in an area of medium income deprivation and thus scores slightly positively for deprivation. There is an existing high demand for school places locally and thus the education objective score negatively. Travel and Services objectives score particularly well because the central location means new residents have access to a wide range of services and would not necessarily require a private car. The Landscape/Townscape objective scores as partially positive due to the improvement in the townscape likely to occur as a result of development in an area1thought of as an eye sore.</p>	<p>Highly sustainable site. Air quality score is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. The provision of a new improved museum and library benefits the education objective. The Landscape/Townscape objective scores as partially unknown due to the difficulty of assessing impacts without a design.</p>	<p>Air quality is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. Loss of business space in favour for residential housing causes the business objective to be scored negatively. Preventing some demolition enables the resources objective to score positively. The Landscape/Townscape objective scores as partially unknown due to the difficulty of assessing impacts without a design.</p>

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 11 of 12)			
	EA_72	EA_101	MR_1	EA_263
	Land at 36-46 St John's Road	Land at 77 Mount Ephraim (Sturge House, Brockborne House)	Land at Medway Road	Land at 123-129 Silverdale Road
Air	?	?	0	0
Biodiversity	0	0	0	0
Business Growth	-	+	-	0
Climate Change	0	0	0	0
Deprivation	0 / +	0	0	0 / +
Education	0 / ?	0	0 / +	+
Employment	+	+++	+	+
Equality	+ / ++	+ / ++	+ / ++	+
Health	0 / +	0 / +	+	+
Heritage	0	0	0	0
Housing	++ / ?	0	+	+
Land use	+	+	+	0
Landscape	0 / ?	0 / ?	0	0
Noise	-	-	0 / -	0 / -
Resources	--- / ?	?	? / ---	-- / ?
Services & Facilities	++ / +++	++ / +++	++ / +++	++
Travel	+ / ++	+	+	+ / ++
Waste	0	0	0	0
Water	0	0	0	0
Commentary	<p>Air quality is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. Loss of business space in favour of residential housing causes the business objective to be scored negatively. The requirement for demolition means the Resources objective to score negatively. The Landscape/Townscape objective scores as partially unknown due to the difficulty of assessing impacts without a design. Likewise, housing and Education objectives are partially unknown because it is not known if the housing would be specifically for older persons or not.</p>	<p>Air quality is scored as mixed overall because the site is easily accessed by sustainable and active transport modes but is still likely to increase traffic in the AQMA. Likewise, noise levels on the A26 which is already a sensitive location. Travel and Services objectives score particularly well because the central location means employees do not necessarily require a private car.</p>	<p>A reasonable site. Loss of potential business space in favour of residential housing causes the Business objective to be negative. However, the wide range and accessibility of services in this town centre location suits this location for residential housing.</p>	<p>Development here would represent a form of regeneration and thus the Deprivation objective scores slightly positively. Remaining objectives are largely neutral or positive reflecting the central location and access to services with no significant wildlife or landscape issues.</p>

Sustainability Objective	Scores for Reasonable Sites in Royal Tunbridge Wells (part 12 of 12)		
	EA_194	EA_335	EA_195
	Land at former Gas Works, Sandhurst Road	Land at Beechwood Sacred Heart School	Land at 1 Meadow Road and 8 Upper Grosvenor Road
Air	0 / +	0 / -	-
Biodiversity	0 / -	0	0
Business Growth	0	0	+
Climate Change	-	0 / -	0
Deprivation	+	0	0
Education	0 / +	0	+
Employment	+	+	+
Equality	+	+	+ / ++
Health	+	++	0
Heritage	0	0	0
Housing	++	+	0
Land use	+	-	+
Landscape	0	0 / -	0
Noise	-	0 / -	0 / -
Resources	0 / ?	0 / ?	++ / ?
Services & Facilities	++	++	0
Travel	++ / +++	+	+
Waste	0	0	0
Water	?	0	0
Commentary	<p>This site scores largely neutral or positive. The scale of development influences many scores. Air score reflects relatively large contributions for improving active travel links and location of site near mainline train station meaning private car use is not essential. Proximity and connectivity to Hilbert Woods LNR cause the biodiversity objective to score slightly negatively. The Water objective is scored as mixed overall to reflect the conflict between the site improving flooding for new and existing residents but also increasing demand on existing water supplies with a large number of new dwellings. Deprivation scores positively due to the regeneration in an Area of Income Deprivation.</p>	<p>The location of this site on the Pembury Road causes a few objectives to score slightly negatively. For example, air is slightly negative due to the potential for bringing sensitive receptors in contact with high levels of pollutants. However, the health objective scores positively due to proposal that this site meets needs for residential care in the borough.</p>	<p>Highly sustainable site. Air quality score is scored as negative overall as the position of the site would bring young people into contact with poor air quality. The education objective scores positively due to the nature of the proposed site use. Preventing some demolition enables the resources objective to score positively.</p>

Appendix F - Southborough

Sustainability Objective	Scores for Reasonable Sites in Southborough (part 1 of 2)				
	8	10	45	90	232
	Wheeler's Field, Powder Mill Lane, Southborough	The Piggery, Powder Mill Lane, Southborough	Land adjoining Birchwood Avenue/Dower House Crescent	Mabledon, London Road, Southborough, TN4 0UH	Land at Bright Ridge, and Speldhurst Road (former allotments)
Air	0	0	0 / -	0 / -	?
Biodiversity	0	0 / -	-	0 / +	0
Business Growth	0	0	0	+	0
Climate Change	0	0	0	? / -	0
Deprivation	0	0	0	0	0
Education	+	+	+	0	+
Employment	+	+	+	++	+
Equality	0	0	0	0	0
Health	+	+	+	++	+
Heritage	0 / -	0	0	++	0
Housing	0 / +	0 / +	+	0	+
Land use	-	- / - -	- -	0 / -	-
Landscape	0 / -	- / - -	- -	0 / -	0 / -
Noise	0 / -	0 / -	0 / -	0 / -	0 / -
Resources	0 / ?	0 / ?	0 / ?	?	0 / ?
Services & Facilities	+	+	0 / -	0 / +	+
Travel	+	+	+	+	+ / ++
Waste	0	0	0	0	0
Water	0	0	0	0	0 / +
Commentary	This is a reasonably located site which scores several neutrals and positives, a reflection of its location on the edge of the settlement/main urban area and the services and facilities including transport available. It is let down on its heritage score due to a significant portion of the site having archaeological potential.	This is a reasonably located site which scores neutrals and positives, a reflection of its location close to the edge of the settlement/main urban area and the services and facilities including transport available. It is let down on its land use score due to it being Green Belt land, part of a parcel that has very high harm if released. It scores negatively on landscape as part of the site is a wildflower meadow and for biodiversity as the site is adjacent to a Local Nature Reserve.	This site includes a mix of scores. It scores positively in terms of housing provision and transport but is let down by its land use score informed by its Green Belt location the release of which would cause moderate harm to the Green Belt and landscape score being a loss of a greenfield site in the AONB in an historic landscape. It is let down by a lack of key services and facilities within a desirable walking distance from the site. It is an assart field which lowers the heritage score of the site and the biodiversity score is informed by its location adjacent to Ancient Woodland, a Local Wildlife Site and a Wildflower Meadow.	The benefit to wellbeing of opening up a heritage asset to the public ensures the health objective scores highly. Carbon scores negatively for this site as the hotel and leisure facilities will have high energy demands and are likely to be visited by private car only. However, the provision of new leisure facilities allows the services and health objectives to score positively.	The site is entirely within flood zone 1 and would not put great pressure on existing water supplier so the water objective scores slightly positively. Noise scores negative due to the location of the edge of the main Gatwick flight path. Air quality score is scored as mixed overall because the site is located so that a wide range of services can be reached without private car but it is still likely to increase traffic in the AQMA.

Sustainability Objective	Scores for Reasonable Sites in Southborough (part 2 of 2)					
	233	327	335	441	445	234
	Land to the rear of Hornbeam Avenue and Walnut Way	Land at Blackthorn Avenue, Royal Tunbridge Wells	Land to the north of Speldhurst Road & west of Bright Ridge	Southfields Park, St John's Rd	Mabledon & Nightingale east of A26 & south of the A21	Southborough Hub, London Road, TN4 0ND
Air	0	0	-	-	-	?
Biodiversity	--	0	0	0	0 / -	0
Business Growth	0	0	0	0	++ / +++	++
Climate Change	0	0	0	0 / --	0 / -	0
Deprivation	0	0	0	0	0	+
Education	+	+	+		+	+
Employment	+	+	+	+	++	++
Equality	0	0	0 / -	++ / +++	-	++ / +++
Health	+	+	+	+	+	+
Heritage	0	0	--	0	++	0
Housing	0 / +	0 / +	+ / ++	++ / +++	+ / ++	++
Land use	0 / -	0 / -	--	0 / -	0 / +	0 / +
Landscape	0 / -	0 / -	--	0 / ?	++	0 / +
Noise	- / --	0 / -	0 / -	-	-	-
Resources	0 / ?	0 / ?	0 / ?	? / -	?	0 / ?
Services & Facilities	+	+	+	++	0 / -	++
Travel	+	+	+ / ++	++	+	++
Waste	0	0	0	0	0	0
Water	0	0	0 / +	0	0 / -	0
Commentary	A reasonable site that scores several neutrals and positives which is well located in terms of provision of services, facilities and transport. The site is let down on biodiversity grounds as it is a designated Site of Nature Conservation Value.	This is a reasonably located site which scores several neutrals and positives, a reflection of its location where there are services and facilities and transport.	This site scores some neutrals and positives but is let down on its heritage, land use and landscape scores. The whole site has archaeological potential and is an historic field. Land use score reflects the findings of the Green Belt Study	This is a reasonable site, located within accessible distance to key services and facilities and transport provision. Being adjacent to the A26 London Road it is let down on its noise score.	Water score reflects fact that there are areas of flood zone 2 and 3 within the site. Business and housing objectives scores positively as the proposed site use is for extensive land-based economic development thus benefitted the rural economy, whilst also meeting housing needs. There are large sites of biodiversity value in the area and, without detail on layout and design, there is a risk these could be negatively impacts upon.	A sustainable site with mostly positive scores. Deprivation and equality scores positively as the proposals would provide some generation in a pocket of income deprivation and are in a location that would promote easy access to facilities for disabled people. The climate change objective scores better than it would have done ordinarily due to the central location of the site and fact that private car use is not essential. This is also reflected in the air, travel and services objectives. However, air quality is scored as mixed overall as the site is partially within the 80m AQMA buffer and provides for parking which would encourage travel by private vehicles.

Appendix G - Capel

Sustainability Objective	Scores for Reasonable Sites in Capel (part 1 of 3)				
	11	48	143	216	307
	Land at and to the rear of 50 Whetsted Road, Five Oak Green, TN12 6RT	Bramley House, Five Oak Green Road, Five Oak Green TN12 6TJ	Land at Tolhurst Road, Five Oak Green	Land at Moat Farm, Whetstead Road, Five Oak Green	Land to the north of Badsell Road, Five Oak Green
Air	0	0	0	0	0 / -
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	0	0	? / -
Deprivation	0	0	0	0	0
Education	0 / +	0 / +	0 / +	0 / +	0 / +
Employment	+	+	+	+	+
Equality	0 / +	+	+	0 / +	+
Health	0	0	0	0	0
Heritage	0	0	0	-	0
Housing	+	+	+	+	+ / + +
Land use	- / - -	- / - -	- / - -	- / - -	- / - -
Landscape	0 / -	0 / -	0 / -	-	-
Noise	- / - -	0	0	- / - -	- -
Resources	? / -	? / -	0 / ?	? / -	0 / ?
Services & Facilities	0 / +	0 / +	0 / +	0 / +	0 / +
Travel	0 / +	0 / +	0 / +	0 / +	0 / +
Waste	0	0	0	0	0
Water	0 / -	0 / -	0 / -	0 / -	0 / -
Commentary	A reasonable site that scores mostly neutrals with some positive scores. The site is let down by a lack of key services, facilities and on its noise score influenced by the location of the site adjacent to the main railway line. Land use also scores negatively influenced by the sites location in the Green Belt parcel BA4 the release of which would have very high impact, recognised that site is a small part of that larger parcel so score adjusted.	A reasonable site that scores a mix of neutrals and positives. It is let down on its land use score, being a Green Belt site within a larger parcel that would cause moderate harm if released and comprising some grade 2 BMV land.	A reasonable site that scores a mix of neutrals and positives. It is let down on its land use score, being a Green Belt site within a larger parcel that would cause moderate harm if released.	Site scores a number of neutrals with some positives, let down by its heritage score in close proximity to three historic farmsteads and on land use and landscape scores, being the loss of a greenfield site part of a broader parcel that makes a very high contribution to the Green Belt.	This site receives a mix of scores, several neutrals and some positive ones. Landscape, land use and noise receive negative scores, a reflection of this Green Belt, greenfield site and its position close to the main railway line.

Nb. Potential sites for a Garden settlement are considered in Chapter 6.

Sustainability Objective	Scores for Reasonable Sites in Capel (part 2 of 3)				
	329	330	331	387	450
	School field, Finches Farm, Five Oak Green, Tonbridge	Finches Farm, Five Oak Green, Tonbridge	Forstal Field, Finches Farm, Five Oak Green, Tonbridge	Capel Grange Lodge, Badsell Road, Five Oak Green	Parcel 1 Land west of Five Oak Green and south of Five Oak Green Road, Capel, Tonbridge
Air	-	-	-	0 / -	-
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	? / -	0	? / -	0	? / -
Deprivation	0	0	0	0	0
Education	0	0 / +	0 / +	0 / +	0
Employment	+	+	+	+	+
Equality	0 / -	0 / -	0 / -	? / +	0 / -
Health	0	0	0	0	0
Heritage	- / - -	- / - -	- / - -	0	0 / -
Housing	++	+	++	0 / +	++
Land use	--	- / - -	--	- / - -	--
Landscape	- / - -	0 / -	- / - -	-	--
Noise	- / - -	-	- / - -	-	- / - -
Resources	0 / ?	? / -	0 / ?	0 / ?	0 / ?
Services & Facilities	0 / -	0 / -	0 / -	0 / +	0 / -
Travel	0 / +	0 / +	0 / +	0 / +	0 / +
Waste	0	0	0	0	0
Water	0 / -	0 / -	0 / -	0 / -	0 / -
Commentary	This site receives a mix of scores including neutrals and some positives. It is let down on its noise score because of its location close to the main railway line. Land use also scores a negative as the site is part of a Green Belt parcel the release of which would cause moderate harm and for heritage and landscape, being adjacent to historic farmsteads.	This site receives a mix of scores including neutrals and some positives. It is let down on its noise score because of its location close to the main railway line. Land use also scores a negative as the site is part of a Green Belt parcel the release of which would cause moderate harm, though it is influenced by existing built development on the site, and for heritage and landscape, being adjacent to historic farmsteads.	This site receives a mix of scores including neutrals and some positives. It is let down on its noise score because of its location close to the main railway line. Land use also scores a negative as the site is part of a Green Belt parcel the release of which would cause moderate harm and for heritage and landscape, being adjacent to historic farmsteads.	This site receives a mix of scores, several neutrals and some positive ones. Landscape, land use and noise receive negative scores, a reflection of this Green Belt, greenfield site and its position close to the main railway line.	This sites scores mostly neutrals with some positive scores. It is a greenfield site in the Green Belt and forms a parcel the release of which would cause high harm to the Green Belt. This influences the land use score. The loss of a greenfield site in the historic landscape, adjacent to an historic farmstead which forms part of the setting of Five Oak Green influences the negative landscape score given.

Sustainability Objective	Scores for Reasonable Sites in Capel (part 3 of 3)				
	451	AS_10	AS_12	454	AS_29
	Parcel 2 Land west of Five Oak Green and south of Five Oak Green Road, Capel, Tonbridge	Orchard Brook, Five Oak Green Road, Five Oak Green, Tonbridge	Land on the south side of Five Oak Green Road, Five Oak Green, Tonbridge	Land to the east of Tonbridge/west of site for Tudeley Village (including 447)	Land at Sychem Lane, Five Oak Green
Air	-	0 / +	0 / +	0 / -	0 / -
Biodiversity	0	0	0	0 / -	0
Business Growth	0	0	0	0	0
Climate Change	? / -	0	0	0 / ?	0
Deprivation	0	0	0	0	0
Education	0	0 / +	0 / +	+++	0 / +
Employment	+	+	+	++	+
Equality	0 / -	+	+	++	+
Health	0	0	0	0	0
Heritage	0 / -	0	0	0	-
Housing	++	+	+	0	++
Land use	- / - -	- - / - - -	- -	- -	- - / - - -
Landscape	- -	0 / -	- / - -	- / - -	- -
Noise	- / - -	0	0	0 / -	0
Resources	0 / ?	? / -	? / -	0 / ?	? / -
Services & Facilities	0 / -	0 / +	0 / +	0	-
Travel	0 / +	0 / +	0	0 / +	0 / +
Waste	0	0	0	0	0
Water	0 / -	0 / -	0 / -	0	0 / -
Commentary	This sites scores mostly neutrals with some positive scores. It is a greenfield site in the Green Belt and forms part of a larger parcel the release of which would cause very high harm to the Green Belt. The site is a relatively small part of that so the score has been adjusted to reflect this. This influences the land use score. The loss of a greenfield site in the historic landscape, adjacent to an historic farmstead which forms part of the setting of Five Oak Green influences the negative landscape score given.	A site that scores several neutrals and some positives. It is let down on its land use and landscape score reflecting the loss of a greenfield site located within the Green Belt being part of parcel FG3 which scores moderately in the Green Belt Study. A large part of the site is also agricultural Grade 2 which influences this score. This site would have a negative impact on the landscape setting of the settlement.	A site that scores several neutrals and some positives. It is currently constrained by the lack of vehicular access. It is let down on its land use and landscape score reflecting the loss of a greenfield site located within the Green Belt being part of a larger broad parcel (score adjusted to reflect this) that would have very high harm if released from the Green Belt. A large part of the site is also agricultural Grade 2 which influences this score. This site would have a negative impact on the landscape setting of the settlement.	A mixed site. Bus travel is likely to be preferred for most to access the school from TGS which represents a slight worsening of noise pollution and air quality compared to the current rural baseline. However, the improvements in bus services create a positive transport score thus this is a rare site where these objectives do not reflect one another.	A site that scores several neutrals and some positives. It is currently constrained by the lack of suitable pedestrian access to the settlement but it is likely this could be overcome. It is let down on its land use and landscape score reflecting the loss of a greenfield site located within the Green Belt being the significant extent of parcel FG3 which scores moderately in the Green Belt Study. A large part of the site is also agricultural Grade 2 which influences this score. This site would have a negative impact on the landscape setting of the settlement and whilst some parts of the site are closer to the services and facilities of the settlement, some parts are less accessible.

Appendix H - Paddock Wood

Sustainability Objective	Scores for Reasonable Sites in Paddock Wood		
	EA_b	MF_1	AS_52
	Town Centre (including sites 272 and 276)	Land at the Memorial Field, west of Maidstone Road	Land at Mascalls Farm
Air	+	0 / -	0 / -
Biodiversity	0	0 / -	0 / -
Business Growth	++ / +++	0	0
Climate Change	? / -	? / --	? / --
Deprivation	+ / ++	0	0
Education	+	+	+
Employment	++	+	+
Equality	+	+	+
Health	0 / +	+	+
Heritage	0	--	-
Housing	0 / +	++ / +++	++ / +++
Land use	+	--	--
Landscape	0 / +	- / --	- / --
Noise	0	0 / -	0 / -
Resources	?	0 / ?	0 / ?
Services & Facilities	++	+ / ++	+ / ++
Travel	++ / +++	+	+
Waste	0	0	0
Water	0 / +	0	0
Commentary	<p>This policy is largely sustainable. It would have a highly positive impact upon regeneration as Paddock Wood is one of the worst Areas of Income Deprivation in the Borough. The proposal would also provide employment and opportunities for growth of key businesses, as well as improving the range of available retail and leisure. It is likely that this regeneration will have positive impacts upon local townscape. The proposal scores positively for the water objective as the master planning approach is likely to provide an opportunity to improve upon the existing impacts from flooding in the town through SUDs for example.</p>	<p>This site has a range of positive and negative scores. Increased pressure that the new residents would put on the local primary school is negated somewhat by the construction of a new primary school opposite Mascalls Secondary school (construction started in 2019). The relatively large numbers of dwellings here means increased pressure on water supplies negates the benefits created by improving drainage and flooding on site. Air quality impacts are improved by the connectivity with PW and thus reduced need for private vehicles, but still remain slightly negative overall as private car use is still likely in this edge of semi-rural settlement location. It is expected that recreational pressure will occur on the adjacent Local Nature Reserve. Finally, overall the development represents a significant change to the setting of the historic landscape.</p>	<p>This site has a range of positive and negative scores. Increased pressure that the new residents would put on the local primary school is negated somewhat by the construction of a new primary school opposite Mascalls Secondary school (construction started in 2019). The relatively large numbers of dwellings here means increased pressure on water supplies negates the benefits created by improving drainage and flooding on site. Air quality impacts are improved by the connectivity with PW and thus reduced need for private vehicles, but still remain slightly negative overall as private car use is still likely in this edge of semi-rural settlement location. It is expected that recreational pressure will occur on the adjacent Local Nature Reserve. Finally, overall the development represents a significant change to the setting of the historic landscape.</p>

Nb. Potential sites for an urban extension are considered in Chapter 6.

Appendix I - Cranbrook and Sissinghurst

Sustainability Objective	Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 1 of 7)				
	25	29	29	54	92
	Land to the west of Frythe Way and east of Freight Lane, Cranbrook	WHOLE SITE Land at Boycourt Orchards, A229 Angley Road, Wisley Pound, Cranbrook TN17 2HR	PART SITE: Land at Boycourt Orchards, A229 Angley Road, Wisley Pound, Cranbrook TN17 2HR	Land on the east side of Mill Lane, Sissinghurst, TN17 2HX	Land south of Grove Cottage, Tilsden Lane, Cranbrook TN17 3PJ
Air	0 / -	-	-	0	--
Biodiversity	0	0	0	0	- / --
Business Growth	0	0	0	0	? / 0
Climate Change	? / -	? / -	0	0	? / ---
Deprivation	0	0	0	0	? / 0
Education	+	0 / -	0 / -	0 / -	-
Employment	+	+	+	+	+
Equality	0 / +	0 / -	0 / -	0 / +	0 / +
Health	+	0 / +	0 / +	0 / +	0 / +
Heritage	0 / -	0	0	0	-- / ---
Housing	++	0 / +	0 / +	0 / +	+++
Land use	- / --	- / --	- / --	- / --	-- / ---
Landscape	- / --	- / --	0 / -	0 / -	---
Noise	0	0	0	0	- / --
Resources	?	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	0	-	-	-	-
Travel	0 / -	- / --	- / --	0 / -	-- / ---
Waste	0	0	0	0	0
Water	0 / -	0 / +	0 / +	0	0 / -
Commentary	This site scores largely neutral with some benefit to housing provision. It scores negatively on land use and landscape impact informed by the loss of a greenfield site in the AONB which lies adjacent to an historic settlement and which has historic routeways (PROW) adjacent to it.	A range of scores with Land Use, Landscape and Travel objectives scoring most negatively reflecting loss of greenfield land in the AONB and limited transport options in Sissinghurst.	Same scores as the SA for the whole site except with slightly reduced impacts on the Landscape objective to reflect smaller area for allocation.	Largely neutral-scoring site. Education is scored slightly negative to reflect increase pressure on a school that is already in high demand. Loss of greenfield land and potential boundary issues with the AONB contribute to the negative scores for Land Use and Landscape.	This site is a larger site that scores mostly negative with benefit to housing provision. Negative scores are influenced by the larger site and loss of greenfield site in the AONB, part of which is an historic field adjacent to historic farmsteads. Negative biodiversity score reflects combination of size of site and relative closeness to SSSI.

Sustainability Objective	Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 2 of 7)				
	110	120	122	125	
	Land to the west of Co-operative, High Street, Cranbrook TN17 3DQ	Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road, Sissinghurst	Gate Farmland at Charity Farm, Swattenden Lane, Cranbrook TN17 3PS	WHOLE SITE Land adjoining Wilsley Farm, adjacent to Angley Road and Whitewell Lane, Cranbrook, TN17 2LE	PART SITE: Land adjoining Wilsley Farm, adjacent to Angley Road and Whitewell Lane, Cranbrook, TN17 2LE
Air	0 / +	0	-	0 / -	0 / -
Biodiversity	0	0	- / - -	0	0
Business Growth	0 / +	0	0	0	0
Climate Change	? / -	0	? / -	? / -	0
Deprivation	? / 0	0	0	0	0
Education	0 / +	0 / -	0 / -	+	+
Employment	+	+	+	+	+
Equality	0	0 / +	0 / -	0	0
Health	0 / +	0 / +	0 / +	0 / +	0 / +
Heritage	0 / -	-	0 / -	-	-
Housing	0 / +	0 / +	+	0 / +	0 / +
Land use	- - -	- / - -	- / - -	- / - -	- / - -
Landscape	+	-	- / - -	-	-
Noise	0	0	0 / -	0 / -	0 / -
Resources	0 / ?	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	+	-	-	0 / -	0 / -
Travel	0 / +	0 / -	- / - -	0 / -	0 / -
Waste	0	0	0	0	0
Water	0	0	0	0 / +	0 / +
Commentary	This site scores mostly neutral with some benefit potentially to housing provision and employment. It scores negatively in land use terms being loss of a greenfield site in the AONB. It is however within the Limits to Built Development of Cranbrook, which lessens impact.	Largely neutral-scoring site. Education is scored slightly negative to reflect increase pressure on a school that is already in high demand. Loss of greenfield land and potential boundary issues with the AONB contribute to the negative scores for Land Use and Landscape.	This site scores mostly negative, particularly in landscape and land use terms and for travel and lack of key services and facilities. It scores positively in terms of housing provision	A mixed site with slight positive and negatives across the objectives. Loss of greenfield land causes the most negative impact to be on Land Use.	Same scores as the SA for the whole site.

Sustainability Objective	Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 3 of 7)				
	129	130	131	132	133
	Big Side Playing Field adjacent to Quaker Lane and Waterloo Road, Cranbrook	Cranbrook School Main Campus, Waterloo Road, TN17 3JD (including site 128)	Jaegers Field, Angley Road, Cranbrook	Rammell Field, Bakers Cross, Cranbrook	Land adjoining Cranbrook Primary School, Quaker Lane Cranbrook (includes site 71)
Air	0	?	0	0 / +	0
Biodiversity	0	?	0	0	0
Business Growth	0	?	0	0	0
Climate Change	0	?	0	? / -	0
Deprivation	0	?	0	0	0
Education	+	+++	+	+	+
Employment	+	?	+	+	+
Equality	+	- / ?	+	++	+
Health	0 / +	?	+	+	+
Heritage	-	?	0	--	0 / ?
Housing	+	?	+	+	+
Land use	- / - -	0 / ?	- / - -	-	- / - -
Landscape	-	?	-	--	-
Noise	0	?	0	0	0 / -
Resources	0 / ?	?	0 / ?	0 / ?	0 / ?
Services & Facilities	0 / -	?	0 / -	0 / +	0 / -
Travel	0	?	0	0	0
Waste	0	?	0	0	0
Water	0 / +	?	0 / +	0	0 / +
Commentary	Largely sustainable site with the only negatives being related to the sensitive environmental features.	This policy prompts mostly unknown scores as details about specific proposal are not available. However, it is assumed that education would benefit.	Largely sustainable site with the only negatives being related to the sensitive environmental features.	A site that scores mostly neutrals with some positives. It scores negatively on its heritage score as a result of the contribution the site makes to Conservation Area and its setting. It scores negatively on landscape and the loss of the site would result in the loss of an historic field in the AONB.	Largely sustainable site with the only negatives being related to the sensitive environmental features.

Sustainability Objective	Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 4 of 7)				
	159	188	271	296	396
	Land south of The Street, Sissinghurst (and late site 51)	Land adjacent to Hartley Dyke, Cranbrook	Land at Crane Lane including WC block and Wilkes Field, Cranbrook	Oak Tree Farm, The Common, Wilsey Pound, Cranbrook	Land West of Freight Lane, Cranbrook
Air	0	-	0 / +	-	0 / -
Biodiversity	0	-	0 / -	0	-
Business Growth	0	0	0 / +	0	0
Climate Change	0	0	0	0	-
Deprivation	0	0	0	0	0
Education	0 / -	0 / -	+	0 / -	0 / -
Employment	+	+	+	+	+
Equality	+ / + +	0 / -	+ +	0 / -	+
Health	0 / +	0 / -	+	0 / +	0 / +
Heritage	0	- / - -	-	?	0 / -
Housing	+	+ +	+ / + +	0 / +	+ / + +
Land use	- / - -	- -	0 / -	- / - -	- / - -
Landscape	-	- - / - - -	- / - -	0 / -	- / - -
Noise	0	-	0	0	0
Resources	0 / ?	0 / ?	+ / ?	0 / ?	0 / ?
Services & Facilities	-	-	0 / +	-	0 / -
Travel	0	- / - -	0	- / - -	-
Waste	0	0	0	0	0
Water	0 / +	0	0	0 / +	0 / -
Commentary	Social objectives for this site are given a range of scores. Educational pressures are expected on the already oversubscribed primary school but the equality, health and housing objectives score positively.	This site scores mostly negative, particularly in landscape and land use terms and for travel. It scores positively in terms of housing provision. The negative scores are informed by the loss of a sensitive greenfield site in the AONB which is adjacent to an historic settlement and historic routeway (road). It lies within close proximity of a SSSI.	The town centre location of this site causes numerous objectives to turn positive reflecting the better access to travel options and ability to access the services and facilities in Cranbrook without private car.	Specialist heritage advice is recommended for this site. The proposals would represent a dilution of the historic settlement character.	This site scores largely neutral with some benefit to housing provision. It scores negatively in landscape terms informed by the loss of an historic field in the AONB and adjacent to historic farmstead.

Sustainability Objective	Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 5 of 7)				
	407	409	430	442	AS_6
	Land at Brooksden, High Street, Cranbrook	The High Weald Academy, Angley Road, Cranbrook	Turnden Farm, Hartley Road, Cranbrook	Land Adjacent Orchard Cottage, Frittenden Road, Sissinghurst (includes site 68)	Part OS Plot 2429 Common Road, Sissinghurst, Cranbrook
Air	+	0	0 / -	0	0
Biodiversity	0 / -	0	-	0	0
Business Growth	0	0	+	0	0
Climate Change	0	0	? / -	0	0
Deprivation	0	0	?	0	0
Education	+	?	0 / -	+++	0 / -
Employment	?	?	+	0	+
Equality	0	+	+	0	0 / -
Health	0	+	0 / +	0	0
Heritage	0	0	- / - -	0	0 / -
Housing	0 / +	+	++	0	0 / +
Land use	-	+	--	0	- / - -
Landscape	0 / -	0	-- / - - -	0	- / - -
Noise	0	? / 0	-	0	0
Resources	0 / ?	? / -	+ / ?	0	0 / ?
Services & Facilities	+	0 / -	0 / -	0	- -
Travel	0	0	-	0	0 / -
Waste	0	0	0	0	0
Water	0	0	0 / -	0	0 / ?
Commentary	This site scores largely neutral with some benefit to housing provision. The negative land use score reflects the part greenfield nature of the site in the AONB.	A reasonable site that scores positively for land use as it is a Previously Developed site. It scores several neutral scores and some unknown scores for education and employment which reflect the current educational use of some of the site and uncertainty about the loss of this and associated employment.	A relatively large site that would contribute a significant benefit to housing numbers but is scored highly negatively for environmental objectives to reflect the sensitive features that are at risk.	This policy has a specific remit and thus scores very positive in the education objective with other objectives given neutral scores as have no relevance.	This site scores mostly neutral, with some positive scores. It is let down by accessibility to services and facilities and public transport and also land use and landscape scores informed by the loss of a greenfield site and location of site relative to settlement.

Sustainability Objective	Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 6 of 7)		
	AS_30	AS_32	AS_37
	Pinecroft, Frittenden Road, Sissinghurst, TN17 2AQ	Land off of Waterloo Road, Cranbrook,	Glenn House, Hartley Road, Cranbrook. TN17 3QP
Air	0	0 / -	-
Biodiversity	0	0 / -	-
Business Growth	0	0	0
Climate Change	0	? / -	0
Deprivation	0	0	0
Education	0 / -	0 / -	0 / +
Employment	+	+	+
Equality	0 / -	+	-
Health	0	0 / +	0 / +
Heritage	0 / -	0 / -	0
Housing	0 / +	++	+
Land use	0	--	- / --
Landscape	0 / -	- / --	-
Noise	0	0	0 / -
Resources	0 / ?	0 / ?	? / -
Services & Facilities	--	0 / -	-
Travel	0 / -	0 / -	- / --
Waste	0	0	0
Water	0 / ?	0 / -	0
Commentary	This site scores mostly neutral, with some positive scores. It is let down by accessibility to services and facilities and public transport. Also landscape score informed by location of site relative to settlement.	The proposed housing density is considered high for this site given sensitive landscape and edge of settlement location. The site would suit low density, farmstead style development.	A site that scores several neutrals with some positives along with several negative scores. It is let down by accessibility to key services and facilities and public transport and would result in the loss of a greenfield site in the AONB located adjacent to and forming part of the setting of an historic settlement. The equality score is let down by concerns about the ability of the less able to gain access to the services and facilities with their being a lack of pavement along Turnden Road, whilst the score on biodiversity is negative, influenced by potential scale of development in a SSSI buffer zone and rural area and proximity of the site to Ancient Woodland and a designated National Nature Reserve and Biodiversity Opportunity Area further north of the site.

Sustainability Objective	Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 7 of 7)		
	59	292	SC_1
	Hartley Parcels (including sites 70, 323, 345 and late site 53)	Land adjacent to Crane Valley (including part of 396)	Sissinghurst Castle
Air	-	0 / -	0 / +
Biodiversity	-	-	+
Business Growth	+	0	0 / +
Climate Change	? / -	-	0 / +
Deprivation	?	0	0
Education	0 / +	0 / -	0
Employment	++	+	0
Equality	0 / -	+	0 / +
Health	0 / +	0 / +	0
Heritage	0 / -	--	+
Housing	+	++ / +++	0
Land use	- / --	--	0
Landscape	-	-	+
Noise	0 / -	-	0
Resources	?	0 / ?	0
Services & Facilities	-	0 / -	0 / +
Travel	- / --	-	0 / +
Waste	0	0	0
Water	0	0 / -	0
Commentary	This group of sites has positive impacts on some economic and social objectives but it let down by the distance to Cranbrook town centre.	A mostly negative site. Site area is relatively large site so would contribute a significant benefit to housing numbers but is scored highly negatively for many environmental objectives to reflect the sensitive features that are at risk.	This policy scores largely neutral or positive with specific benefits to tourism, access to heritage assets and improvements to transport modes.

Appendix J - Hawkhurst

Sustainability Objective	Scores for Reasonable Sites in Hawkhurst (part 1 of 7)				
	2	17	19	33	52
	Chittenden Fields, adjacent to High Street and Slip Mill Road, Hawkhurst	Land adjacent to High Banks Nursery, Cranbrook Road, Gill's Green,	Land at Heartenoak Road, Hawkhurst	Land south of Woodham Hall, Rye Road, Hawkhurst TN18 5DA	Land and property at Streatley, Horns Road, Hawkhurst TN18 4QT
Air	0 / -	-	0	0 / -	0
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	0	0	? / -
Deprivation	0	0	0	0	0
Education	0	+	+	+	0
Employment	+	+	+	+	+
Equality	0	-	-	0	-
Health	0	0	0	0	0
Heritage	0	0	0	0	-
Housing	+ / ++	0	+	+	+
Land use	- / --	- / --	- / --	- / --	- / --
Landscape	-- / ---	- / --	-	--	--
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	? / -	0 / ?
Services & Facilities	0 / -	0 / -	0 / -	0 / -	- / --
Travel	0 / -	0 / -	0 / -	0 / -	-
Waste	0	0	0	0	0
Water	0	0 / +	0	0 / -	0
Commentary	A site that scores mostly neutral, with some positives and which has a flat access from its frontage with High Street to the centre of the settlement. It is let down by its impact on the landscape (AONB), being loss of an historic field and in land use terms, being loss of grade 3 soils and greenfield site.	This site scores some neutrals and some positives but is let down by a lack of key services and facilities and lack of public transport options. It is let down on land use score influenced by agricultural grade 3 land and loss of greenfield land in the AONB.	Site scores mostly neutral, let down by a lack of key services and facilities and public transport options. Land use and landscape impact score negatively influenced by loss of greenfield site in the AONB, which is an historic field.	A site that scores mostly neutral with some positive scores. Let down by negative score for land use being the loss of a greenfield site and loss of grade 3 agricultural soils and landscape being the loss of greenfield site in the AONB sensitive in landscape terms and in an historic landscape.	This site scores mostly neutral with a positive benefit in terms of housing provision. It scores negatively in landscape and land use terms being the loss of a greenfield site in the AONB. It is further removed than some sites to a lack of key services and facilities and public transport options.

Sustainability Objective	Scores for Reasonable Sites in Hawkhurst (part 2 of 7)			
	55	86	102	107
	March's Field, Lime Grove, Gill's Green TN18 5BD	Land at Highgate Hill, Hawkhurst (Phase 2)	Hawkhurst Station Business Park, Gill's Green TN18 5BD	Hawkhurst Place Farm, Rye Road, Hawkhurst TN18 5DA
Air	-	0 / +	-	0 / -
Biodiversity	0	0	0	0
Business Growth	+	0	+	0
Climate Change	? / -	? / -	? / -	0
Deprivation	?	0	?	0
Education	0	0	0	+
Employment	++	+	++	+
Equality	0	+ / ++	0	+
Health	0	0	0	+
Heritage	0	0 / -	0	-
Housing	0	++	0	+
Land use	- / - -	- / - -	- / - -	- / - -
Landscape	-	- -	-	- -
Noise	0	0	0	0
Resources	?	0 / ?	0 / ?	0 / ?
Services & Facilities	0	0 / +	0	0 / -
Travel	- / - -	0	- / - -	0 / -
Waste	0	0	0	0
Water	0 / ?	0	0 / ?	0 / -
Commentary	Gills Green is a Key Employment Area and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Travel and air quality objectives score poorly due to the topography and distance for reaching the services at Hawkhurst using active travel. Landscape issues are also negative due to far reaching views and the impact upon the character of the AONB. Land use score reflects the loss of greenfield land and useful soils within the AONB.	Scores mostly neutral with some positives though has negative landscape and land use scores reflecting loss of historic field / greenfield site in AONB and historic landscape, with grade 3 agricultural soils.	Gills Green is a Key Employment Area and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Travel and air quality objectives score poorly due to the topography and distance for reaching the services at Hawkhurst using active travel. Landscape issues are also negative due to far reaching views and the impact upon the character of the AONB. Land use score reflects the loss of greenfield land and useful soils within the AONB.	A site that scores neutrals and some positives. It is let down on its land use score influenced by the loss of a greenfield site, with grade 3 agricultural soils and landscape score being the loss of an historic field in the AONB. There is an historic field and lies adjacent to an historic farmstead which informs the heritage score.

Sustainability Objective	Scores for Reasonable Sites in Hawkhurst (part 3 of 7)			
	115	167	201	284
	Land forming part of the Hawkhurst Golf Course to the north of High Street, Hawkhurst TN18 4JS	Land on the north west side of Heartenoak Road, Hawkhurst	Land at Sessele House and Marlborough House School, High Street, TN18 4PY	Dee House, Rye Road, Hawkhurst
Air	+	0 / -	0 / -	0
Biodiversity	0	0	0	0
Business Growth	0 / ?	0	0 / -	0
Climate Change	? / -	? / -	? / -	0
Deprivation	0	0	0	0
Education	0	0	0 / +	+
Employment	+	+	?	+
Equality	+	+	+	+
Health	0	0	0	+
Heritage	-	-	0	0
Housing	++	+ / ++	+	0 / +
Land use	- / - -	- / - -	-	0 / +
Landscape	- - / - - -	- / - -	-	+
Noise	+	0	0	0
Resources	?	0 / ?	? / -	? / -
Services & Facilities	0 / -	0 / -	0 / -	0 / -
Travel	0 / +	0 / -	0 / -	0
Waste	0	0	0	0
Water	0 / -	0 / -	0	0
Commentary	<p>A significant site with mixed scores. The large size of the site benefits the housing objective but is out of keeping with the existing rural settlement and thus will have adverse impacts on heritage assets and the character of the AONB. Adverse land use, carbon and water scores also reflect the pressures created by a large site in this location. Despite being a predominantly greenfield site, the previous use as a golf course would mean impacts upon biodiversity are limited and can be adequately controlled with protection buffers. The large site also brings benefits in the form of likely onsite provision of open space and community facilities which could help address inequalities, and bring significant contributions to help improve bus services and active travel links. The relief road is a significant piece of transport infrastructure and is likely to bring noise and air benefits to the centre of Hawkhurst. However, transboundary effects may be experienced at the Flimwell junction (Rother District Council) as more traffic is diverted this way. It is not known whether closing Cranbrook road would reduce passing trade or benefit local business by making a more pleasant pedestrian environment. For this reason impacts upon the business objective are unknown. Slight negative scores for services and facilities reflect the fact that Hawkhurst lacks a train station, is distant from key shopping areas and car travel is preferable in rural settlements. Some residents within the site will be outside of desirable walking distances.</p> <p>A site with a mixture of mostly neutral and positive scores. It is let down on landscape and land use grounds. Part of the site is an historic field and there are historic routeways. The site is outside of desirable walking distance so car use will dominate especially as Hawkhurst lacks a train station and is distant from significant retail and leisure facilities.</p> <p>A site that scores mostly neutral. It is part of an existing school and as such deliverability is uncertain. It results in loss of a greenfield site in the AONB, but impact likely to be limited as is a small site.</p> <p>A site that scores mostly neutral that includes existing built development.</p>			

Sustainability Objective	Scores for Reasonable Sites in Hawkhurst (part 4 of 7)				
	291	334	350	351	361
	Field at Cranbrook Road, Hawkhurst	South west Side of Hearten Oak Lane, Hawkhurst	High Banks Garden Centre, Cranbrook Road, Hawkhurst	High Banks, Slip Mill Road, Hawkhurst	Land at The White House, Highgate Hill, Hawkhurst
Air	-	0	-	-	0
Biodiversity	0	0	0	0 / -	0
Business Growth	0 / -	0	-	-	0
Climate Change	? / -	? / -	? / -	0	0
Deprivation	?	0	?	?	0
Education	0	+	0	0	+
Employment	+	+	+	+	+
Equality	-	+	-	-	+ / + +
Health	0	0	0	0	0
Heritage	0	0	0	0	-
Housing	0	+	0	0 / +	+
Land use	- / - -	- / - -	- / - -	0 / -	-
Landscape	- / - -	-	- / - -	-	0 / -
Noise	0	0	0	0	0 / -
Resources	? / -	0 / ?	? / -	? / -	?
Services & Facilities	0 / -	0 / -	0 / -	-	0 / +
Travel	0 / -	-	0 / -	- / - -	0
Waste	0	0	0	0 / -	0
Water	0 / +	0	0 / +	0	0
Commentary	A site that includes some existing built development. It scores neutrals and some positives but is let down by a lack of key services and facilities and lack of public transport options. It is let down on land use score influenced by agricultural grade 3 land and loss of greenfield land in the AONB.	A site with a mixture of mostly neutral and positive scores, let down on land use and landscape scores, reflecting location relative to the settlement centre and loss of historic field in the AONB.. There is concern about lack of footway along Heartenoak Road and pedestrian accessibility to services and facilities including public transport. The site is outside of desirable walking distance so car use will dominate especially as Hawkhurst lacks a train station and is distant from significant retail and leisure facilities.	A site that includes some existing built development. It scores neutrals and some positives but is let down by a lack of key services and facilities and lack of public transport options. It is let down on land use score influenced by agricultural grade 3 land and loss of greenfield land in the AONB.	A site that contains existing built development. It is let down by the lack of key services and facilities/transport.	A reasonable site with mostly neutral or positive scores that largely reflect the location within desirable walking distance of facilities and services. Slight negative score for landscape and heritage reflect the high sensitivity of the landscape and change in setting of a non designated heritage asset. There is also no guarantee that the asset would not be demolished. However, preservation of the building and sensitive design will help reduce significant impacts. The site is located in an area of high road noise thus scores negatively both for its potential to worsen this through additional car movements and for the comfort of the new residents.

Sustainability Objective	Scores for Reasonable Sites in Hawkhurst (part 5 of 7)				
	391	392	394	413	413
	Rear of Limes Grove Oast, Slip Mill Road, Hawkhurst	Trewint Farm and Jacks Paddock, Slip Mill Lane, Hawkhurst	Land west of Slip Mill Lane at Trewint Farm, Slip Mill Lane, Hawkhurst	WHOLE SITE: Land at Fowlers Park, Hawkhurst	PART SITE: Land at Fowlers Park, Hawkhurst
Air	-	0 / -	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0	0
Business Growth	+	0	0	0	0
Climate Change	0	0	0	? / -	? / -
Deprivation	?	0	0	0	0
Education	0	0	0	++	++
Employment	++	+	+	+	+
Equality	-	-	-	? / +	? / +
Health	0	0	0	0	0
Heritage	0	0	-	-	-
Housing	0	0 / +	0 / +	+ / ++	+ / ++
Land use	- / - -	0 / -	- / - -	- / - -	-
Landscape	-	- / - -	- / - -	- -	-
Noise	0	0	0	0	0
Resources	?	? / -	0 / ?	0 / ?	0 / ?
Services & Facilities	0	-	-	0 / -	0 / -
Travel	- / - -	- / - -	- / - -	-	-
Waste	0	0 / -	0	0	0
Water	0 / ?	0	0 / -	0 / -	0
Commentary	Gills Green is a Key Employment Area and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Travel and air quality objectives score poorly due to the topography and distance for reaching the services at Hawkhurst using active travel. Landscape issues are also negative due to far reaching views and the impact upon the character of the AONB. Land use score reflects the loss of greenfield land and useful soils within the AONB.	A site on which there is existing built development, let down by access to a lack of services and facilities and location of site in relation to settlement centre. Negative landscape score informed by impact on historic field and historic routeways.	A greenfield site which is an historic field located in the AONB. This is reflected in the negative landscape score received and land use score influenced by the greenfield site. The site scores negatively for services and facilities and transport, a reflection of the relatively remote location of the site relative to the settlement centre and public transport options.	A large site which provides a relatively significant quantity of new dwellings. Substantial open space buffers help reduce landscape impacts but the sensitive edge of settlement location is still likely to cause impacts upon the character of the AONB and the wider historic environment. The large number of dwellings will also put pressure upon local water resources. Scores for equality, air, travel and services are dependent upon the availability of a more direct pedestrian route onto Rye Road and could be improved if one is found. Housing density seems high given edge of settlement location and sensitive landscape. The positive education score reflects the suitability of the site to safeguard land for expansion of the primary school. A large site which provides a relatively significant quantity of new dwellings. Substantial open space buffers help reduce landscape impacts but the sensitive edge of settlement location is still likely to cause impacts upon the character of the AONB and the wider historic environment. The large number of dwellings will also put pressure upon local water resources. Scores for equality, air, travel and services are dependent upon the availability of a more direct pedestrian route onto Rye Road and could be improved if one is found. Housing density seems high given edge of settlement location and sensitive landscape. The positive education score reflects the suitability of the site to safeguard land for expansion of the primary school.	

Sustainability Objective	Scores for Reasonable Sites in Hawkhurst (part 6 of 7)				
	422	432	432	433	455
	Santers Yard, Gills Green Farm, Gills Green, Hawkhurst	WHOLE SITE: Land to the east of Hearten oak Road, Hawkhurst	PART SITE; Land to the east of Hearten oak Road, Hawkhurst	OS Plot 7007, Cranbrook Road, Hawkhurst	Whitewood Farm, White Lane, Hawkhurst
Air	-	0	0	0	0 / -
Biodiversity	0	0	0	0 / -	0
Business Growth	+	0	0	0	0
Climate Change	? / -	? / -	0	0	? / -
Deprivation	?	0	0	0	0
Education	+	+	+	+	++
Employment	++	+	+	+	+
Equality	-	+	+	-	+
Health	0	0	0	0	0
Heritage	0	0 / -	0	0	0
Housing	0 / +	+ / ++	+	0 / +	+
Land use	- / - -	-	-	- / - -	- / - -
Landscape	-	-	0 / -	-	-
Noise	0	0	0	0	0
Resources	? / +	0 / ?	0 / ?	0 / ?	? / -
Services & Facilities	-	0 / -	0 / -	0 / -	0 / -
Travel	- / - -	0 / -	0 / -	0 / -	-
Waste	0	0	0	0	0
Water	0 / ?	0	0	0 / ?	0 / -
Commentary	Gills Green is a Key Employment Area and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Lack of facilities and services in Gills Green means the location is not well suited to housing and so equality, travel and services objectives score negatively (disabled persons may not be able to live there). The policy wording to avoid demolition makes the resources objective slightly positive.	A site with a mixture of mostly neutral and positive scores. Let down on landscape and land use scores, resulting in loss of grade 3 land in the AONB and impacting upon landscape setting of the settlement. The site is outside of desirable walking distance so car use will dominate especially as Hawkhurst lacks a train station and is distant from significant retail and leisure facilities.	A reasonable site with a mixture of mostly neutral and positive scores reflecting the relatively small number of dwellings. Large open space buffers will help reduce landscape and land use impacts. However, the edge of settlement location within the AONB will still result in a slight negative impact. The site is outside of desirable walking distance so car use will dominate especially as Hawkhurst lacks a train station and is distant from significant retail and leisure facilities.	A site that scores mostly neutral that is let down by lack of key services and facilities and on landscape grounds	A site with some positive and neutral scores. Let down by negative scores reflecting impact on landscape and potential scale of development. It is a greenfield site in the AONB with grade 3 agricultural soils. White's Lane is rural in character and an historic routeway, influencing negative land use and landscape scores.

Sustainability Objective	Scores for Reasonable Sites in Hawkhurst (part 7 of 7)			
	AS_3	BH_1	78	EA_SP
	Land to the west of Cranbrook Road, Gills Green	Brook House, Cranbrook Road, Hawkhurst	Land off Copthall Avenue and Highgate Hill, Hawkhurst (including 419)	Site at Sports Pavillion, King George V Playing Fields, The Moor
Air	-	0	0 / -	0
Biodiversity	0	0	0	0
Business Growth	+	0	0	0
Climate Change	? / -	0	0	0
Deprivation	?	0	0	0
Education	+	+	+	0
Employment	+	+	+	0
Equality	-	0	0	0
Health	0	0	0	0 / +
Heritage	--	0	0	0
Housing	+	+	+	0
Land use	- / - -	-	-	0
Landscape	-	0 / -	-	0
Noise	0	0	0 / -	0
Resources	0 / ?	? / -	? / -	?
Services & Facilities	-	0 / -	0 / -	0 / +
Travel	- / - -	0 / -	0 / -	0
Waste	0	0	0	0
Water	0 / ?	0	0	0
Commentary	<p>A site that scores several neutrals and some positives. It scores a number of negatives scores. Its heritage score is influenced by the presence of a listed building on the site and the contribution the site makes to the setting of that and the historic farmstead. The site would result in the loss of a greenfield site in the AONB adjacent to which is an historic routeway (road), these inform the land use and landscape scores. It scores negatively for services, facilities and transport given the location of Gill's Green relative to the settlement centre and equality also due to concern about ease of access to services and facilities for the less mobile.</p>	<p>A reasonable site. However, the location at the bottom of a steep hill outside of reasonable walking distances means private car use is likely to dominate and thus the equality and travel objectives cannot score positively. The location in the AONB is reflected in the slightly negative score for landscape. The design must consider the mature trees on site.</p>	<p>This site scores similarly to Site 413 (Land at Fowlers Park). Coalescence between Highgate and the Moor needs consideration and impacts will be reduced by open space buffers. The site is located in an area of high road noise thus scores negatively for its potential to worsen this situation through additional car movements.</p>	<p>A largely neutral site that scores positively for health and services objectives reflecting the opportunity to make improvements to the existing leisure facilities.</p>

Appendix K - Benenden

Sustainability Objective	Scores for Reasonable Sites in Benenden (part 1 of 2)				
	35	158	222	277	425
	Land at Walkhurst Road, Benenden	Land to the rear of Greenacres, The Street, and adjacent to New Pond Road, Benenden	Land on the west side of Iden Green Road, Benenden, TN17 4ES	Feoffee Cottages and Land Walkhurst Road, Benenden, Cranbrook	Land to the east of Mockbeggar Lane, Benenden, Cranbrook
Air	0 / -	0 / -	0 / -	0 / -	-
Biodiversity	0	0 / -	0 / -	0	0
Business Growth	0	0	0	0	0
Climate Change	0	? / -	? / -	0	0
Deprivation	0	0	0	0	0
Education	+	0	+	+	+
Employment	+	+	+	+	+
Equality	+	0 / +	+	+	-
Health	0	0 / +	0 / +	0	0
Heritage	-	- / - -	- -	-	0
Housing	+	+	+	+	0 / +
Land use	- / - -	- -	- -	- / - -	- / - -
Landscape	-	- / - -	- -	-	-
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	- - / ?	0 / ?	? / -
Services & Facilities	- / - -	- / - -	- / - -	- / - -	- - / - - -
Travel	-	-	-	-	- -
Waste	0	0	0	0	0
Water	0	0 / -	0 / -	0	0
Commentary	Reasonable site. There is a risk of adverse impacts upon the setting of the adjacent Conservation Area and thus the heritage objective scores negatively. Lack of services and facilities is a key issue for all development in this settlement.	A site that scores several neutrals with some positives, let down by its land use and landscape score impacted by loss of a greenfield site in the AONB and lack of services and facilities including public transport at the settlement	A site that scores some neutrals with some positives, which is let down by its land use and landscape score impacted by loss of a greenfield site in the AONB and impact on heritage with part of the site being within the Benenden Conservation Area and the site forming part of the setting to the Conservation Area and including part of the historic settlement. There is also a lack of services and facilities including public transport at the settlement	Reasonable site. Minor landscape and heritage issues due to the sensitive landscape and setting of heritage assets. Lack of services and facilities is a key issue for all development in this settlement.	A site that scores a number of neutrals and some positives. It is a greenfield site located in a remote location, reflected in the land use score. Landscape scores (albeit that the site is adjacent to existing built development at Benenden Hospital) negatively as it results in the loss of a greenfield site in an historic landscape that lies adjacent to historic routeways (roads). Residents will rely heavily on private cars and thus air, equality and travel objectives score negatively.

Sustainability Objective	Scores for Reasonable Sites in Benenden (part 2 of 2)			
	AS_8	AS_16	AS_21	AS_41
	Land south of Chapel Lane, Iden Green, Cranbrook	Uphill, New Pond Road, Benenden, Cranbrook	Little Weavers, Iden Green, Benenden, Cranbrook	Land at Benenden Hospital (including site 424 and AS_40))
Air	-	0 / -	-	-
Biodiversity	0	0	0	0 / +
Business Growth	0	0	0	0 / +
Climate Change	0	0	0	? / -
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	+	+	+
Equality	-	+	-	-
Health	0 / +	0	0 / +	0
Heritage	-	-	0	0
Housing	0 / +	+	0 / +	+
Land use	- / - -	- / - -	+	+
Landscape	-	-	+	0
Noise	0	0	0	0
Resources	0 / ?	?	- - / ?	- - / ?
Services & Facilities	- - / - - -	- / - -	- - -	- - / - - -
Travel	- -	-	- -	- -
Waste	0	0	0	0
Water	0	0	0	0
Commentary	<p>This site scores some neutrals and some positives. A number of scores are negative however, reflecting the remote location of the site from services and facilities and public transport. It scores negatively in heritage terms as the site is a relatively sizeable piece of the Iden Green Conservation Area. It scores negatively in land use and landscape terms, influenced by the loss of greenfield land within the AONB and adjacent to an historic settlement.</p>	<p>Reasonable site. Setting of adjacent Conservation Area needs consideration. Lack of services and facilities is a key issue for all development in this settlement.</p>	<p>Good use of previously developed land. However, residents will rely heavily on private cars and thus some objectives score negatively. This is influenced by the lack of key services and facilities and public transport options.</p>	<p>Good use of previously developed land resulting in a positive score for the land use objective. However, residents will rely heavily on private cars and thus air, equality and travel objectives score negatively. Although promoted by the policy, shared transport and active travel options are unlikely to take precedence over private vehicle use thus air quality and climate change also score negatively. The biodiversity objective scores positively due to the requirement for a long term management plan for the sensitive features on site.</p>

Appendix L - Brenchley and Matfield

Sustainability Objective	Scores for Reasonable Sites in Brenchley and Matfield (part 1 of 5)			
	18	18	34	36
	WHOLE SITE: Matfield House orchards and land, The Green, Matfield TN12 7JT	PART SITE: Matfield House orchards and land, The Green, Matfield TN12 7JT	Walters Farm, High Street, Brenchley TN12 7NU	Land fronting Maidstone Road and Chestnut Lane, Matfield
Air	0 / -	0 / -	0	0
Biodiversity	0	0	0	0
Business Growth	0	0	0	0
Climate Change	0	0	0	0
Deprivation	0	0	0	0
Education	0 / +	0 / +	0 / +	0 / +
Employment	+	+	+ / ?	+
Equality	0	0	0	0
Health	0	0	0	0
Heritage	-	0 / -	-	0 / -
Housing	+	0 / +	+	0 / +
Land use	--	--	--	- / --
Landscape	- / --	0 / -	- / --	- / --
Noise	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	- / --	- / --	-	- / --
Travel	0 / -	0 / -	-	0 / -
Waste	0	0	0	0
Water	0	0	0	0
Commentary	Negative land use score is created by the loss of Grade 2 BMV soils. The walking route to main facilities in Brenchley is not accessible (no pavement) and far beyond desirable walking distance (1.5km) so objectives that relate to dependency on private car use score negatively (e.g. air). This is to be expected in a rural settlement like Matfield. A negative heritage score reflects the development being out of keeping with the existing linear settlement pattern and potential adverse effects on the setting of the adjacent Conservation Area, and setting of the settlement also reflected in the negative landscape score.	Negative land use score is created by the loss of Grade 2 BMV soils. The walking route to main facilities in Brenchley is not accessible (no pavement) and far beyond desirable walking distance (1.5km) so objectives that relate to dependency on private car use score negative (e.g. air). This is to be expected in a rural settlement like Matfield. A negative heritage score reflect the development being slightly out of keeping with the existing linear settlement pattern and potential adverse effects on the setting of the adjacent Conservation Area.	A site that scores mostly neutral and some positive scores. It is let down by a lack of key services and facilities. Negative scores are given on land use grounds, influenced by the loss of a greenfield site in an historic landscape in the AONB. It scores a negative landscape score due to potential impact on the setting of the historic settlement.	Site scores negatively reflecting largely wooded nature on scores relating to biodiversity, land use and landscape and potential harm arising from this loss on the historic settlement and the AONB. The walking route to main facilities in Brenchley is not accessible (no pavement) and far beyond desirable walking distance (1.5km) so objectives that relate to dependency on private car use score negatively (e.g. air). This is to be expected in a rural settlement like Matfield. A slightly negative score for biodiversity reflects the likelihood that the site is currently suitable habitat for wildlife and that protected species such as reptiles may need to be translocated (surveys will confirm). The site also scores several neutrals and some positives.

Sustainability Objective	Scores for Reasonable Sites in Brenchley and Matfield (part 2 of 5)			
	76	80	215	220
	Corsica Nursery, Brenchley Road, Matfield TN12 7PT	Parsonage Farm, Brenchley Road, Brenchley TN12 7PA	Land at Horsmonden Road, adjacent to Church Close, Brenchley	Thorn Barn, Maidstone Road, Standings Cross, Matfield
Air	0 / -	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0
Business Growth	0	0 / ?	0	0
Climate Change	0	0	0	0
Deprivation	0	0	0	0
Education	0 / +	0 / +	0 / +	0 / +
Employment	+	0 / +	+	+
Equality	0	0	0 / -	0
Health	0	0	0	0
Heritage	0	--	-	0
Housing	0	+ / + +	+	0
Land use	0 / -	--	--	0 / -
Landscape	0 / -	- / --	--	- / --
Noise	0	0	0	0
Resources	? / -	? / -	0 / ?	? / -
Services & Facilities	- / --	-	-	- / --
Travel	0 / -	-	-	0 / -
Waste	0	0	0	0
Water	0	0	0	0
Commentary	A site that scores several neutral scores as well as positive ones. It is a small site which would have limited impact on landscape, reflected in the score given. Its land use negative score is influenced by the grade 2 agricultural soil, though this site is small so the loss of this site would not be significant given site context. It is let down by a lack of key services and facilities and public transport options.	Site scores positively for housing but is let down by landscape and land use impacts and its score for heritage impact which reflects impact on AONB component parts and on setting of the settlement.	Site scores some neutrals and some positives but is let down on a number of scores. It forms part of the landscape setting of Brenchley, a historic settlement which adjoins the site. There would be a loss of a greenfield site in the AONB. There is concern that topography on the site would restrict access to the services at Brenchley for the less able. These factors contribute to some of the negative scores along with a lack of key services and facilities and public transport options.	A site that scores several neutrals. Part of the site is an historic field, and the site is adjacent to historic routeways, both factors influencing the landscape score. The greenfield nature of part of the site and its grade 2 agriculture land classification has informed land use score. The site is let down by a lack of key services and facilities and public transport options in Matfield.

Sustainability Objective	Scores for Reasonable Sites in Brenchley and Matfield (part 3 of 5)				
	288	353	393	401	403
	Land lying on the west side of Maidstone Road, Matfield, Tonbridge	Ashes Plantation, Maidstone Road, Matfield	Town Farm, Palmers Green Lane, Brenchley, Tonbridge	Land at Maidstone Road, Matfield,	Land at Oakfield Road, Matfield
Air	0 / -	0 / -	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	0	0	0
Deprivation	0	0	0	0	0
Education	0 / +	0 / +	0 / +	0 / +	0 / +
Employment	+	+	+	+	+
Equality	0	0	0 / -	0	0
Health	0	0	0	0	0
Heritage	0	-	-	0 / -	0 / -
Housing	0 / +	0 / +	+	0 / +	0 / +
Land use	--	--	--	--	- / --
Landscape	-	-	--	0 / -	-
Noise	0	0	0	0	0
Resources	0 / ?	?	0 / ?	0 / ?	?
Services & Facilities	- / --	- / --	-	- / --	- / --
Travel	0 / -	0 / -	-	0 / -	0 / -
Waste	0	0	0	0	0
Water	0	0	0	0	0
Commentary	A site that scores several neutrals but which is let down by its location further from services and facilities than some other sites and a lack of public transport options. Its negative land use score is influenced by the fact this is grade 2 agricultural land and the site is a greenfield site. The greenfield site has also informed the landscape score along with historic routeways through and adjacent to the site.	Negative land use score is created by the loss of Grade 2 BMV soils. The walking route to main facilities in Brenchley is not accessible (no pavement) and far beyond desirable walking distance (1.5km) so objectives that relate to dependency on private car use score negatively (e.g. air). This is to be expected in a rural settlement like Matfield. A negative landscape and heritage score reflect the development not being in keeping with the existing linear settlement pattern within the AONB. However, the screening of the sites by trees reduces impacts.	Site scores some neutrals and some positives but is let down on a number of scores. It adjoins the historic settlement and is important to the setting of this and the landscape setting generally. There would be a loss of a greenfield site in the AONB, the site is partly an historic field, and there are historic routeways (PROW) on the site. There is concern that topography on the site would restrict access to the services at Brenchley for the less able. These factors contribute to some of the negative scores along with a lack of key services and facilities and public transport options.	Negative land use score is created by the loss of Grade 2 BMV soils. The walking route to main facilities in Brenchley is not accessible (no pavement) and far beyond desirable walking distance (1.5km) so objectives that relate to dependency on private car use score negatively (e.g. air). This is to be expected in a rural settlement like Matfield. A negative heritage score reflects potential adverse effects on the setting of the adjacent Conservation Area.	Site scores several neutrals with negative scores reflecting loss of a greenfield site in the AONB. However, the screening of the site by trees reduces impacts. The walking route to main facilities in Brenchley is far beyond desirable walking distance so objectives that relate to dependency on private car use score negatively (e.g. air). This is to be expected in a rural settlement like Matfield.

Sustainability Objective	Scores for Reasonable Sites in Brenchley and Matfield (part 4 of 5)			
	406	410	414	417
	Land at Glebe House, Brenchley Road, Brenchley	Land at Brenchley Road, Matfield	Land north-east of Maidstone Road, Matfield	Land to the East of Horsmonden Road, Brenchley
Air	0 / -	- -	0 / -	0 / -
Biodiversity	0	0 / -	0	0
Business Growth	0	0	0	0
Climate Change	0	? / -	0	0
Deprivation	0	0	0	0
Education	0 / +	0 / -	0 / +	0 / +
Employment	+	+	+	+
Equality	0	0 / ?	0	0 / -
Health	0	0	0	0
Heritage	- -	- -	-	-
Housing	+	+ / + +	0 / +	+
Land use	-	- -	- -	- -
Landscape	-	- - -	-	- -
Noise	0	0	0	0
Resources	? / -	?	?	0 / ?
Services & Facilities	-	- / - -	- / - -	-
Travel	-	-	0 / -	-
Waste	0	0	0	0
Water	0	0 / -	0	0
Commentary	A reasonably located site that scores a number of neutrals and positive scores. It is let down by a lack of key services and facilities and public transport and on its heritage score because of its location within the Brenchley Conservation Area and adjacent to an historic farmstead. There is a small amount of archaeological potential on the site which is located in the AONB and adjoined by an historic routeway (road) and there is an historic routeway (PROW) to the west of the site.	Site scores some neutrals and some positives but scores negatively on heritage, land use and landscape scores due to its forming a significant part of the historic and landscape setting of the Matfield and the Conservation Area, as well as the loss of historic fields in the AONB and being greenfield land. Negative score is influenced by the loss on part of the site of Grade 2 BMV soils. The walking route to main facilities in Brenchley is not accessible far beyond desirable walking distance so objectives that relate to dependency on private car use score negatively (e.g. air). This is to be expected in a rural settlement like Matfield.	Negative land use score is created by the loss of Grade 2 BMV soils. The walking route to main facilities in Brenchley is not accessible (no pavement) and far beyond desirable walking distance (1.5km) so objectives that relate to dependency on private car use score negatively (e.g. air). This is to be expected in a rural settlement like Matfield. A negative landscape and heritage score reflect the development not being in keeping with the existing linear settlement pattern within the AONB. However, the screening of the sites by trees reduces impacts.	Site scores some neutrals and some positives but is let down on a number of scores. It abuts the Brenchley Conservation Area and the listed church to the north west and is important to the setting of these as well as the landscape setting of Brenchley. There is an historic farmstead to the south west. There would be a loss of a greenfield site in the AONB, the site is an historic field, and there are historic routeways (PROW) crossing on the site and historic routeway (road) adjacent. There is concern that topography on the site would restrict access to the services at Brenchley for the less able as there is also a lack of pavement along Horsmonden Road. These factors contribute to some of the negative scores along with a lack of key services and facilities and public transport options.

Sustainability Objective	Scores for Reasonable Sites in Brenchley and Matfield (part 5 of 5)				
	AS_7	AS_27	AS_33	AS_46	AS_47
	Land at Little Puxted, High Street, Brenchley, Tonbridge	Land between Brenchley Road, Coppers Lane and Maidstone Road, Matfield	Land at Brenchley Primary School and land south of Brenchley Road (including sites 103 and late sites 34 and 35)	Land off Maidstone Road Matfield	Land at Friars, Matfield
Air	0 / -	0 / -	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	0	0	0
Deprivation	0	0	0	0	0
Education	0 / +	0 / +	0 / +	0 / +	0 / +
Employment	+	+	+	+	+
Equality	0 / -	0	0	+	+
Health	0	0	0	0	0
Heritage	-	-	0 / -	-	-
Housing	0 / +	0 / +	+	0 / +	0 / +
Land use	--	--	--	--	--
Landscape	-- / ---	- / --	0 / -	-	-
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	? / -	0 / ?	0 / ?
Services & Facilities	-	- / --	-	- / --	- / --
Travel	-	0 / -	-	0 / -	0 / -
Waste	0	0	0	0	0
Water	0	0	0	0	0
Commentary	A site that is let down by scores relating to heritage, land use and landscape impact. The site is an historic field, which impacts on this AONB component part. Site also let down by accessibility to key services and facilities.	Negative land use score is created by the loss of Grade 2 BMV soils. The walking route to main facilities in Brenchley is not accessible (no pavement) and far beyond desirable walking distance (1.5km) so objectives that relate to dependency on private car use score negatively (e.g. air). This is to be expected in a rural settlement like Matfield. Negative heritage and landscape scores reflect the development not being in keeping with the existing linear settlement pattern and the loss of a historic field within the AONB.	The positive score for housing indicates the suitability of the location for older persons (i.e. near to facilities). However, the site is still outside of desirable walking distances so objectives related to dependency on private car use score negatively. In particular, travel to Paddock Wood to access the train line is inconvenient from Brenchley.	A site that scores many neutrals but which is let down by it location further from services and facilities than some other sites. Negative score for land use is influenced by grade 2 agricultural land.	A site that scores many neutrals but which is let down by it location further from services and facilities than some other sites. Negative score for land use is influenced by grade 2 agricultural land.

Appendix M - Frittenden

Sustainability Objective	Scores for Reasonable Sites in Frittenden		
	224	349	AS_28
	The Old Rectory, The Street/Mill Lane, Frittenden, TN17 2DG	Pound Hill Field, Biddenden Road, Frittenden	Land at Cranbrook Road, Frittenden
Air	0	0 / -	0 / -
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	0 / -	0 / -	0 / -
Employment	+	+	+
Equality	-	-	-
Health	0 / +	0 / +	0
Heritage	0	-	-
Housing	0 / +	+	+
Land use	-	-	-
Landscape	0 / -	0 / -	0 / -
Noise	0	0	0
Resources	0 / ?	0 / ?	0 / ?
Services & Facilities	-- / ---	-- / ---	-- / ---
Travel	- / --	- / --	- / --
Waste	0	0	0
Water	0	0 / +	0 / +
Commentary	Mostly neutral scores with some positive sustainability criteria identified. However, lack of public transport and a limited range of services is a large detractor for this site.	This site scores many neutrals and there are some positive sustainability criteria identified. However, lack of public transport and a limited range of services is a large detractor for this site.	Some positive sustainability criteria identified. However, lack of public transport and a limited range of services is a large detractor for this site. This site would also benefit from an open space buffer.

Appendix N - Goudhurst

Sustainability Objective	Scores for Reasonable Sites in Goudhurst				
	83	124	174	370	415
	Land to the west of Balcombes Hill, Goudhurst, TN17 1AT	Land east of Balcombes Hill and adjacent to Maypole Lane, Goudhurst, TN17 1AE	Land north of Triggs Farm and west of Paynetts Farm, Cranbrook Road, Goudhurst	Land adjacent to Beechurst and Jarvis Lane, Goudhurst	Land off Ladham Lane, Goudhurst
Air	0	0	0	0	0
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	0	0	0
Deprivation	0	0	0	0	0
Education	0 / -	0 / -	0 / -	0 / -	0 / -
Employment	+	+	+	+	+
Equality	+ / ?	+ / ?	0	-	-
Health	0	0	0	0	0
Heritage	0	0	0	0	0 / -
Housing	+ / ?	+ / ?	0 / +	0 / +	0 / +
Land use	-	-	-	-	-
Landscape	-	0 / -	0 / -	- / - -	- -
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	- -	- -	- -	- -	- -
Travel	0 / -	0 / -	0 / -	0 / -	0 / -
Waste	0	0	0	0	0
Water	0	0	0 / +	0 / +	0 / +
Commentary	A site with several neutral scores and some positive. The site is let down on grounds relating to both land use and landscape impact, being the loss of a greenfield site in the AONB adjacent to an historic settlement.	Reasonable site with many largely neutral scores. Slight negative scores mostly reflect dependency on private car use.	Reasonable site with many neutral or slightly positive scores. Slight negative scores mostly reflect dependency on private car use.	This site is remote from most key services and facilities located further west from the centre of Goudhurst. It scores mostly neutrals with some positive scores but is let down on landscape grounds, being the loss of a greenfield in the AONB adjacent to an historic settlement and its location relative to services and facilities.	This site is remote from most key services and facilities located further west from the centre of Goudhurst. It scores neutrals with some positive scores but is let down on landscape grounds, being the loss of an historic field in the AONB and is adjacent to an historic routeway (road).

Appendix O - Horsmonden

Sustainability Objective	Scores for Reasonable Sites in Horsmonden (part 1 of 3)				
	31	63	82	93	96
	Land adjacent to Furnace Lane and Gibbett Lane, Horsmonden	Land west of Maidstone Road and north of Kirkins Close, Horsmonden	Land adjacent to Bassetts Farm Goudhurst Road, Horsmonden TN12 8AS (includes sites 108 , 297 and 324)	Upper Haymans Farm, Land to the east of Maidstone Road, Horsmonden	Land on the north west side of Maidstone Road at Church Meadow, Horsmonden
Air	0 / -	0	0 / -	-	-
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	? / - -	0	0
Deprivation	0	0	0	0	0
Education	+	+	+	+	+
Employment	+	+	+	+	+
Equality	+	+	+	0 / -	+
Health	0	0	0	0	0
Heritage	0	0	-	- / - -	- / - -
Housing	+	+	++	+	+
Land use	- -	-	- -	-	-
Landscape	0 / -	0	-	- / - -	- / - -
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	- -	- -	- -	- -	- -
Travel	-	0 / -	-	- / - -	- / - -
Waste	0	0	0	0	0
Water	0	0 / +	0 / -	0	0
Commentary	A site that scores mostly neutral scores. It scores negatively for land use reflecting the loss of a greenfield site and associate soils. The landscape negative score is influenced by the loss of the greenfield site in an historic landscape.	A site that scores mostly neutral scores. Poor services and facilities let down this site.	Scale of this site is out of keeping with the existing settlement and causes negative scores for landscape and heritage. Existing public transport services are unlikely to deter travel by private car and the poor range of services and facilities contributes to this effect. However, the site would contribute positive to the housing objective and the existing schools are likely to have adequate capacity.	This site scores some neutrals and some positives but is let down by its location detached from the main services and facilities of the settlement and a lack of key services and facilities generally, landscape and land use impact and lack of travel options. It is likely that any occupants of this site would be car dependant.	This site scores some neutrals and some positives but is let down by its location detached from the main services and facilities of the settlement and a lack of key services and facilities generally, landscape and land use impact and lack of travel options. It is likely that any occupants of this site would be car dependant.

Sustainability Objective	Scores for Reasonable Sites in Horsmonden (part 2 of 3)				
	97	162	207	321	322
	Land on the north west side of Maidstone Road and to the south east of Swigs Hole Farm, Horsmonden	Land south of Brenchley Road, Horsmonden	Land to the rear of Kirkins Close and Willard Place, Horsmonden	Cottage Paddock, The Cottage, Brenchley Road, Horsmonden	Milestone Paddock, Milestone Cottages, Brenchley Road, Horsmonden
Air	-	0 / -	0 / -	0	0
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	? / -	0	0	0
Deprivation	0	0	0	0	0
Education	+	+	+	+	+
Employment	+	+	+	+	+
Equality	0 / -	+	+	+	+
Health	0	0	0	0	0
Heritage	- / - -	-	-	0	-
Housing	0 / +	+ / + +	+	+	+
Land use	-	-	- / - -	0	0
Landscape	- / - -	-	-	0 / -	0 / -
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	? / -	? / -
Services & Facilities	- -	- -	- -	- -	- -
Travel	- / - -	-	-	-	-
Waste	0	0	0	0	0
Water	0	0	0	0	0
Commentary	This site scores some neutrals and some positives but is let down by its location detached from the main services and facilities of the settlement and a lack of key services and facilities generally, landscape and land use impact and lack of travel options. It is likely that any occupants of this site would be car dependant.	This site scores a mix of neutrals and positives. Negative scores received reflect the lack of key services and facilities at Horsmonden and a lack of public transport options. It is a relatively large site so the housing objective scores positively.	A site that scores both neutral and positive scores. It scores negatively for land use reflecting the loss of a greenfield site and a site that includes grade 2 agricultural land. The landscape negative score is influenced by the loss of the greenfield site in an historic landscape.	This site scores a mix of neutrals and positives. Negative scores received reflect the lack of key services and facilities at Horsmonden and a lack of public transport options. A large pond on the site informs the biodiversity score given.	This site scores a mix of neutrals and positives. Negative scores received reflect the lack of key services and facilities at Horsmonden and a lack of public transport options. There is a listed building on the site, the likely impact upon which influences the heritage score given.

Sustainability Objective	Scores for Reasonable Sites in Horsmonden (part 3 of 3)				
	324	355	377	378	AS_42
	Land at Bramley Cottage, Back Lane, Horsmonden	Land adjacent to Goudhurst Road, Horsmonden	Land to the north of Brenchley Road, Horsmonden	Land to the east of Furnace Lane and Gibbet Lane, Horsmonden	Land adjacent to Apple Tree Cottage, Horsmonden
Air	0	0	-	0 / -	0
Biodiversity	0	0	0 / -	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	? / -	- / ?	0
Deprivation	0	0	0	0	0
Education	+	+	+	+	+
Employment	+	+	+	+	+
Equality	0 / +	+	+	+	0
Health	0	0	0	0	0
Heritage	0	0	- / - -	-	- -
Housing	+	+	+ / + +	+ + +	+
Land use	-	-	- / - -	- / - -	-
Landscape	-	-	- -	- -	-
Noise	0	0	0	0	0
Resources	0 / ?	? / -	0 / ?	0 / ?	0 / ?
Services & Facilities	- -	- -	- -	- -	- -
Travel	-	-	-	-	-
Waste	0	0	0	0	0
Water	0	0	0	0	0
Commentary	A site that scores several neutral and positive scores which is let down by the loss of a greenfield site and concerns over potential vehicular access to the site via Back Lane, and a lack of key services and facilities at Horsmonden and public transport options.	A reasonable site let down by a lack of key services and facilities and public transport options as well as the loss of a greenfield site in an historic landscape. There is significant concern about the ability to provide an appropriate means of vehicular access to serve the site.	A site which scores some neutrals and some positives. It is let down by a lack of key services and facilities and a lack of public travel options. It scores negatively for biodiversity influenced by location of site adjacent to a National Nature Reserve, and for land use as a result of this being a greenfield site that contains a significant proportion of grade 2 agricultural land as well as grade 3. Landscape also scores negatively being the loss of a greenfield site adjacent to the AONB in an historic landscape.	A site which scores some neutrals and some positives. It is let down by a lack of key services and facilities and a lack of public travel options. It scores negatively for land use as a result of this being a greenfield site that contains grade 2 agricultural land as well as grade 3. Landscape also scores negatively being the loss of a greenfield site in an historic landscape.	This site scores mostly neutral with some benefit to housing provision. It scores negatively in land use terms and for heritage, as almost all of the site has archaeological potential.

Appendix P - Lamberhurst

Sustainability Objective	Scores for Reasonable Sites in Lamberhurst (part 1 of 2)				
	1	74	170	279	285
	Car park for former Slaughterhouse, adjacent to Brewers Street/Hopgarden Close, Lamberhurst	Land east of Spray Hill, Pearse Place, Lamberhurst TN3 8EJ	Land at Spray Hill, Lamberhurst	The ex-vineyard land, Lamberhurst	Misty Meadow, Furnace Lane, Lamberhurst
Air	0 / -	0 / -	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	0	0	0	0
Deprivation	0	0	0	0	0
Education	+	+	+	+	+
Employment	+	+	+	+	+
Equality	0	0	0	0	0
Health	0 / +	0	0	0 / +	0
Heritage	0	0	0	0	0
Housing	+	+	+	+	+
Land use	0 / -	-	-	-	-
Landscape	0 / -	-	-	-	-
Noise	0	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	?	?
Services & Facilities	-	-	-	-	- / - -
Travel	-	-	-	-	-
Waste	0	0	0	0	0
Water	0 / -			0 / +	0
Commentary	A site that scores several neutrals with some positive scores. It is let down by a lack of key services and options for public transport.	A site that scores several neutral scores and positive scores. This site is let down on the scores for land use and landscape being the loss of a greenfield site in the AONB adjacent to an historic settlement and it scores negatively in terms of services and facilities as well as travel, influenced by a lack of key services and facilities in the settlement and lack of public transport.	A site that scores several neutral scores and positive scores. This site is let down on the scores for land use and landscape being the loss of a greenfield site in the AONB adjacent to an historic settlement and it scores negatively in terms of services and facilities as well as travel, influenced by a lack of key services and facilities in the settlement and lack of public transport.	Some positive criteria identified including improved access to heritage asset and safeguarding land for the school. However, site is not well located for easy access to services and travel options are limited. Groundwater source protection zone also requires consideration.	Reasonable site with many largely neutral scores. Slight negative scores mostly reflect dependency on private car use.

Sustainability Objective	Scores for Reasonable Sites in Lamberhurst (part 2 of 2)		
	363	423	AS_36
	Land at 36 Brewer Street, Lamberhurst	Lamberhurst Winery, Lamberhurst Down, Lamberhurst	Land at Whisketts Farm, Lamberhurst, TN3 8JG
Air	0 / -	0 / -	-
Biodiversity	0	0	0 / -
Business Growth	0	0	0
Climate Change	0	0	0 / -
Deprivation	0	0	0
Education	+	+	0
Employment	+	+	+
Equality	0	0	0
Health	0 / +	0	0 / +
Heritage	0	--	0
Housing	+	+	++
Land use	0 / -	-	-
Landscape	0 / -	--	- / --
Noise	0	0	0 / -
Resources	? / -	0 / ?	0 / ?
Services & Facilities	-	-	- / --
Travel	-	-	- / --
Waste	0	0	0
Water	0	0	
Commentary	A site that scores many neutrals with some positive scores. It is let down by a lack of key services and facilities and public travel options.	A site that scores mostly neutral scores with some positive ones. It is let down by a lack of key services and facilities and public travel options and concerns regarding impact on heritage and landscape informed by location adjacent to Lamberhurst historic settlement and a loss some greenfield land in the AONB.	This site scores some neutrals and some positive scores. It scores a number of negatives, which reflect the loss of an historic field in the AONB adjacent to an historic settlement. It has a poor air quality score and services, facilities and travel options influenced by the location of the site relative to the settlement centre and the lack of key services and facilities and public transport available.

Appendix Q - Pembury

Sustainability Objective	Scores for Reasonable Sites in Pembury (part 1 of 5)				
	28	44	50	64	189
	Land at Woodside Road, Pembury TN2 4BG	Land rear of High Street and west of Chalket Lane (including site 67, 368, 369 & late site 5)	50A Hubbles Farm and 32 Hastings Road (including adjacent land), TN2 4JP (including 390)	Land at Woodside House, Woodside Road TN2 4BG	Land south of Hastings Road, Pembury
Air	0	0	0	0	0
Biodiversity	0	0	0	0	0
Business Growth	0	0	0	0	0
Climate Change	0	? / -	? / -	0	? / -
Deprivation	0	0	0	0	0
Education	+	+	+	+	+
Employment	+	+	+	+	+
Equality	0	+	+	0	+
Health	0	0	0	0	0
Heritage	0 / -	-	-	0 / -	0 / -
Housing	0 / +	+ / ++	+ / ++	0 / +	+ / ++
Land use	- / --	- / --	- / --	- / --	- / --
Landscape	-	-	-	--	- / --
Noise	0	-	-	0	-
Resources	0 / ?	- / ?	- / ?	? / -	0 / ?
Services & Facilities	0 / -	0 / -	0 / -	0 / -	0 / -
Travel	0 / -	0	0	0 / -	0
Waste	0	0	0	0	0
Water	0 / -	0	0 / -	0 / -	0 / -
Commentary	A site that scores mostly neutrals, which is let down on land use and landscape grounds and its location relative to key services and facilities and public transport options. It results in the loss of a greenfield site in the AONB, an historic landscape and is part of a Green Belt parcel the release from which would cause high harm.	Negative land use score is influenced by the loss of Green Belt (low harm) greenfield land, with grade 3 soils in the AONB. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.	Negative land use score is influenced by the loss of Green Belt (low harm) greenfield land, with grade 3 soils in the AONB. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels. Risk to Groundwater Source Protection Zone is influencing the score for the water objective.	A site that scores mostly neutrals, which is let down on land use and landscape grounds and its location relative to key services and facilities and public transport options. It results in the loss of an historic greenfield site in the AONB, an historic landscape and is part of a Green Belt parcel the release from which would cause high harm.	Negative land use score is influenced by the loss of Green Belt (low harm) greenfield land, with grade 3 soils in the AONB. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels. Risk to Groundwater Source Protection Zone is influencing the score for the water objective. Loss of the historic fields AONB feature caused the landscape and heritage objectives to be negative.

Sustainability Objective	Scores for Reasonable Sites in Pembury (part 2 of 5)			
	190	191	208	241
	Land south east of Sandhurst Avenue, Pembury	Land north of Henwoods Mount, Pembury	Romford House Farm, Kings Toll Road, Pembury, TN2 4BE	Land south of Sandhurst Avenue and east of Woodside Road, Pembury
Air	0	0	0	0
Biodiversity	0	0	0	0
Business Growth	0	0	0	0
Climate Change	? / -	? / -	? / -	? / -
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	+	+	+
Equality	+	+	0	+
Health	0	0	0 / +	0
Heritage	0 / -	0 / -	-	0 / -
Housing	+ / ++	+ / ++	+ / ++	+ / ++
Land use	-- / ---	--	--	--
Landscape	- / --	-	- / --	- / --
Noise	-	-	-	-
Resources	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	0 / -	0 / -	0 / -	0 / -
Travel	0	0	0	0
Waste	0	0	0	0
Water	0 / -	0 / -	0 / -	0 / -
Commentary	Negative land use score is influenced by the loss of Green Belt (moderate/high) greenfield land, with grade 3 soils in the AONB. Landscape scores negative because of location of site relative to historic fields and historic farmsteads within an historic landscape in the AONB. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.	Negative land use score is influenced by the loss of Green Belt (high) greenfield land, with part grade 3 soils in the AONB. The site is also an historic field. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.	Negative land use score is influenced by the loss of Green Belt (moderate) greenfield land. The site is also an historic field located within the AONB. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.	Negative land use score is influenced by the loss of Green Belt (moderate/high) greenfield land, including grade 3 soils in the AONB and part historic field. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.

Sustainability Objective	Scores for Reasonable Sites in Pembury (part 3 of 5)			
	282	290	332	354
	Romford House Kings Toll Road, Pembury	Abbots, Woodside Close, Pembury	Priory Farm, Romford Road, Pembury	Stone Court Farm, Stone Court Lane, Pembury
Air	0	0	0 / -	0 / -
Biodiversity	0	0	0	0
Business Growth	0	0	0 / ?	0
Climate Change	? / -	? / -	0	0
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	+	+	+
Equality	0	0	0 / -	0 / +
Health	0 / +	0	0	0
Heritage	-	0	0	0
Housing	+ / + +	0 / +	0 / +	0 / +
Land use	- -	- / - -	- -	- -
Landscape	- / - -	0 / -	- -	-
Noise	-	0	0	0
Resources	0 / ?	? / -	? / -	0 / -
Services & Facilities	0 / -	0 / -	0 / -	0 / -
Travel	0	0	-	-
Waste	0	0	0	0
Water	0 / -	0 / -	0 / -	0 / -
Commentary	Negative land use score is influenced by the loss of Green Belt (moderate) greenfield land, The site is also an historic field located within the AONB. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.	A site that scores mostly neutrals, which scores positive for housing provision, let down on land use by impact on the Green Belt (moderate) and its location relative to key services and facilities. Land use score is also informed by grade 2 agricultural soils.	Negative land use score is influenced by the loss of Green Belt (high harm and very high harm) and greenfield land, with grade 3 soils in an historic landscape in the AONB. Housing in this location would not suit older people (distant from services). Air quality scores negatively largely due to the distance to local services.	Negative land use score is influenced by the loss of Green Belt (high harm) and part greenfield land in an historic landscape (not in but adjacent to AONB), with grade 2 agricultural soils. Air quality scores negatively largely due to the distance to local facilities and good local road network meaning private car use will be preferred. Stone court Farm Lane will not be user friendly for those with mobility problems.

Sustainability Objective	Scores for Reasonable Sites in Pembury (part 4 of 5)			
	367	373	375	379
	Land to the southwest of Woodside House, Woodside Road, Pembury	Land at Downingbury Farm, Pembury	Land at Dowingbury Farm, Rowley Hill, Pembury	WHOLE SITE: Land at Henwood Green Road, Pembury and Land at Sturgeons fronting Henwood Green Road
Air	0	0 / -	0 / -	0
Biodiversity	0 / -	0	0	0
Business Growth	0	0 / +	+	0
Climate Change	0	? / - -	? / -	? / -
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	? / -	++	+
Equality	0	0 / +	0 / +	0 / +
Health	0	0 / +	0 / +	0
Heritage	0 / -	--	-	-
Housing	0 / +	0 / +	0 / +	0 / +
Land use	- / - -	- / - -	- / - -	- -
Landscape	--	- / - -	-	- -
Noise	0	-	0 / -	0
Resources	? / -	? / -	0 / ?	- / ?
Services & Facilities	0 / -	0 / -	0 / -	0 / -
Travel	0 / -	-	-	-
Waste	0	0	0	0
Water	0 / -	0 / -	0 / -	0 / -
Commentary	A site that scores mostly neutrals, which is let down on land use and landscape grounds, containing a significant chunk of Ancient Woodland in the AONB, and its location relative to key services and facilities. Land use score influenced by grade 3 agricultural soils and location in Green Belt parcel PE3 (high harm), adjusted to reflect that site is part of this wider parcel.	Site scores a number of neutrals and some positives. Its location adjacent to the A228 influences the air quality and noise scores given. The site forms part of the setting of an historic farmstead which has influenced the heritage score given as well as being adjacent to listed buildings. The site is parcel PE5 (moderate harm) if released from the Green Belt which along with grade 3 agricultural soils and greenfield nature of the site has informed the land use score. The negative landscape score reflects the loss of a greenfield site in the AONB, and existence of the historic farmstead as well as historic routeways.	The A21 corridor has been identified as an area for employment growth and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Negative land use score is influenced by the loss of Green Belt (moderate harm) and greenfield land, with grade 3 soils in the AONB. The health objective scores slightly positive because of the proposal to safeguard land for hospice expansion. Air quality scores negatively largely due to the distance to local facilities and good local road network meaning private car use will be preferred.	Negative land use score is influenced by the loss of Green Belt (high harm) and greenfield land, with grade 3 soils in the AONB. Housing in this location would not suit older persons (distant from services) so the housing objective does not score as high as it could.

Sustainability Objective	Scores for Reasonable Sites in Pembury (part 4 of 5)			
	379	395	444	444
	PART SITE: Land at Henwood Green Road, & Land at Sturgeons fronting Henwood Green Rd	Woodsgate Corner, Pembury,	WHOLE SITE: Land north of Tunbridge Wells Hospital, Tonbridge Rd (including site 136, late site 13 and other land)	PART SITE: Land north of Tunbridge Wells Hospital, Tonbridge Rd
Air	0	0	-	-
Biodiversity	0	0	-	-
Business Growth	0 / -	0 / +	+ / ++	+ / ++
Climate Change	0	0	? / -	? / -
Deprivation	0	0	0 / +	0 / +
Education	+	0	+	+
Employment	+	+	++	++
Equality	0 / +	0	+	+
Health	0	0	+	+
Heritage	0 / -	0	-	-
Housing	0 / +	0	+	+
Land use	0 / +	-	- / --	- / --
Landscape	0 / -	0	--	--
Noise	0	0	-	-
Resources	- / ?	?	?	?
Services & Facilities	0 / -	0	0 / -	0 / -
Travel	-	0	0 / -	0 / -
Waste	0	0	0	0
Water	0	0	-	0 / -
Commentary	Positive land use score is influenced by the development on brownfield land with no loss of soils. Housing in this location would not suit older persons (distant from services) so the housing objective does not score as high as it could.	The A21 corridor has been identified as an area for employment growth and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. However, the Business Growth and Employment objectives do not score as highly as they could because of the loss of the existing use as a supermarket. Negative land use score is influenced by the loss of Green Belt (low harm) and partial loss of greenfield land.	Education scores positively as this policy includes the provision of a medical education facility. Deprivation scores positively due to the provision of housing for key workers. The A21 corridor has been identified as an area for employment growth and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Negative land use score is influenced by the loss of Green Belt (moderate harm) and partial loss of greenfield land. The health objective scores positively to reflect the benefits that will be seen from a hospital increasing and improving hospital facilities. The nature of the proposed used will mean that bus and private car travel will be preferred to active travel modes. This and the risk of exposing sensitive receptors to increased levels of air pollutants, are the key reasons why the air objective is scored negatively. The proposals pose a risk to the multiple designated wildlife sites contained within the site. However, buffers and schemes for enhancements will reduce biodiversity impacts. Education scores positively as this policy includes the provision of a medical education facility. Deprivation scores positively due to the provision of housing for key workers. The A21 corridor has been identified as an area for employment growth and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Negative land use score is influenced by the loss of Green Belt (moderate harm) and partial loss of greenfield land. The health objective scores positively to reflect the benefits that will be seen from a hospital increasing and improving hospital facilities. The nature of the proposed used will mean that bus and private car travel will be preferred to active travel modes.	

Appendix R - Rusthall

Sustainability Objective	Scores for Reasonable Sites in Rusthall			
	22	60	EA_83	146
	Dingley Dell, Langton Road, Tunbridge Wells TN4 8XG	The Paddocks, Home Farm, 92 Lower Green Road, Rusthall TN4 8TT	Lifestyle Motor Europe, Langton Road	Tunbridge Wells Golf Club, Langton Road, Tunbridge Wells TN4 8XH
Air	0	0	0	-
Biodiversity	-	0	0 / -	- / - -
Business Growth	0	0	0	0
Climate Change	0	0	0	-
Deprivation	0	0	0	0
Education	0 / +	0 / +	0 / +	0 / -
Employment	+	+	+	+
Equality	+	+	+	+
Health	0	0	0	0
Heritage	-	-	0 / -	-
Housing	+	+	0 / +	++
Land use	- / - -	- -	0 / +	- -
Landscape	0 / -	0 / -	0	- / - -
Noise	- / - -	-	- / - -	- / - -
Resources	? / -	? / -	?	?
Services & Facilities	+	0 / -	+	+
Travel	0	0	0	0
Waste	0	0	0	0
Water	0	0	0	0 / -
Commentary	<p>This site has mixed scores. Negative score for noise because the site is within the main Gatwick flight path and will result in an increase of vehicle movements onto a road that already experiences high levels of road noise. It scores negatively for biodiversity because the site is adjacent to a Local Wildlife Site. A negative land use score is given as the site is part of a broader parcel of Green Belt assessed as having very high harm if released.</p>	<p>A reasonably well located site adjacent to the settlement, which has a limited range of key services and facilities. This site is let down by impact on the Green Belt, being a greenfield site within a Green Belt parcel which would have moderate harm if released from the Green Belt, informing the land use score.</p>	<p>This site is largely sustainable. Negative score is applied for noise because the site is within the main Gatwick flight path and will result in an increase of vehicle movements onto a road that already experiences high levels of road noise.</p>	<p>This site has mixed scores. Negative score for noise because the site is within the main Gatwick flight path and will result in a large increase of vehicle movements onto a road that already experiences high levels of road noise. Negative land use and landscape scores reflect the loss of greenfield land with complex topography which is classified as very high value Green Belt. Air quality is scored as negative overall as it was felt that the negative aspects of increased car travel could not be offset by the contributions gained for active travel improvements.</p>

Appendix S - Sandhurst

Sustainability Objective	Scores for Reasonable Sites in Sandhurst (part 1 of 2)			
	147	153	227 and 149	227 and 149
	Land adjacent to Old Orchard and Stream Pit Lane	Land parcel at Ringle Green Farm, to the south west of Bodiam Road,	WHOLE SITE Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane	NORTHERN PART OF SITE: Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane
Air	0 / -	0 / -	-	0 / -
Biodiversity	0	0	0	0
Business Growth	0	0	0	0
Climate Change	0	0	0	0
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	+	+	+
Equality	0	0	0	0
Health	0	0	0	0
Heritage	0	0	- / - -	-
Housing	0 / +	0 / +	+	0 / +
Land use	-	-	-	-
Landscape	0 / -	- -	- -	0 / -
Noise	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	- / - -	- -	- / - -	- / - -
Travel	- / - -	- -	- / - -	- / - -
Waste	0	0	0	0
Water	0 / +	0 / +	0 / +	0 / +
Commentary	A reasonable site let down by poor services, facilities and travel options in this rural settlement and the subsequent effects of this on the air quality objective. Although relatively small, the site is likely to compromise the setting of the AONB and its associated features.	A site that scores mostly neutral, let down by poor services and facilities in the settlement and more remote location of site relative to settlement as well as landscape impact and land use, being the loss of a greenfield site in the AONB and of a scale that would be out of keeping with the settlement	A reasonable site let down by poor services, facilities and travel options in this rural settlement and the subsequent effects of this on the air quality objective. This larger site submission would have negative effects on heritage, land use and landscape scores, resulting in the loss of a larger greenfield site in the AONB and an historic field, having a greater impact on the setting of the settlement and heritage assets (historic farmstead and Windmill).	A reasonable site let down by poor services, facilities and travel options in this rural settlement and the subsequent effects of this on the air quality objective. Although relatively small, the site is likely to compromise the setting of the AONB and its associated features. Likewise, careful design will be needed to avoid impacts upon nearby heritage assets (historic farmstead and Windmill).

Sustainability Objective	Scores for Reasonable Sites in Sandhurst (part 2 of 2)			
	299	320	AS_11	AS_50
	Oaklands Farm, Bodiam Road	Land at Old Well House, Rye Road	Kerrys Yard (New yard) Bodiam Road	Land to the rear of Sandhurst Farm Shop, Queen Street
Air	-	0 / -	0 / -	-
Biodiversity	0 / -	0	0	0 / -
Business Growth	0	0	? / -	0
Climate Change	? / -	0	0	0
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	+	?	+
Equality	0	0	0	0
Health	0	0	0	0
Heritage	- / - -	- -	0	- -
Housing	+	+	0 / +	0 / +
Land use	-	-	-	-
Landscape	- -	- / - -	- / - -	- -
Noise	0	0	0	0
Resources	0 / ?	0 / ?	? / -	0 / ?
Services & Facilities	- -	- / - -	- -	- -
Travel	- -	- / - -	- -	- -
Waste	0	0	0	0
Water	0 / -	0 / +	0 / +	0 / -
Commentary	A site that scores mostly neutral, let down by poor services and facilities in the settlement and more remote location of site relative to settlement as well as landscape impact influenced by loss of a site that is part historic field in the AONB and land use and a site the scale of which would be out of keeping with the settlement	A reasonable site let down by poor services, facilities and travel options in this rural settlement and the subsequent effects of this on the air quality objective. Although relatively small, the site is likely to compromise the setting of the AONB and its associated features. The site results in the loss of an historic field in the AONB across which is an historic routeway (Public Right of Way) and it lies adjacent to an historic settlement and to open ponds. It also lies in close proximity to Sandhurst Windmill, a heritage asset and adjacent to the Sandhurst Conservation Area. These influences have informed negative scores given for heritage and landscape.	A site that scores mostly neutral, let down by poor services and facilities in the settlement and more remote location of site relative to settlement as well as landscape impact.	A site that scores mostly neutral, let down by poor services and facilities in the settlement and a poor heritage score and landscape score reflecting the extent of archaeological potential on the site and historic routeways - PROW and roads in the AONB that run through the site and the loss of a greenfield site in the AONB.

Appendix T - Speldhurst

Sustainability Objective	Scores for Reasonable Sites in Speldhurst (part 1 of 3)			
	27	42	94	231
	1) Land adjacent to the rear of Asher Reeds and 2) Land adjacent to Cherry Trees, Farnham Lane, Langton Green	Land at High View, Langton Road, Langton Green, Tunbridge Wells TN3 0BB	Land at Milford House, Penshurst Road, Speldhurst, TN3 0PH	Land to the west of Speldhurst Road and south of Ferbies, Speldhurst, TN3 0NS
Air	0	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0
Business Growth	0	0	0	0
Climate Change	0	0	0	0
Deprivation	0	0	0	0
Education	0 / -	0 / -	0 / -	0 / -
Employment	+	+	+	+
Equality	0 / -	0 / -	-	-
Health	0	0	0	0
Heritage	0	0	0	0
Housing	+	+	+	+
Land use	--	-	-	- / --
Landscape	0 / -	0 / -	-	0 / -
Noise	0	- / --	-	-
Resources	0 / ?	0 / ?	0 / -	0 / ?
Services & Facilities	-	-	-	-
Travel	-	0 / -	0 / -	0 / -
Waste	0	0	0	0
Water	0	0	0	0 / +
Commentary	A site with many neutral scores and some positives to housing provision. It is let down by its location relative to key services and facilities and high demand for school provision and on land use where this would result in the loss of a greenfield site in the Green Belt, part of a larger parcel with very high harm, and landscape given the loss of this greenfield site in the AONB.	A site with many neutral scores that scores positive for housing provision and neutral/negative in terms of travel. Its score is let down by demand for school places and land use and landscape impacts, being the loss of a greenfield site in the AONB which forms part of a broader parcel with very high impact if released from the Green Belt. Score informed however by the fact this is a relatively small site.	A reasonable site with several neutral scores, let down by a lack of key services and facilities and lack of pavement to the centre of the settlement/likely ability to provide this therefore making the site less suitable for those with disabilities.	The education objective scores slightly negative because the existing primary is in high demand. The equality objective scores negative because selective education choices are easier to access than non selective, and the distance of the site to Speldhurst facilities may disadvantage disabled persons. Land use score reflects the harm that would be caused by loss of the Green Belt, green field land and underlying soils. Bus services from Speldhurst are not regular and some services are lacking. Noise scores negatively because the site is within the main flight path for Gatwick airport. The site is in a sensitive, edge of settlement location within the AONB. The scale is in keeping with the existing settlement but sensitive design will be necessary.

Sustainability Objective	Scores for Reasonable Sites in Speldhurst (part 2 of 3)			
	239	337	338	386
	Land adjacent to Rusthall recreation ground, Southwood Road, Rusthall	Allotment land North East of the end of Southwood Road, Rusthall and adjacent to Peacock Farm	Land between Ferbies and Ewehurst lane, Langton road, Speldhurst	Ashwood Lodge Farm, Penshurst Road, Speldhurst, Tunbridge Wells
Air	0	0	0 / -	0 / -
Biodiversity	0	0	-	0
Business Growth	0	0	0	0
Climate Change	0	0	0	0
Deprivation	0	0	0	0
Education	0	+	- - -	0 / -
Employment	+	+	+	+
Equality	0	0 / -	-	-
Health	0 / +	0	0	0
Heritage	0	0	- -	0
Housing	0	+	+	+
Land use	0	- / - -	- - / - - -	-
Landscape	0	-	- -	-
Noise	0	0	- -	-
Resources	0	? / -	0 / ?	0 / -
Services & Facilities	0 / +	0 / -	-	-
Travel	0	0	0 / -	0 / -
Waste	0	0	0	0
Water	0	0	0	0 / -
Commentary	A largely neutral site that scores positively for health and services objectives reflecting the opportunity to expand the existing leisure facilities. Land use scores neutral under the assumption that the site is not converted entirely to hardstanding and potentially valuable soils are lost. This site is near to the border with Rusthall parish and so cross boundary effects have been considered. Landscape impacts score neutral under the proviso that flood lighting would not affect the dark, rural skies in this area.	A reasonably well located site adjacent to the settlement, which has a limited range of key services and facilities. Let down by impact on the Green Belt (high impact) and being the loss of a largely greenfield site in the AONB. There is concern about the ability to provide a suitable means of access to this site and the ability of some, less mobile residents to access services and facilities in a safe manner due to lack of suitable pavement.	The education objective scores slightly negative because the existing primary is in high demand. The equality objective scores negative because selective education choices are easier to access than non selective, and the distance of the site to Speldhurst facilities may disadvantage disabled persons. Land use score reflects the harm that would be caused by loss of the Green Belt, green field land and underlying soils. Bus services from Speldhurst are not regular and some services are lacking. Noise scores negatively because the site is within the main flight path for Gatwick airport. The site is in a sensitive, edge of settlement location within the AONB. The scale is in keeping with the existing settlement but sensitive design will be necessary.	A site with neutral scores, let down by a lack of key services and facilities and lack of pavement to the centre of the settlement/likely ability to provide this therefore making the site less suitable for those with disabilities.

Sustainability Objective	Scores for Reasonable Sites in Speldhurst (part 3 of 3)		
	416	AS_15	AS_39
	Land North of Langton House, Langton Green	Hérons Oast Farm, Speldhurst Road, Langton Green, Tunbridge Wells	Dragonfly Farm, Langton Road, Speldhurst TN3 0NR
Air	0	0 / -	0 / -
Biodiversity	0	0 / -	0 / -
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	+++	0 / -	0 / -
Employment	0	+	+
Equality	0	-	-
Health	0	0	0
Heritage	0	- / - -	0
Housing	0	++	+
Land use	0	--	- / - -
Landscape	0	- / - -	0 / -
Noise	0	-	-
Resources	0	? / -	? / -
Services & Facilities	0	-	-
Travel	0	0 / -	0 / -
Waste	0	0	0
Water	0	0 / ?	0 / +
Commentary	This site is suitable as safeguarding land for future school expansion and thus scores very positive in the education objective with other objectives given neutral scores as have no relevance.	A site located adjacent to the existing settlement, which scores mostly neutral. It scores positively in terms of housing but negatively on education given the high demand for school place at the Primary School. It also scores negatively for land use, informed by loss of the site in a broader parcel of Green Belt the release of which would have very high impact. It scores negatively on landscape reflecting the loss of primarily greenfield land in the AONB, its location adjacent to an historic farmstead and an historic routeway (road).	The education objective scores slightly negative because the existing primary is in high demand. The equality objective scores negative because selective education choices are easier to access than non selective, and the distance of the site to Speldhurst facilities may disadvantage disabled persons. Land use score reflects the harm that would be caused by loss of the Green Belt, green field land and underlying soils. Bus services from Speldhurst are not regular and some services are lacking. Noise scores negatively because the site is within the main flight path for Gatwick airport. The site is in a sensitive, edge of settlement location within the AONB. The scale is in keeping with the existing settlement but sensitive design will be necessary.