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Tunbridge Wells Borough Local Plan

**Sustainability Appraisal  
of the  
Pre-Submission Local Plan**

**Version for Regulation 19 Consultation 2021**

February 2021

## Document History

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

### Sustainability Appraisal Scoping Report (Stage A)

Date	Title	Content
June 2016	Sustainability Appraisal Scoping Report Consultation Draft	Issue for stand alone consultation
October 2016	Sustainability Appraisal Scoping Report <a href="#">Final Report</a>	Updated following consultation with statutory bodies and other interested parties, and consideration of new studies

### 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
Dec 2017 and May 2019	Sustainability Appraisal Assessment Report Issues and Options Stage <a href="#">Final Report</a>	Updated following consultation with statutory bodies and other interested parties, and consideration of new studies.  Latest update includes minor changes.
July 2019	Sustainability Appraisal of the Draft Local Plan <a href="#">Consultation Draft</a>	Issue for consultation alongside Draft Local Plan Report

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<b>Date</b>	<b>Title</b>	<b>Content</b>
Jan 2021	Sustainability Appraisal of the Reg 19 Pre- Submission Local Plan  Consultation Draft  This report.	Issue for consultation alongside the Reg 19 Pre-Submission Local Plan



## 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 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 basis for determining the degree to which the 19 sustainability objectives were supported by all the various elements of the emerging Local Plan, namely:

- the eleven 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 has informed policy choices and enabled mitigation measures to be recommended so that the beneficial effects of the 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 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 Plan](#).

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

A simple compatibility test was undertaken to determine how well the eleven 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 but there

was also some uncertainty created by the lack of detail inherent within the strategic 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 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 Royal Tunbridge Wells (RTW) and Pembury
- Growth Strategy 5 – growth within a new, free-standing settlement
- A sixth option that assumed no plan was prepared or adopted, with essentially unplanned, market-led growth.

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 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.

As the Local Plan progressed, these growth strategy options were further refined and several new options were identified that considered a range of different scales and distributions for development across the borough. This included consideration of the potential to meet unmet housing need from elsewhere.

The range of options have been further refined in response to comments on the Draft Local Plan and more recent information. These are summarised below:

Growth Strategy 1	No Green Belt	Meeting housing need of 346 dwellings per year with no loss of greenbelt
Growth Strategy 2	No AONB	Meeting housing need of 560 dwellings per year without major development in the AONB
Growth Strategy 3	Draft Local Plan	Meeting the existing capped housing need of 678 dwellings per year with a large PW extension and new garden village at Tudeley
Growth Strategy 4	Main Towns	Meeting the existing capped housing need without garden village at Tudeley)
Growth Strategy 5	Main Towns & Large Villages	Meeting the existing capped housing need without strategic sites by directing growth largely to main towns
Growth Strategy 6	Meet Need with no MGB loss	Meeting existing capped housing need focused on settlements outside Metropolitan Green Belt (MGB); also growth moderated in the AONB
Growth Strategy 7	Proportional to Services	Meeting the existing capped housing need without strategic sites and with a wider distribution based on the relative level of services and facilities of all settlements
Growth Strategy 8	Services and AONB	As for Growth Strategy 6 but with adjustments in distribution made to further moderate growth in the AONB
Growth Strategy 9	Dispersed Countryside	Meeting the existing capped housing need with strategic sites and by directing a large proportion of development into rural areas
Growth Strategy 10	Uncapped Need	Meeting the uncapped housing need of 749 dwellings per year with strategic sites and a 30% increase in growth elsewhere
Growth Strategy 11	Uncapped & Unmet Need	Meeting the uncapped housing need and unmet need from elsewhere with strategic sites and further Green Belt release and growth in the AONB (853 dwellings per year)
Growth Strategy 12	No Local Plan	Windfall sites alone provide for development needs.

Sustainability appraisals of these 12 growth strategies were then undertaken and reviewed in order to help develop a suitable strategy for the Pre-Submission Local

## Plan.

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. Following the maximisation of sustainable development in settlements across the borough, 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 proposals would involve significant loss of Green Belt land, it being found unreasonable for such large growth to occur in the AONB and there being no sustainable opportunities outside of the AONB. However, these are justified in part on meeting development needs, given the limited capacity for this scale of growth to be otherwise distributed across the borough. Hence, the preferred strategy combines strategic growth by focussing on settlements with the best services and facilities, but also with some growth to smaller settlements, whilst limiting growth within the AONB.

The key overall findings of this process were that significant beneficial effects are expected for most economic and social sustainability objectives. The environmental objectives are 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 inclusion of a new garden settlement and large urban expansion were found to be 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, for the urban extension, although multiple settlements were considered, Paddock Wood was the only reasonable location for an extension and that a scale that maximises benefits for the housing objective whilst being 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, in Capel Parish, to help address existing flooding issues, would provide a suitable and achievable, scale of extension. This option was found to have benefits for the economic, environmental and social elements of sustainability, albeit with most benefits being social and economic, rather than environmental.

The strategic growth of Paddock Wood is supplemented by a new garden village if housing needs are to be met. Although multiple locations were considered, 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 2,800 new dwellings.

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 – Place Shaping and Design
- STR 3 – Brownfield Land
- STR 4 – Ensuring Comprehensive Development
- STR 5 – Infrastructure and Connectivity
- STR 6 – Transport and Parking
- STR 7 – Climate Change
- STR 8 – Conserving and Enhancing the Natural, Built and Historic Environment
- STR 9 – Green Belt
- STR 10 – Neighbourhood Plans

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 Assessment](#). 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 sites for the SA to assess.

Once SA assessments were completed, suitable sites were recommended for allocation alongside advice for how potential negative effects could be mitigated. Sites were then grouped into parishes (or settlements for Royal Tunbridge Wells) 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 critical to 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 employment sites and 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 Delivery
- Types of 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 relied 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

As part of the Sustainability Appraisal process, numerous recommendations for mitigation and positive enhancements were made during the development of each element of the 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 C.

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

Potential measures for monitoring the significant effects of implementing the Local Plan are listed for each of the 19 sustainability objectives in Chapter 10. 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.

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# 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 2020 - 2038. 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
- other strategic policies to also guide both place shaping and development management policies
- Place Shaping Policies, including both parish/settlement strategies and 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 Notable objectives of the new Local Plan are to seek 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:

- 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 [Local Plan document](#) published for consultation alongside this document.

## 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 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).

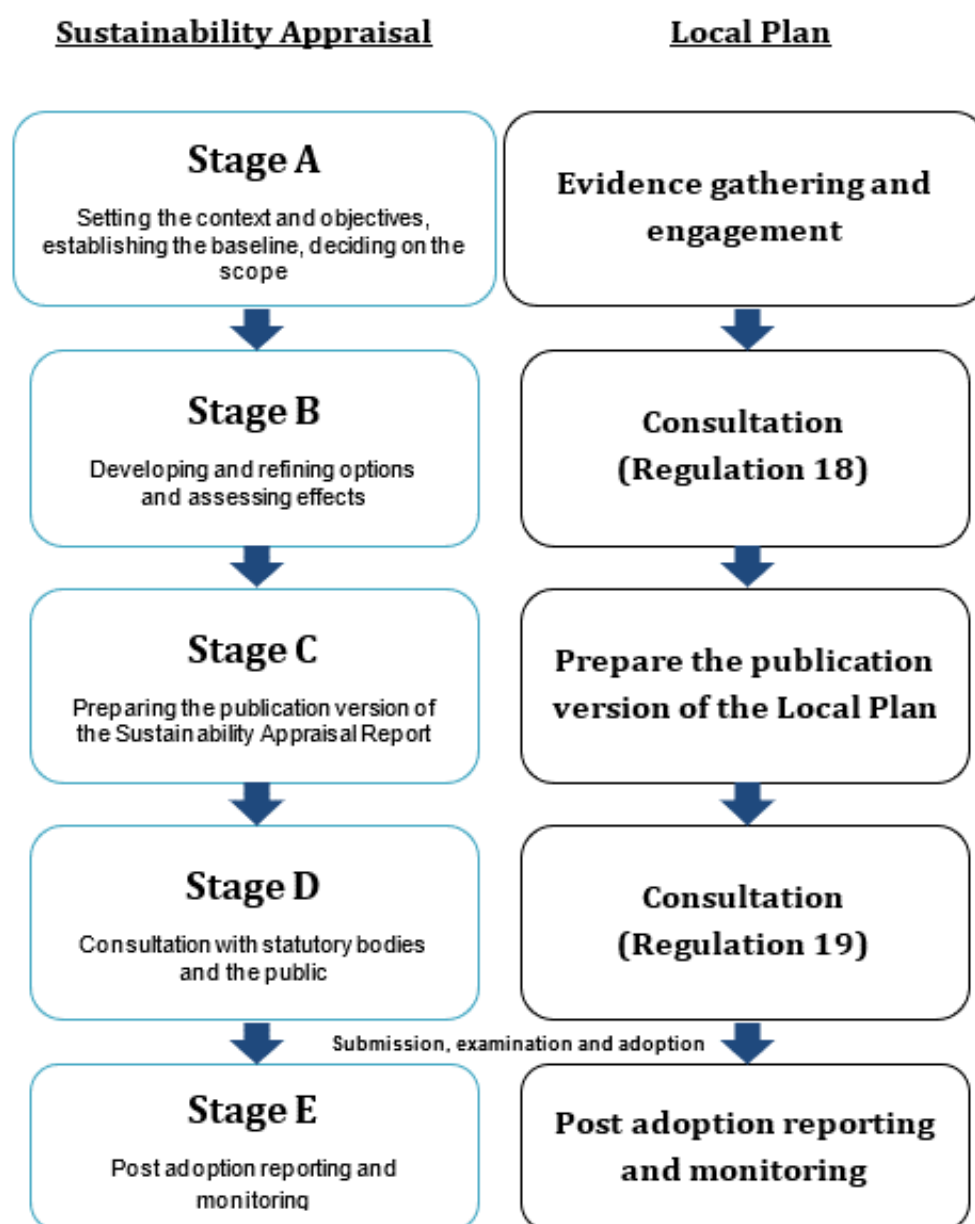
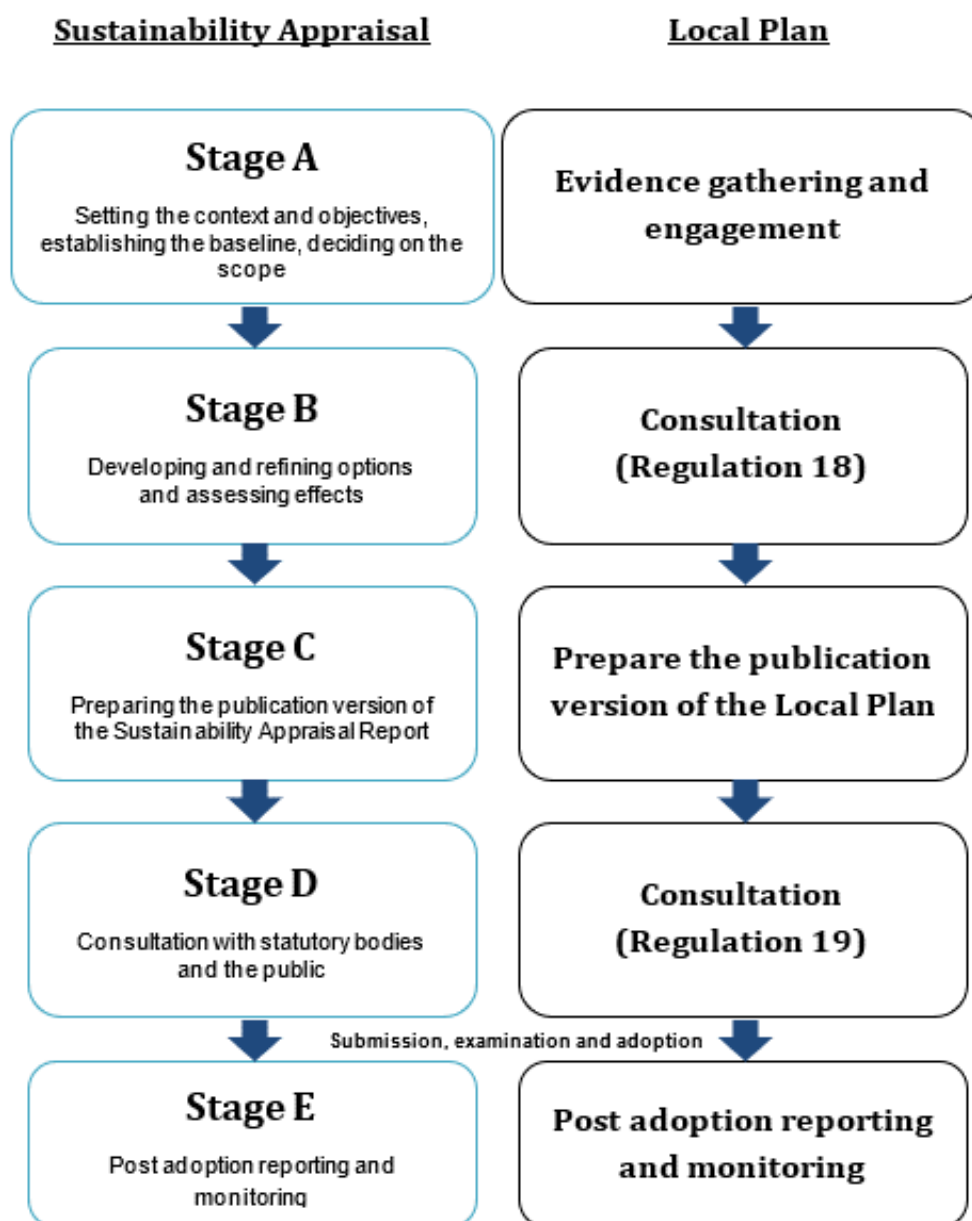


Figure 1. Key stages of Local Plan preparation and the relationship with the SA process. (Adapted from Planning Practice Guidance Reference ID: 11-013-20140306.)

## 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 Appraisal. 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



1.3.4 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.

1.3.5 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 |

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

## 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 summarised in Appendix H of the Scoping Report, Appendix C of the Interim SA Report and the Consultation Statement for Regulation 18 Draft Local Plan.
- 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 will be sent to the three statutory environmental consultees.
- 2.2.2 In addition, all residents, organisations and authorities on the Borough Council's database will be 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

### 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 It is noted that (at the time of writing) the UK is due to leave the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). This established a transition period, which is currently set to end on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law, including the SEA Regulations.
- 3.1.3 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 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 Local Plan (this report) Chapters 1 and 4.

SEA Regulations Requirements	Relevant Report
<p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	<p>Scoping Report (2016) Section 3.4</p> <p>Issues and Options Sustainability Appraisal (2017) Chapter 4</p> <p>Sustainability Appraisal for the Local Plan (this report) Chapters 1, 3 and 4.</p>
<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 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 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 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 Local Plan (this report) Chapters 5, 6, 7, 8 and 9.</p>

SEA Regulations Requirements	Relevant Report
<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 Local Plan (this report) Appendix C</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 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 6</p> <p>Sustainability Appraisal for the Local Plan (this report) Chapter 10</p>
<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 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 Local Plan (this report) Chapter 2</p>

SEA Regulations Requirements	Relevant Report
<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"> <li>- the plan or programme adopted</li> <li>- the environmental report</li> <li>- a statement summarising:               <ul style="list-style-type: none"> <li>(a) how environmental considerations have been integrated into the plan or programme;</li> <li>(b) how the environmental report has been taken into account;</li> <li>(c) how opinions expressed in response to:                   <ul style="list-style-type: none"> <li>(i) the invitation referred to in regulation 13(2)(d);</li> <li>(ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</li> </ul> </li> <li>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</li> <li>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</li> </ul> </li> </ul>	<p>Adoption statement (future report).</p> <p>To be prepared when the Local Plan has been adopted.</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 6</p> <p>Sustainability Appraisal for the Local Plan (this report) Chapter 10</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 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 As explained in paragraph 3.1.2, the UK is leaving the EU on 31st January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act") which retains EU law. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for Habitats Regulations Assessments (HRA) will continue after the end of the Transition Period.
- 3.2.4 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 Local Plan were assessed for potential conflicts with this European site.
- 3.2.5 The HRA identified two potential linking pathways that could result in adverse effects upon the Ashdown Forest SAC and SPA that could act in combination with other projects and plans: recreational pressure and traffic-related air quality.
- 3.2.6 Within the Ashdown Forest SAC, all types of heathland habitat are sensitive to air pollution. Within the Ashdown Forest SPA, the nightjar and Dartford warbler bird species, both somewhat rely on heathland habitat for foraging and breeding and are therefore indirectly impacted by increases in atmospheric pollution through changes to habitat.

- 3.2.7 Despite several significant roads, most notably the A26 and A275, traversing the SAC, the Air Quality Modelling Report found that changes to roadside air quality within 200m of Ashdown Forest SAC and SPA as a result of the projected development outlined in the TWB Local Plan in combination with other plans and projects are expected to result in a negligible impact (possibly in the form of a slight retardation effect of air quality improvement) on a small part of this European site.
- 3.2.8 The Ashdown Forest SPA is vulnerable to recreational pressure because of the risk of reducing the breeding success of nightjar and Dartford warbler, which are ground nesting birds. However, the nearest settlement in Tunbridge Wells Borough (Speldhurst) is over 7km away and a visitor survey of the Ashdown Forest carried out in summer 2016 found that a very small proportion of the visitors to Ashdown Forest are from Tunbridge Wells.
- 3.2.9 For these reasons, it can be concluded that that the Local Plan will not have a significant adverse effect upon the Ashdown Forest (either alone or in combination with other plans).
- 3.2.10 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 As part of the scoping exercise, a baseline review of the environmental, social and economic issues relevant to Tunbridge Wells borough was undertaken. As four years has now past since this process was first completed, this information has now been reviewed and updated in Appendix A.
- 4.1.3 Table 2 below provides a list of additional relevant evidence studies that became available for consideration during Stage B following publication of the Sustainability Appraisal for the Draft Local Plan in July 2019. The implication of these studies for the baseline data underlying the Sustainability Appraisal is discussed.

Table 2. New evidence studies and implications for the SA.

<b>Evidence</b>	<b>Source</b>	<b>Completion Date</b>	<b>Overview</b>	<b>Implication for the SA</b>
Green Belt Study (Stage 3)	External consultant commissioned by TWBC	Nov 2020	Detailed assessment of specific land parcels to determine contribution to the purposes of the Green Belt and level of harm caused by their removal.	The SA method or baseline data does not need updating but the information has helped determine the scores for the 'Land Use' objective.
Local Housing Need Review	External consultant commissioned by TWBC	Winter 2020	Study to determine appropriate method for determining housing needs in the borough	SA method or baseline data does not need updating. However, findings have helped determine reasonable alternatives for the growth strategy.



<b>Evidence</b>	<b>Source</b>	<b>Completion Date</b>	<b>Overview</b>	<b>Implication for the SA</b>
Infrastructure Development Plan 2020 update	TWBC Policy Team, with inputs from service providers	Dec 2020	Provides information on availability and need for essential infrastructure across the borough e.g. schools, utilities	Findings considered during the SA process
Role and Settlement Study 2020 update	TWBC Policy Team	Autumn 2020	An assessment of infrastructure and services in each settlement.	The SA method does not need updating but the information has helped determine the overall score for the 'Services and Facilities' and 'Travel' objectives.
Transport Assessment Report Update	External consultant commissioned by TWBC	December 2020	Consideration of traffic impacts of proposed Draft Local Plan	Findings considered during preparation of the SA
HRA for Draft Local Plan Reg 18 including Air Quality Impact Assessment	External consultant commissioned by TWBC	December 2020	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.	Findings have been used to influence scoring for biodiversity objective.

<b>Evidence</b>	<b>Source</b>	<b>Completion Date</b>	<b>Overview</b>	<b>Implication for the SA</b>
Landscape and Visual Impact Assessment	External consultant commissioned by TWBC	Summer 2020	Provides recommendations on major sites within the AONB being considered for allocation included suggested mitigation measures	Findings have been used to influence scoring for landscape objective.
Retail, Leisure and Town Centre Uses Study	External consultant commissioned by TWBC	Autumn 2020	An up-to-date study that considers the vitality and viability of existing centres in the borough and determines the needs for new retail and leisure provision.	Recommendations have been used to inform the scores for growth strategies and sites
Strategic Sites Master planning and Infrastructure Study	External consultant commissioned by TWBC	December 2020	Development of master planning proposals for the delivery of strategic sites.	Findings have been used to influence scoring for the strategic sites.
AONB Setting Study	External consultant commissioned by TWBC	Sept 2020	An analysis to determine how development of certain select sites would affect the setting of the AONB.	Findings have been used to influence scoring for the landscape objective.
Grassland Study	External consultant commissioned by TWBC	Sept 2020	Survey to determine the botanical and ecological importance of select sites being considered for	Findings have been used to influence scoring for the biodiversity objective.

Evidence	Source	Completion Date	Overview	Implication for the SA
			allocation.	
Local Cycling and Walking Infrastructure Plan and further Local Cycling and Walking Infrastructure and Low Traffic Neighbourhood Plan	TWBC Economic Development Team	November 2019 December 2020	Report presents a strategic approach to identifying cycling and walking improvements in the RTW area.	Findings have been used to make recommendations for mitigation measures.

## 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	Updates considered where relevant during the Sustainability Appraisal process.

Title	Date	Purpose	Implication for SA
		interpreted. Updates to Brownfield Registers, Build to Rent, Climate Change, Historic Environment, Vitality of towns, Health and Wellbeing made since 2017.	
Biodiversity 2020: A strategy for England's Wildlife and Ecosystem Services	2018	Detail on how international and EU commitments are being implemented in England.	Findings considered where relevant during the Sustainability Appraisal process.
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.	Findings considered where relevant during the Sustainability Appraisal process.
The Housing and Planning Act	2016	Detail on Right to Buy, Pay to Stay, Starter Homes, Private rented sector etc.	Findings considered where relevant during the Sustainability Appraisal process.
DCLG White Paper - Fixing Our Broken Housing Market	2017	Plans to reform the housing market and boost supply of new homes.	Findings considered where relevant during the Sustainability Appraisal process.
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.
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

Title	Date	Purpose	Implication for SA
			consultations of the Issues and Options SA (see paragraph 4.3.12).
Heritage Counts. Carbon in the Built Historic Environment	May 2020	Trends and data about the heritage sector focusing on how upgrading and reusing existing buildings is preferable to demolition.	The SA method or baseline data does not need updating but the information has helped determine the scores for the 'Resources' objective.
The Environment Bill	Estimated Royal Assent Spring/Summer 2021	<p>New bill to manage the impact on human activity on the environment, creating a more sustainable and resilient economy and enhancing well-being and quality of life. Key aspects include air quality, water, waste and resources and biodiversity.</p> <p>The Environment Bill intends to enact the 25-year environment plan issued in 2008. Key wording for biodiversity is "regain and retain", not just conserve which is no longer enough.</p>	Considered where relevant during the Sustainability Appraisal process.

Title	Date	Purpose	Implication for SA
The Road to Zero	2018	Analysis of how the UK will meet demand and targets for the design and manufacture of zero emission vehicles.	Considered where relevant during the Sustainability Appraisal process.
National Design Guide	2019	To set out the characteristics of well-designed places	Considered where relevant during the Sustainability Appraisal process.

Table 4. Additional key regional plans, policies and programmes

Title	Date	Purpose	Implication for SA
High Weald AONB Management Plan 2019 - 2024	2019	To coordinate policy, investment and action in the nationally important AONB landscape in order to conserve and enhance its natural beauty.	The SA method does not need updating but the information further justifies the importance of the Landscape objective.
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 capacity limitations 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 B)

Title	Date	Purpose	Implication for SA
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 Minerals and Waste Local Plan 2013 - 2030	Sept 2020	To provide detail for safeguarding purposes of mineral deposits and waste management facilities parcels across the borough.	Numerous safeguarding areas have been identified across the borough. The SA method or baseline data does not need updating but the information has helped determine the scores for the 'Resources' objective.
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.
Kent Biodiversity Strategy 2020 - 2045	Feb 2020	To maintain, restore and create wildlife habitats in Kent.	The SA method does not need updating but the information further justifies importance of the biodiversity objective.
Water Resources South East (WRSE) Framework	Summer 2020 (consultation)	Long-term regional resilience plan and methodology for assessing resilience.	Findings considered where relevant during the Sustainability Appraisal process.

Title	Date	Purpose	Implication for SA
Kent and Medway Low Emissions Strategy	June 2020	To set out the response to the UK climate emergency and drive clean, resilient economic recovery across Kent and Medway.	The SA method does not need updating but the information further justifies importance of the climate change objective.

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 and modified in April 2020.	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.
Wealden District Council New Local Plan	Ongoing	Plan withdrawn Feb 2020. Council has since begun work on a new Local Plan.	Cross boundary effects to be confirmed, but ongoing liaison on Ashdown Forest SAC and SPA, reflected in HRA.
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	Review underway	Existing Plan contains allocations in Marden, Headcorn and Staplehurst accounting for approximately 1,500 new dwellings. Review likely to identify additional	Potential cross boundary effects will be considered by the SA.



Title	Date	Purpose	Implication for SA
		need. However, locations and spatial strategy currently unknown.	
Tonbridge and Malling Borough Council New Local Plan	Ongoing	Plan currently at examination. Hearing in Oct 2020 cancelled. 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		Plan submitted for Examination in April 2019. Currently subject to Judicial Review. The Plan does not meet the housing need for the District, so need to consider unmet need. No significant allocations are proposed near the boundary with Tunbridge Wells Borough Council.	Cross boundary effects unlikely, other than housing need likely to not be fully met, which will be considered by the SA.
Rother District Council Development and Site Allocations Local Plan	Adopted Dec 2019	No allocations close to border. However, NDP for Ticehurst (made July 2019) and Hurst Green (if made) may have small impacts.	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

4.3.2 Table 6.

Table 6. Sustainability Objectives for Tunbridge Wells Borough

<b>Num.</b>	<b>Topic</b>	<b>Objective</b>
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

4.3.3 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 including undesignated habitat
- The Ashdown Forest SAC and SPA
- Sites of Special Scientific Interest and associated risk zones

4.3.4 See Appendix B for a description of all decision-aiding questions for each objective.

4.3.5 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.

4.3.6 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 score. 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.
- 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.

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

4.3.8 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

4.3.9 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.

4.3.10 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 emerging Local Plan.

4.3.11 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 draft policy wording proposed for inclusion within the Pre-Submission Local Plan. Realistic mitigation measures, as proposed in emerging policies, were assumed to be in place when scores were applied.

4.3.12 It is noted a number of minor changes to the method were made following updates to baseline data and consultation of the Issues and Options SA. These were applied to the Draft Local Plan SA and have been consistently applied to the current Pre-Submission Local Plan SA. They are summarised in Table 7 below for completeness.

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(2) and M4(3) homes which has been highlighted in the latest Housing Needs Study. The changes also address concerns raised following consultation of the Issues and Options SA. Housing need calculations now have regard to the standard method.

Sustainability Objective	Update to Scoring Method	Reasoning
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.

4.3.13 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.

4.3.14 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 which describes the key findings from the appraisal scoring exercise. The written commentaries consider all Reasonable Alternative sites. Information on sites that were not considered to be Reasonable Alternatives can be found in the [SHEELA](#).

4.3.15 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

## 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 difference 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 Pre-Submission Local Plan where appropriate (see Appendix C).
- 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.
  - 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.

- Sustainable Development**
  1. To ensure sustainable development that contributes to both meeting housing, economic, and social needs and to conserving and enhancing the highly valued environmental qualities and amenities of the borough.
- Housing**
  2. To significantly boost the supply of affordable housing and ensure suitable housing for all sections of the population.
- Garden Settlements**
  3. To establish the role that garden settlements can make to the future delivery of development in the borough and to ensure such proposals create very high-quality living environments.
- Development Design**
  4. To promote high quality and well designed development that contributes to the local identity and character, and creates attractive environments.
- Infrastructure**
  5. To achieve the timely delivery of all forms of infrastructure that meet the needs of development and support the vitality of communities.
- Travel**
  6. To ensure good, safe access to jobs and services, with priority to active travel and public transport, as well as embracing new technology.
- Vibrant Borough**
  7. To ensure that the borough is vibrant, culturally rich, and economically buoyant.
- Distinctive Environment**
  8. To conserve and enhance the valued historic, built and natural environments of the borough, including the Area of Outstanding Natural Beauty, and to achieve net gains for nature.
- Green Belt**
  9. To ensure that the Green Belt continues to meet its purposes, only releasing land where strict tests are met.
- Climate Change**
  10. To support the goal to make the borough carbon neutral by 2030, and minimise the impact of climate change on communities, the economy, and the environment.
- Local Needs**
  11. To work with local communities to secure sustainable development to meet local needs, with due regard to neighbourhood plans where appropriate.

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. Air	2. Biodiversity	3. Business Growth	4. Climate Change	5. Deprivation	6. Education	7. Employment	8. Equality	9. Health	10. Heritage	11. Housing	12. Land Use	13. Landscape	14. Noise	15. Resources	16. Services	17. Travel	18. Waste	19. Water
LOCAL PLAN OBJECTIVES	1. Sustainable Development	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	2. Housing	X	X	?	X	✓	✓	✓	✓	?	X	✓	X	X	X	X	?	?	?	X
	3. Garden Settlements	?	?	✓	?	?	?	✓	?	?	?	✓	X	?	?	?	✓	✓	?	?
	4. Development Design	?	?	?	✓	✓	/	?	/	✓	✓	?	?	✓	?	?	?	?	?	?
	5. Infrastructure Needs	?	?	✓	?	✓	✓	✓	✓	?	?	✓	?	?	?	?	✓	✓	/	✓
	6. Travel	✓	?	✓	✓	?	?	✓	?	?	?	?	?	?	✓	/	✓	✓	/	/
	7. Vibrant Borough	/	/	✓	/	✓	✓	✓	✓	✓	✓	/	/	/	/	/	✓	✓	/	/
	8. Distinctive Environment	?	✓	?	✓	?	/	?	/	✓	✓	X	✓	✓	✓	✓	/	?	✓	✓
	9. Green Belt	?	✓	?	?	/	/	?	/	✓	✓	?	?	✓	?	?	?	?	/	/
	10. Climate Change	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	11. Local Needs	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

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). No colour indicates the mixed or uncertain objectives are more (or equally) frequent than the compatible objectives.

Local Plan Objective	NUMBER OF SUSTAINABILITY OBJECTIVES			
	Compatible	Incompatible	Mixed or uncertain	No relationship
Sustainable Development	19	0	0	0
Housing	5	9	5	0
Garden Settlements	5	1	13	0
Development Design	5	0	12	2
Infrastructure Needs	8	0	10	1
Travel	8	0	8	3
Vibrant Borough	9	0	0	10
Distinctive Environment	10	1	5	3
Green Belt	4	0	10	5
Climate Change	19	0	0	0
Local Needs	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 (or equally) frequent than the compatible objectives.

Sustainability Objective	NUMBER OF LOCAL PLAN OBJECTIVES			
	Compatible	Incompatible	Mixed or uncertain	No relationship
Air	4	1	5	1
Biodiversity	5	1	4	1
Business Growth	7	0	4	0
Climate Change	6	1	3	1
Deprivation	7	0	3	1
Education	6	0	2	3
Employment	8	0	3	0
Equality	6	0	2	3
Health & Wellbeing	7	0	2	0
Heritage	7	1	3	0
Housing	6	1	3	1
Land Use	4	2	4	1

<b>Sustainability Objective</b>	Compatible	Incompatible	Mixed or uncertain	No relationship
Landscape	6	1	3	1
Noise	5	1	4	1
Resources	4	1	4	2
Services & Facilities	7	0	3	1
Travel	7	0	4	0
Waste	4	0	3	4
Water	5	1	2	3

5.3.3 Table 9 shows that five out of the eleven Local Plan Objectives are more compatible than incompatible with the Sustainability Appraisal objectives. A further five Local Plan Objectives have a high degree of uncertainty and one Local Plan Objective is more incompatible than compatible.

5.3.4 The Strategic Objective for housing (objective 2) 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 (Sustainable Development) and 10 (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 11 (Local Needs) 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 Objective 3 (Garden Settlements) are based on those applied to Growth Strategy 5 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 included implementing new development management policies to ensuring adequate infrastructure could be provided (see Appendix C).
- 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 As drafts of the Local Plan were being developed, numerous further alternative growth strategies were identified for consideration through the Sustainability Appraisal. Some of these were described in the Draft Local Plan SA report and some have been developed since in order to address comments made during consultation. The full range of options tested during this updated SA process are described in Table 12. These alternatives consider a range of different scales and distributions for development across the borough and were informed by the most favoured sites in the SHEELA at Reg 18 and Reg 19 stages.

Table 12. Updated growth strategy options for the Local Plan considered by this SA

Growth Strategy	Description
<p>1: No MGB</p> <p>Housing supply: 346 dwellings per year (11,526-565 / 17)</p> <p>Strategic sites: None</p>	<p>This strategy reduces growth below the housing need level to one that does not involve any loss of Green Belt. The scale of housing is reduced by some 5,650 homes (49% of housing need for 11,526) and loss of large employment areas. Key allocations that have been removed from Growth Strategy 3 include Tudeley Village, 2,000 less dwellings at PW (western parcels) and, at RTW, removal of the allocations at North Farm industrial estate, Mabledon and Spratsbrook. Apart from this, the distribution remains the same as Growth Strategy 3 (the Draft Local Plan).</p> <p>The complete list of allocations that have been removed is as follows:</p> <ul style="list-style-type: none"> <li>• Tudeley Village</li> <li>• parcels west of Paddock Wood (in Capel Parish)</li> <li>• land at Mabledon and Nightingale</li> <li>• sites south of Pembury (PE1-3)</li> </ul>

Growth Strategy	Description
	<ul style="list-style-type: none"> <li>• SP1 at Speldhurst</li> <li>• edge sites at RTW, notably:               <ul style="list-style-type: none"> <li>- Wyevale (RTW14)</li> <li>- Spratsbrook (RTW16) and</li> <li>- Employment site (RTW17)</li> </ul> </li> </ul>
<p>2: No AONB Majors</p> <p>Housing supply: 560 dwellings per year (11,526-2000 / 17)</p> <p>Strategic sites: Yes</p>	<p>This strategy reduces development below the housing need to one that does not involve any major development in the High Weald AONB. This means that the scale of housing is reduced by between 1,600 - 2000 dwellings (17% of housing need for 11,526) and large employment areas are removed. Apart from this, the distribution remains the same as Growth Strategy 3 (the Draft Local Plan).</p> <p>The complete list of allocations to be removed, or reduced to minor development, is as follows:</p> <ul style="list-style-type: none"> <li>• Longfield Rd (RTW 17)</li> <li>• Spratsbrook (RTW 16)</li> <li>• Turnden Farm (CRS 1)</li> <li>• Crane Valley (CRS 3)</li> <li>• Copthall Avenue/Highgate Hill (HA 4)</li> <li>• Gills Green (HA 6) - employment</li> <li>• Gill's Green Farm (HA 7) - employment use</li> <li>• Brenchley Road, Coppers Lane, and Maidstone Road (BM 1)</li> <li>• Pembury - sites south of village (PE 1-3)</li> <li>• Land at Mabledon, Southborough</li> <li>• Gate Farm, Cranbrook</li> <li>• Golford Road, Cranbrook</li> <li>• Land at the Golf Course, Hawkhurst</li> <li>• Fowlers Park, Hawkhurst</li> <li>• Ashes Plantation, Matfield</li> </ul>
<p>3: Draft Local Plan</p> <p>Housing supply: 678 dwellings per year (existing capped need in line with the standard method)</p> <p>Strategic sites: Yes</p>	<p>This growth strategy is that of the Draft Local Plan and includes a large PW extension and new garden village at Tudeley.</p>
<p>4: Main Towns</p> <p>Housing supply: 678 dwellings per</p>	<p>Growth strategy based upon Option 1 of the Issues and Options SA with adjustments made to reflect the incorporation of growth along the A21 corridor, greater detail about the intention for site allocations and Development Management polices within the new Local Plan, the</p>

Growth Strategy	Description
<p>year (existing capped need)</p> <p>Strategic sites: Paddock Wood and east Capel only</p>	<p>updated evidence base (including Plans, Policies and Programmes) since the scoring was originally carried out in 2016/2017.</p> <p>To compensate for the absence of a new settlement at Tudeley (i.e. 2,100 dwellings within the plan period), this option assumes that:</p> <ul style="list-style-type: none"> <li>• RTW/SO has increased allocations, from c1,270 to c3,000 residential allocations</li> <li>• Paddock Wood and east Capel retains strategic growth of up to 4,000 allocations</li> <li>• Cranbrook has an increase from c760 to 1,200 residential allocations</li> <li>• Hawkhurst has an increase from c670 to 1,000 residential allocations</li> <li>• The residential allocations in villages are reduced by an average of a half (of c1,120 = c560), giving c40-50 each.</li> </ul>
<p>5: Main Towns &amp; Large Villages</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: No</p>	<p>Growth strategy based upon Option 2 of the Issues and Options SA 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 Role and Function Study 2020). Limited development within the remaining villages and rural areas, and no new garden settlement or strategic expansion of Paddock Wood and east Capel.</p> <p>Adjustments made to reflect the greater detail about the intention for site allocations and Development Management polices within the new Local Plan and the updated evidence base (including Plans, Policies and Programmes) since the scoring was originally carried out in 2016/2017.</p> <p>To compensate for the absence of a new settlement at Tudeley (i.e. 2,100 dwellings within the plan period), and less growth at PW, this option assumes:</p> <ul style="list-style-type: none"> <li>• RTW/SO has increased allocations, from c1,270 to c3,000 residential allocations</li> <li>• 2,250, rather than 4,000, at PW such that the development is considered large but not 'strategic' so is less effective at providing wider benefits such as flood alleviation elsewhere</li> <li>• Cranbrook has an increase from c760 to 1,200 residential allocations</li> <li>• Hawkhurst has an increase from c670 to 1,000 residential allocations</li> <li>• Pembury increases from 300 to 400 residential allocations</li> <li>• Rusthall increases from 15 to c400 residential allocations (i.e.</li> </ul>

Growth Strategy	Description
	<p>5% each)</p> <ul style="list-style-type: none"> <li>• Goudhurst, Benenden, Brenchley and Langton Green (Speldhurst) and Horsmonden each have c250 residential allocations (3% each)</li> <li>• The residential allocations in remaining villages are reduced by an average of a half (of c440 = c220), giving c30-40 each.</li> </ul>
<p>6: Meet need with no Green Belt (MGB) loss</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: No</p>	<p>No new garden village or urban extension of PW and east Capel into Green Belt, or other Green Belt releases. Growth to meet housing need focused on settlements outside Green Belt; also, growth moderated in the AONB. To meet housing need, this would include:</p> <ul style="list-style-type: none"> <li>• Major growth of Paddock Wood, with focus to south-east (c4,000)</li> <li>• Major growth Horsmonden (c1,000)</li> <li>• Major growth at Frittenden (c800)</li> <li>• Major growth at Sissinghurst (c800)</li> <li>• Growth of AONB settlements as per Option 8</li> </ul> <p>This option was appraised in order to respond directly to presumption to retain Green Belt and focus growth elsewhere. It follows that major development would still take place in the AONB but be primarily focussed on settlements outside it as well as beyond the Green Belt. Paddock Wood is still the prime growth point, but with focus away from the Green Belt, together with the 3 ‘unconstrained’ villages.</p> <p>Note: There is further consideration of major growth of these villages in relation to new settlements, while options for growth around Paddock Wood are also separately appraised below.</p>
<p>7: Proportional to Services</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: No</p>	<p>Growth strategy based on the relative levels of services and facilities of settlements. The development distribution would be similar to Option 3 of the Issues and Options stage SA which described a proportional distribution across all the borough’s settlements but this time with regard to the relative sustainability of settlements in terms of services and facilities. The updated Role and Function Study 2020 has been referred to for this assessment.</p> <p>Adjustments made to reflect the greater detail about the intention for site allocations and Development Management polices within the new Local Plan and the updated evidence base (including Plans, Policies and Programmes) since the scoring was originally carried out in 2016/2017.</p> <p>In terms of residential allocations, this option assumes:</p> <ul style="list-style-type: none"> <li>• 25% to RTW/SO (c2,250)</li> <li>• 10% each to PW, Cranbrook and Hawkhurst (c900 each)</li> <li>• 7.5% each to Pembury and Rusthall (c650 each)</li> </ul>



Growth Strategy	Description
	<ul style="list-style-type: none"> <li>• 3% each to 5 Group D villages (c250 each)</li> <li>• 2% each to 6 Group E villages (c180 each)</li> <li>• 1.5% each to 2 Group F villages (c100 each)</li> </ul>
<p>8: Services and AONB</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: No</p>	<p>This growth strategy is similar to Growth Strategy 7 but moderated where settlements are within the AONB. This means a lower proportion of growth is allocated to Cranbrook, Hawkhurst and the smaller settlements which are washed over by this sensitive landscape.</p> <p>For this option, it is assumed that the scale of development at AONB settlements is half of the level in Development Strategy Option 6, specifically:</p> <ul style="list-style-type: none"> <li>• Cranbrook and Hawkhurst c450 each;</li> <li>• Pembury (as enveloped by AONB) 325;</li> <li>• Goudhurst, Langton Green, Benenden and Brenchley c125 (Group D villages in 2020 Role and Function Study excluding Horsmonden);</li> <li>• Lamberhurst, Speldhurst, Sandhurst, and Bidborough villages c90 each (Group E villages in 2020 Role and Function Study excluding Five Oak Green and Sissinghurst);</li> </ul> <p>This is an overall reduction of c25% of allocations in those settlements, which is balanced by proportional increases in RTW/SO, Rusthall, Horsmonden, Five Oak Green, Sissinghurst and Frittenden.</p>
<p>9: Dispersed Countryside</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: Yes</p>	<p>This Growth Strategy is based upon is based on a distribution that meets the identified needs by directing development into rural areas, much less to existing villages and much more to hamlets and farmsteads, particularly in the AONB.</p> <p>This option assumes that the growth of settlements outside of RTW/SO and the strategic sites is a half of that proposed in the DLP, equivalent to an overall reduction of 1,275. This number is to be redistributed to hamlets and other enclaves of development, including farmsteads across the countryside, with c5-20 new dwellings in c75-200 locations.</p> <p>It was assumed that business growth in RTW would still be possible as the urban distribution is still similar to Growth Strategy 3 (Draft Local Plan). Instead, the rural AONB distribution is altered.</p>
<p>10: Uncapped Need</p> <p>Housing supply: 741 dwellings per year</p>	<p>A growth strategy that meets the ‘uncapped’ local housing need to reflect national planning practice guidance, as it was found possible to meet the needs for the borough under the standard method.</p> <p>The distribution is as per Growth Strategy 3 (Draft Local Plan) with further development across settlements, including in the AONB.</p>

Growth Strategy	Description
Strategic sites: Yes	It is assumed that, as the strategic sites are being developed to their maximum capacity within the plan period and equate to 2/3 of total allocations, there would be an average 30% increase across other growth locations, with an additional 1,000+ homes in total. With potential sustainable growth outside the AONB already maximised, it is assumed a high proportion of this would be at AONB settlements.
11: Uncapped & Unmet Need  Housing supply: 853 dwellings per year  Strategic sites: Yes	<p>A growth strategy that meets the uncapped housing need plus unmet housing need from elsewhere. The development would meet the higher housing need figure of 741 dwellings per year as well as some unmet need from elsewhere, equivalent to some 1,900 dwellings currently unmet in Sevenoaks Borough. The overall scale of growth is 847 dwellings per year (741+1900/18) which is 25% above local housing need. Distribution as per Growth Strategy 9 above, but with likely further development in the AONB.</p> <p>The overall scale of growth is c 3,000 homes more than housing need under the (capped) standard method. (741-678=63x18=1,134+1,900) The distribution is as per option 9 above, but likely still further housing in the AONB as well as the loss of more (relative to Option 3: the DLP) Green Belt, including the losses around RTW/Southborough.</p>
Option 12: No Local Plan	This growth strategy involves no planned growth. Only windfall sites provide for the development needs of the borough and thus not all needs may be met.
Option 13: Pre-Submission Local Plan	Following a review of the findings for Strategic Growth Options 1-12, work was undertaken on developing a suitable strategy for the Pre-Submission Local Plan. To undertake this work, consideration of the impact that the range of different scales and distributions had on scores was undertaken. See results sections for an explanation of how this strategy was derived.

6.1.7 To consider the impacts of all these options, further Sustainability Appraisals were carried out, beginning with appraisals of growth strategies 1 - 12. Once this was complete, the findings were reviewed alongside comments made during consultation of the Draft Local Plan, and a new strategy was developed for the Pre-Submission Local Plan (Growth Strategy 13).

6.1.8 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 B). 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.

6.1.9 In addition to alternatives for the development strategy as a whole, alternative options to key elements of the strategic sites were considered as part of the sustainability appraisal. These were alternatives for:

- i. the location for a garden settlement
- ii. the scale of development for a garden settlement
- iii. the location for an urban extension
- iv. the scale of development for an urban extension
- v. the strategic transport links for the above

## 6.2 Results

### **Growth Strategy Reasonable Alternatives**

6.2.1 The sustainability appraisals for each of the reasonable alternatives detailed in Table 12 are shown below in Table 13 - Table 24.

Table 13. SA scores for Growth Strategy 1: No MGB.

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	++	Substantially less development will benefit air quality in the west of the borough especially.
Biodiversity	0 / +	Score reflects the substantial gains planned for land at Tudeley plus reduced pressures on biodiversity overall.
Business Growth	--	Less growth in the borough (and at North Farm especially) would have a negative impact upon overall business growth. Economic needs would not be met.
Climate Change	0 / -	Less growth in the borough would be beneficial to the climate change objective in reducing transport and carbon emissions from new dwellings.
Deprivation	0 / -	Reduced regeneration at Paddock Wood would create a negative impact.
Education	++	This distribution is expected to remain adequate for addressing educational needs.
Employment	--	Score reflects loss of significant future employment sites in RTW and Paddock Wood.
Equality	0 / +	Score reflects fact that less development overall does not necessarily correlate with improvements in physical activity rates or independent access to facilities. Score is lower than that for Growth Strategy 2 as less growth is planned overall so risk that improvements cannot be made as effectively.
Health	0 / -	Score is lower than that for Growth Strategy 2 as substantially less growth is planned overall so risk that improvements cannot be made as effectively.
Heritage	0 / +	Score reflects the reduced pressure on the historic environment.
Housing	---	Substantially reduced development will not be sufficient to meet local housing needs.
Land use	+	Score reflects substantially reduced pressure on greenfield land, soils and complete absence of loss of MGB.
Landscape	0 / -	Score reflects loss of significant sites with negative landscape impacts at Mabledon and Spratsbrook, whilst pressures on AONB elsewhere in Borough remain.
Noise	0 / -	Score improved in comparison with strategies with strategic sites to reflect improvements in road noise from substantially reduced development at PW and Tudeley.
Resources	?	Choice of materials will be determined at Development Management stage.
Services & Facilities	0 / +	Substantially reduced development at Paddock Wood and east Capel will reduce the opportunities for improving services and facilities at this town. The more rural settlements remain unchanged.
Travel	0	Substantially reduced development at RTW, Paddock

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		Wood, east Capel and Tudeley (with associated sustainable transport investments) will not improve easy access to train stations or provide support for transport projects such as at Colts Hill. However, this is offset by substantially reduced volumes of private vehicles.
Waste	0	Objective most relevant to DM policies rather than strategic policies.
Water	-	Score is determined by consideration of reduced pressure on water resources and fact that flooding mitigation at Paddock Wood would no longer be possible.

Table 14. SA scores for Growth Strategy 2: No AONB Majors

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	+	Less development in Hawkhurst and Cranbrook will benefit air quality in these locations. The issue is not diverted elsewhere as quantity of development is reduced.
Biodiversity	+	Nature conservation designations are scattered across the borough but are more common in the AONB. Reducing development here could benefit biodiversity in combination with a strong commitment to net gains.
Business Growth	--	Less growth in the borough (and at North Farm especially) would have a negative impact upon overall business growth. Economic needs would not be met.
Climate Change	- / --	Less growth in the AONB (and in the borough overall) would be beneficial to the climate change objective in reducing transport and carbon emissions from new dwellings.
Deprivation	0	Hawkhurst and Cranbrook are both areas of income deprivation and thus less growth here would mean less opportunity for regeneration. Opportunities would not be realised elsewhere (as for Growth Strategy 8) and thus score is reduced slightly.
Education	++	This distribution is expected to remain adequate for addressing educational needs.
Employment	--	Score reflects loss of significant future employment sites in RTW and Paddock Wood.
Equality	+ / ++	Score reflects fact that less development in AONB settlements does not necessarily correlate with improvements in physical activity rates or independent access to facilities. Score is slightly lower than that for Growth Strategy 8 as less growth is planned overall so risk that improvements cannot be made as effectively.
Health	0	Score reflects fact that less development in AONB settlements does not necessarily correlate with improvements to accessible natural greenspace or pockets of health deprivation. Score is slightly lower than that for Growth Strategy 8 as less growth is planned overall so risk that improvements cannot be made as effectively.
Heritage	0 / -	Score is based upon Growth Strategy 7 and reflects fact that the borough has a wealth of heritage assets that are not confirmed to the AONB. A slight improvement is seen to reflect the reduced pressure from development.
Housing	- / --	Score reflects fact that reduced development will not

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		be sufficient to meet a significant proportion of local housing needs and that building less dwellings in the AONB will not help address the imbalance of higher house prices in the AONB.
Land use	-	Score reflects pressure on soils, greenbelt, and greenfield land.
Landscape	+	Less major development in the AONB will have landscape benefits.
Noise	0 / -	Score improved in comparison with Growth Strategy 7 to reflects AONB settlements of Cranbrook, Lamberhurst and Goudhurst being vulnerable to road noise.
Resources	?	Choice of materials will be determined at Development Management stage.
Services & Facilities	0 / +	Score reduced slightly in relation to Growth Strategy 8 to reflect the fact that reduced development in the AONB would not necessarily help focus growth where services and facilities are available.
Travel	-	Score improved in comparison with Growth Strategy 7. Less development in the AONB will mean fewer private vehicles as much of the designation covers rural areas where alternative transport modes are not popular or viable.
Waste	0	Objective most relevant to DM policies rather than strategic policies.
Water	0 / -	Score is not significantly affected by reduction in growth in the AONB. Reflects risk to flooding in Paddock Wood and overall increased pressure on existing supplies.

Table 15. SA scores for Growth Strategy 3: Draft Local Plan

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	0 / -	Expected overall decline in air quality. However, substantial investment in active and sustainable travel methods will help offset this in urban areas. The master planning approach for the strategic sites will be especially beneficial.
Biodiversity	0	Losses on smaller sites 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. Benefits also highly likely to be realised with master planning of strategic sites.
Heritage	-	Overall a slight negative impact reflecting a balance between the positive effects in Southborough and the smaller negative impacts elsewhere.
Housing	+ + +	Meeting housing need 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 specific site



<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		allocations to influence diversion of household and construction waste from landfill.
Water	?	Meeting housing need 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.

Table 16. SA scores for Growth Strategy 4: Main Towns

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	--	Score unchanged since earlier SA stages to reflect fact that, while the government's recent accelerated agenda for switch to EV and the status of existing AQMA is improving, the situation in Hawkhurst has been deteriorating and this strategy option has the potential to worsen the effect.
Biodiversity	0	Large quantity of development across the borough is highly likely to cause losses for biodiversity. Urban focus may help but brownfield sites are limited. Score has improved since earlier SA stages to reflect strong commitment to a policy for net gains.
Business Growth	+ / ++	Strong focus for development in more urban areas is likely to mean a wider range of suitable staff and transport options. Broadband is more likely to be of a reasonable speed and existing premises are more likely to be available. Score improved since earlier SA stages to reflect inclusion of the A21 corridor as a suitable employment growth area and Article 4 directions that are now in place.
Climate Change	-	Score unchanged since earlier SA stages. Carbon neutrality targets are now in place within the plan period. However, there are no strong guarantees or commitments from central government yet.
Deprivation	++ / +++ +	Pockets of deprivation are concentrated in urban areas. Developing here increases the likelihood that these could be improved. Score is improved since earlier SA stages to reflect inclusion of a PW extension which would represent a substantial form of regeneration in a town with areas of income deprivation.
Education	+	Score updated since earlier SA stages to reflect clarity from KCC Education on where educational needs are greatest in the borough. This distribution would benefit high needs in RTW but neglect needs in the smaller rural settlements. Assumption that future development would address both existing and future educational needs.
Employment	++ / +++ +	New score reflects incorporation of the A21 corridor as being a good location for new employment opportunities and the incorporation of the strategic site at Paddock Wood and east Capel which was not considered at earlier SA stages.
Equality	+	Score downgraded from earlier SA stages. Developing in these locations matches up with pockets of income deprivation and so increases the likelihood that opportunities will be available for improved leisure provision. However, developing predominantly in towns,

Sustainability Objective	Score	Commentary
		ignores the needs of rural residents and provides no opportunity for improvement elsewhere.
Health	+ / + +	Score modified since earlier SA stages to better reflect fact that urban residents are more likely to be within reach of accessible natural greenspace. This was a finding revealed during assessment of the Draft Local Plan SA stage. The score also reflects the commitment made to a new policy that protects Local Green Space.
Heritage	- -	Score deteriorated since earlier SA stages because of influence of additional growth along A21 corridor putting further pressure on sensitive built up areas of RTW. No guarantees for enhancements of the historic environment are made yet.
Housing	+	Score unchanged to reflect the fact this distribution pattern does not address the housing needs in the numerous smaller rural settlements.
Land use	- -	Incorporating the A21 corridor and Paddock Wood and east Capel strategic growth into this option means impacts for MGB are greater and this score has deteriorated since earlier SA stages. However, greenfield losses are avoided elsewhere in the borough. Town focussed growth is more likely to be on brownfield land.
Landscape	- / - -	Score deteriorated since earlier SA stages to reflect incorporation of A21 corridor growth meaning great impact on the AONB.
Noise	- - / - - -	Score deteriorated since earlier SA stages to reflect incorporation of A21 corridor growth meaning great impact on existing noise levels.
Resources	?	Score unchanged. Choice of materials will be determined at Development Management stage.
Services & Facilities	+ +	Score unchanged to reflect distribution pattern focusing on the settlements with the most services and facilities. Addition of the A21 corridor growth is also well placed for access to services and facilities.
Travel	+ / + +	Score improved following incorporation of A21 corridor to reflect likely further support of priority transport projects and the fact the new distribution (including A21) support active and train travel as many services are within easy reach.
Waste	0	Score change from ? to 0 since earlier SA stages to better reflect inability of site allocations to influence diversion of household and construction waster from landfill. Objective most relevant to DM policies rather than strategic policies.
Water	?	Score changed from - to mixed (?) since earlier SA stages so more in line with DLP to reflect inclusion of

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		strategic growth site at PW allowing flood improvements.

Table 17. SA scores for Growth Strategy 5: Main Towns & Large Villages

Sustainability Objective	Score	Commentary
Air	- / - -	Score has improved slightly since earlier SA stages to reflect improving status of the RTW AQMA and government commitments to electric vehicles. Adjustment has also been made to account for slight improvement from distributing development away from problem areas in the main settlements (including the new AQMA at Hawkhurst). Without the master planning work that goes alongside strategic sites some of the beneficial effects of active travel commitments would be lost.
Biodiversity	0	Large quantity of development across the borough is highly likely to cause losses for biodiversity. Urban focus may help but brownfield sites are limited. Score has improved slightly since earlier SA stages to reflect strong commitment to a policy for net gains.
Business Growth	+	Focusing development in more urban towns is likely to mean a wider range of suitable staff and transport options. Broadband is more likely to be of a reasonable speed and existing premises are more likely to be available.
Climate Change	- -	Score is unchanged since earlier SA stages and reflects increase in transport-related carbon as development is focussed less in urban areas with good public and active transport possibilities. Carbon neutrality targets are now in place within the plan period. However, there are no strong guarantees or commitments from central government yet.
Deprivation	+ +	Pockets of deprivation are generally concentrated in urban areas. Developing here increases the likelihood that these could be improved. Score unchanged since earlier SA stages.
Education	+ / + +	Score has been updated since earlier SA stages to reflect clarity from KCC Education on where educational needs are greatest in the borough. This distribution would help benefit high needs in RTW and address needs in the smaller rural settlements to a small extent, but not as much as may be necessary.
Employment	+ +	Score unchanged from earlier SA stages. Employment opportunities are more common in the main urban areas.
Equality	+ / + +	Score changed from + + + at earlier SA stages. Developing in these locations matches up with pockets of income deprivation and so increases the likelihood that opportunities will be available for improved access. However, this ignore the needs of rural residents and provides no opportunity for improvement elsewhere.

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		Score now better reflects the transition between Strategies 4 and 6.
Health	+	Score unchanged from earlier SA stages. Avoiding development in smaller settlements would likely ensure overall good access to green space.
Heritage	- / - -	Focusing on built up areas would put pressure on the historic environment especially in RTW. Score deteriorated from earlier SA stages because of no guarantees for enhancements of the historic environment.
Housing	+ +	Score unchanged since earlier SA stages to reflect this distribution pattern does not addresses the housing needs in the smaller rural settlements.
Land use	- -	Score improved since earlier SA stages. After the Brownfield Register were first published in Dec 2017, it was felt that brownfield land is so limited in the borough that the loss of greenfield land would be similar across growth strategies 4, 5 and 6 rather than deteriorating to reflect increased greenfield land take.
Landscape	- -	Score unchanged since earlier SA stages reflecting sensitivity of settlements within the AONB.
Noise	- -	Score unchanged since earlier SA stages reflecting large proportion of sensitive areas being in RTW where a large proportion of housing would occur.
Resources	?	Score unchanged. Choice of materials will be determined at Development Management stage.
Services & Facilities	+ / + +	Score improved since earlier SA stages to reflect the service focussed distribution and the updated Role and Function Study with more robust methodology.
Travel	-	Score unchanged. As development is diverted away from the main towns, transport options become more limited and private car use begins to dominate, especially Paddock Wood which has good train links.
Waste	0	Score change from ? to 0 since earlier SA stages to better reflect inability of site allocations to influence diversion of household and construction waster from landfill. Objective most relevant to DM policies rather than strategic policies.
Water	-	Score unchanged and reflects risk to flooding in Paddock Wood and east Capel and overall increased pressure on existing supplies.

Table 18. SA scores for Growth Strategy 6: Meet need with no MGB loss

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	0	Option diverts traffic from the problem areas in Hawkhurst and RTW.
Biodiversity	0 / -	Large quantity of development across the borough is highly likely to cause losses for biodiversity. Rural village focus could contribute to this negative affect. Effects are prevented from being any worse by fact that nature conservation sites are more common in the AONB.
Business Growth	0 / +	Focusing development away from more urban towns is likely to mean a narrower range of suitable staff and transport options. Broadband is less likely to be of a reasonable speed and existing premises are less likely to be available. Continued large growth at Paddock Wood is an exception to this.
Climate Change	-- / ---	Score reflects increase in transport-related carbon as development is focussed less in urban areas with good existing public and active transport possibilities. Carbon neutrality targets are now in place within the plan period. However, there are no strong guarantees or commitments from central government yet. Development SE of Paddock Wood may mean the loss on an existing solar farm.
Deprivation	0 / +	Pockets of deprivation are generally concentrated in urban areas. Developing elsewhere reduces the likelihood that these could be improved.
Education	+	This distribution would not benefit the high needs in RTW or help address the needs in some of the smaller rural settlements. Assumption that future development would address both existing and future educational needs.
Employment	+	Score reflects loss of large employment site in RTW. Employment opportunities are more limited when developing outside of main urban centres.
Equality	+	Developing further into rural areas both small villages and outskirts from PW is unlikely to give as much support to access problems as would be possible if development was concentrated in more populated areas.
Health	+	Urban residents are more likely to be within reach of accessible natural greenspace.
Heritage	--	Substantial growth of the small non AONB settlements is expected to have very negative impact upon heritage assets and setting.
Housing	+ / + +	Option is generally positive but is less effective at addressing the housing need in the west of the borough as other options.

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Land use	+	No loss of MGB. Substantial loss of greenfield land and soils.
Landscape	- / - -	Score reflects protection offered to the AONB whilst significant impact upon the character of three smaller non ANOB villages and setting issues of the AONB near Sissinghurst particularly.
Noise	- / - -	Transferring MGB growth into other areas of the borough would improve noise levels in the west but risks creating new problems elsewhere in the borough. Especially near Cranbrook where there are existing Important Areas for Road Noise (IARN).
Resources	?	Unknown. Choice of materials will be determined at Development Management stage.
Services & Facilities	0 / +	Disproportionate growth of the three less constrained villages is not ideal as services are currently lacking. However, some allowances are made for the assumption that some of the necessary infrastructure would be included with the new development.
Travel	- - / - - -	Disproportionately large growth in smaller settlements of Frittenden, Horsmonden and Sissinghurst prompts a high negative score.
Waste	0	Neutral score reflecting inability of site allocations to influence diversion of household and construction waste from landfill.
Water	-	Score unchanged and reflects risk to flooding in Paddock Wood and Capel and overall increased pressure on existing supplies.



Table 19. SA scores for Growth Strategy 7: Proportional to Services

Sustainability Objective	Score	Commentary
Air	0	Score has improved slightly since earlier SA stages to reflect improving status of the RTW AQMA and government commitments to electric vehicles. Adjustment has also been made to account for slight improvement from distributing development away from problem areas in the main settlements (including new AQMA at Hawkhurst).
Biodiversity	0	Large quantity of development across the borough is highly likely to cause losses for biodiversity. Urban focus may help but brownfield sites are limited. Score has improved slightly since earlier SA stages to reflect strong commitment to a policy for net gains.
Business Growth	+	A wider distribution across the borough will reduce support for key businesses based in more urban towns.
Climate Change	--	Score reflects increase in transport-related carbon as development is focussed less in urban areas with good public and active transport possibilities. Score unchanged since earlier SA stages. Carbon neutrality targets are now in place within the plan period. However, there are no strong guarantees or commitments from central government yet. Score is not worse than Growth Strategy 5 as distribution considers services and facilities of settlements, helping to reduce dependency on private car use.
Deprivation	+	Pockets of deprivation are generally concentrated in urban areas. Developing elsewhere reduces the likelihood that these could be improved. Score unchanged since earlier SA stages.
Education	++	Score has been updated since earlier SA stages to reflect clarity from KCC Education on where educational needs are greatest in the borough. This distribution would benefit high needs in RTW and also help to address needs in the smaller rural settlements. Assumption that future development would address both existing and future educational needs.
Employment	+	Score unchanged since earlier SA stages. Employment opportunities are more limited when developing outside of main urban centres.
Equality	++	Score unchanged since earlier SA stages. Developing further into rural areas is unlikely to give as much support to access problems as would be possible if development was concentrated in more populated areas.
Health	0 / +	Score modified since earlier SA stages to better reflect fact that rural residents are less likely to be within reach of accessible natural greenspace. This was a finding

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		revealed during assessment of the Draft Local Plan SA stage.
Heritage	-	Score modified since earlier SA stages as this growth option no longer allocates development to the very smallest settlements where preservation of farmsteads could be possible. Also, there is no guarantee of enhancements for the historic environment.
Housing	+ + +	Score improved since earlier SA stages to reflect this distribution pattern now being enough to address the housing needs in the smaller rural settlements.
Land use	--	Score improved since earlier SA stages. After the Brownfield Register was first published in Dec 2017, it was felt that brownfield land is so limited in the borough that the loss of greenfield land would be similar across growth strategies 4, 5 and 6 rather than deteriorating to reflect increased greenfield land take.
Landscape	--	Score unchanged since earlier SA stages reflecting sensitivity of settlements within the AONB.
Noise	-	Score unchanged and reflects smaller settlements tending not to be near Important Areas for Road Noise (IARN). Negative overall as there is a risk that such large amount of growth would create significant movements in new locations and thus warrant a new IARN.
Resources	?	Score unchanged. Choice of materials will be determined at Development Management stage.
Services & Facilities	+	Score improved since earlier SA stages to reflect the service focussed distribution and the updated Role and Function Study with more robust methodology.
Travel	--	Score unchanged. As development is diverted away from the main towns, transport options become more limited and private car use begins to dominate.
Waste	0	Score change from ? to 0 since earlier SA stages to better reflect inability of site allocations to influence diversion of household and construction waster from landfill. Objective most relevant to DM policies rather than strategic policies.
Water	-	Score unchanged and reflects risk to flooding in Paddock Wood and Capel and overall increased pressure on existing supplies.

Table 20. SA scores for Growth Strategy 8: Services and AONB

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	0 / +	Less development in Hawkhurst and Cranbrook will benefit air quality in these locations.
Biodiversity	0 / +	Nature conservation designations are scattered across the borough but are more common in the AONB. Reducing development here could benefit biodiversity in combination with a strong commitment to net gains.
Business Growth	+	Less growth in the AONB settlements would have a minimal impact upon overall business growth.
Climate Change	--	Score is the same as that than Growth Strategy 7 as reduced growth in the AONB is unlikely to impact significantly upon the carbon intensity of new development or the way in which people travel. In addition, this score is worse than that applied to the DLP to reflect increased travel necessary from greater development in the smaller AONB settlements.
Deprivation	+	Score is the same as that of Growth Strategy 7 as a reduction in growth in Hawkhurst and Cranbrook (both areas of income deprivation) is offset by increase in growth in Southborough, Rusthall and RTW. Growth in areas of income deprivation such as these means greater opportunity for regeneration.
Education	++	Score is unchanged from Growth Strategy 7 as KCC education have not identified high needs in the AONB settlements.
Employment	0 / +	Score reflects likely loss of employment sites at Gills Green.
Equality	++	Score is the same as Growth Strategy 7 and reflects fact that less development in AONB settlements does not necessarily correlate with improvements in physical activity rates or independent access to facilities.
Health	0 / +	Score is the same as Growth Strategy 7 and reflects fact that less development in AONB settlements does not necessarily correlate with improvements to accessible natural greenspace or pockets of health deprivation.
Heritage	-	Score is the same as Growth Strategy 7 and reflects fact that the borough has a wealth of heritage assets that are not confined to the AONB.
Housing	+++	Score assumes that reduced growth in AONB settlements would still be sufficient to meet local needs.
Land use	--	Score assumes that reduced growth in AONB settlements would not necessarily mean less

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		development in the MGB.
Landscape	-	Score assumes that the level of reduced growth would be sufficient to avoid significant impacts upon the AONB and that significant impacts would not be created elsewhere.
Noise	0 / -	Score improved in comparison with Growth Strategy 7 to reflects AONB settlements of Cranbrook, Lamberhurst and Goudhurst being vulnerable to road noise.
Resources	?	Unknown. Choice of materials will be determined at Development Management stage.
Services & Facilities	+	Score is identical to Growth Strategy 7 as this strategy also focusses on growth within settlements that have better provision of services and facilities. Removing some growth from the AONB would not significantly change this score as the growth could be transferred to settlements outside the AONB with similar levels of service provision.
Travel	-	Score improved compared to Growth Strategy 7. Transport options are often limited in the AONB, with private car use dominant.
Waste	0	Objective most relevant to DM policies rather than strategic policies.
Water	-	Score is not significantly affected by reduction in growth in the AONB but reflects risk to flooding in Paddock Wood and overall increased pressure on existing supplies.

Table 21. SA scores for Growth Strategy 9: Dispersed Countryside

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	--	Sustainable and active transport options are limited in a hamlet-style distribution 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.
Biodiversity	-	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. Planning for a higher number of smaller housing developments increases the changes that development will be near to a designated site.
Business Growth	--	Score has been adjusted since Draft Local Plan stage as it was felt that losses to the rural economy (larger fields are more profitable, and farmsteads often provide valuable business premises) had been underestimated. Negative impacts upon the growth of new businesses has also been considered as rural development has poorer transport links and broadband connections.
Climate Change	--	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 contain areas of income deprivation. However, Hamlet style development is highly likely to be on greenfield sites adjoining settlements and is thus unlikely to constitute a form of regeneration or address issues of fuel poverty. In fact, it is clear now
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 requirements of the Local Plan.
Employment	--	Score has been adjusted since Draft Local Plan stage as it was felt that, although jobs in construction would be maintained, this needs to be offset against the lack of provision for employment sites in this strategy. This assumption has become clearer since Draft Local Plan stage.
Equality	-	Extra development on the edge of existing rural settlements is likely to mean independent access to facilities for new residents is more challenging both in

Sustainability Objective	Score	Commentary
		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-style developments.
Health	0 / +	Score modified since earlier SA stages to better reflect fact that urban residents are more likely to be within reach of accessible natural greenspace. This was a finding revealed during assessment of the Draft Local Plan SA stage. The score also reflects the commitment made to a new policy that protects Local Green Space.
Heritage	- / - -	Even if development in the AONB it is distributed evenly, there is potential for conflicts with historic settlement pattern and impact upon designated and non-designated heritage assets. Hamlet-style development will be small and thus have potential to create reduced but still wide-spread impact.
Housing	+	Score has been adjusted since Draft Local Plan stage to better reflect the fact that this strategy for small hamlet-style development would be less likely to meet the threshold for provision of affordable housing.
Land use	- - / - - -	Development would need to be on greenfield land and will result in the loss of soils. In addition, further release of greenbelt land cannot be ruled out.
Landscape	- -	Hamlet-style development will be small scale but the cumulative risks from the volume of development would still have significant landscape impacts.
Noise	-	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 hamlet-style distribution development.
Travel	- - -	Negative score reflects 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 rural nature of the settlements will likely always mean that private car use is preferred.
Waste	0	Neutral score reflecting inability of site allocations to influence diversion of household and construction waste from landfill.

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Water	-	Large development is needed in order to secure the financial contributions needed to make flood betterment viable. The hamlet-style development is less likely to allow for this.

Table 22. SA scores for Growth Strategy 10: Uncapped Need

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	-	The higher quantity of development is likely to result in a deterioration in local air quality related to the higher volume of vehicles.
Biodiversity	0 / -	Greater quantity of development creates more of a risk to biodiversity.
Business Growth	+ / + +	Greater quantity of development means more opportunities for encouraging business growth and competitiveness.
Climate Change	-- / ---	Greater quantity of development increases carbon emissions
Deprivation	+ / + +	Score improved by greater quantity of development to reflect increased opportunities for regeneration.
Education	+ + / + + +	Assumption that future development would address both existing and future educational needs.
Employment	+ / + +	Greater quantity of development would facilities and support employment opportunities to a greater extent.
Equality	+ / + +	Extra development on the edge of existing 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.
Health	?	Unknown score. New development could provide new accessible natural greenspace, provision for higher physical activity rates or better access to heritage assets but this would depend strongly on DM policy.
Heritage	- / --	Greater quantity of development creates more of a risk to the historic environment.
Housing	+ + +	Greater quantity of development distributed across the borough would address housing needs.
Land use	-- / ---	Greater quantity of development creates risk of further loss of greenfield land, soils and MGB.
Landscape	-- / ---	Greater quantity of development creates significant risk to the sensitive landscapes both from individual development and cumulatively.
Noise	- / --	The higher quantity of development is likely to result in an increase in noise levels due to the higher volume of vehicles.
Resources	?	Choice of materials will be determined at Development Management stage.
Services & Facilities	0 / +	Expanding existing settlements is not likely to improve access to and range of key services and facilities.
Travel	--	Increasing the quantity of development would support the viability of bus services but further increasing the size of rural settlements would not decrease likelihood of dependency on private vehicles. Score unchanged



<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		from Growth Strategy 7.
Waste	0	There is a risk that a greater quantum of development could reduce changes of household waste reduction. However, this objective is controlled by effective DM policy so cannot be scores accurately.
Water	?	Increased quantity of development at Paddock Wood and east Capel could help facilitate mitigation schemes as for Growth Strategy 3 so score is unknown.

Table 23. SA scores for Growth Strategy 11: Uncapped Need +

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	- / - -	The higher quantity of development is likely to result in a deterioration in local air quality related to the higher volume of vehicles.
Biodiversity	-	Greater quantity of development creates more of a risk to biodiversity.
Business Growth	+ +	Greater quantity of development means more opportunities for encouraging business growth and competitiveness.
Climate Change	- - -	Greater quantity of development increases carbon emissions
Deprivation	+ +	Score improved by greater quantity of development to reflect increased opportunities for regeneration.
Education	+ + +	Assumption that future development would address both existing and future educational needs.
Employment	+ +	Greater quantity of development would facilities and support employment opportunities to a greater extent.
Equality	+ +	Extra development on the edge of existing 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.
Health	?	Unknown score. New development could provide new accessible natural greenspace, provision for higher physical activity rates or better access to heritage assets but this would depend strongly on DM policy.
Heritage	- -	Greater quantity of development creates more of a risk to the historic environment.
Housing	+ + +	Greater quantity of development distributed across the borough would address housing needs.
Land use	- - -	Greater quantity of development creates risk of further loss of greenfield land, soils and MGB.
Landscape	- - -	Greater quantity of development creates substantial risk to the sensitive landscapes both from individual development and cumulatively.
Noise	- -	The higher quantity of development is likely to result in an increase in noise levels due to the higher volume of vehicles.
Resources	?	Choice of materials will be determined at Development Management stage.
Services & Facilities	0 / +	Expanding existing settlements is not likely to improve access to and range of key services and facilities.
Travel	- -	Increasing the quantity of development would support the viability of bus services but further increasing the size of rural settlements would not decrease likelihood of dependency on private vehicles. Score unchanged

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
		from Growth Strategy 7.
Waste	0	There is a risk that a greater quantum of development could reduce changes of household waste reduction. However, this objective is controlled by effective DM policy so cannot be scores accurately.
Water	?	Increased quantity of development at Paddock Wood and east Capel could help facilitate mitigation schemes as for Growth Strategy 3 so score is unknown.

Table 24. SA scores for Growth Strategy 12: No Local Plan

Sustainability Objective	Score	Commentary
Air	--	Piecemeal development could have a very negative impact on air quality as cumulative impacts are more difficult to consider. Also, small developments unlikely to bring as much opportunity for improvements than a Local Plan with suitable policy.
Biodiversity	--	Greater losses for biodiversity are likely if locations are not strategically planned. Existing policy could be used to protect biodiversity but not as strong as could be.
Business Growth	?	Difficult to score without details of future development proposals or locations. Mixed picture as loss of economic floor is possible but construction activities still likely to be supported as housing still in high demand.
Climate Change	---	Highly negative due to lack of strong energy or transport policies and clear direction from central government still lacking.
Deprivation	--	Without control over where development occurs, there is no guarantee of being able to regenerate in areas of need. There is also no commitment to reducing fuel poverty.
Education	---	New piecemeal development highly unlikely to address existing demands.
Employment	?	Difficult to score without knowledge of future development locations.
Equality	?	Difficult to score without knowledge of future development locations.
Health	?	Difficult to score without knowledge of future development locations.
Heritage	--	Without control over where development occurs, no guarantee of being able to protect historical and cultural heritage assets. A strategic framework for enhancements is less likely to be realised within borough-wide planning.
Housing	+	Some needs would be met but lack of policy direction may reduce drive and certainty for developers.
Land use	--	Location choice in hands of planning applicant. Refusals would be more difficult. Greenfield and soil losses highly likely.
Landscape	--	Much of the borough in in the AONB and of planned development is more likely to put sensitive locations at risk.
Noise	--	Lack of strategic planning may mean Important Areas for Road Noise (IARN) are harder to avoid, as housing demand is so high and cumulative impacts are overlooked at level of individual development.
Resources	--	High demand for housing could mean the demolition approach is adopted as land becomes available instead

Sustainability Objective	Score	Commentary
		of adopting a more proactive approach in which the most suitable land is sought out. Lack of existing DM policy means responsible sourcing of materials is more challenging.
Services & Facilities	?	Difficult to score without knowledge of development location. It is possible that piecemeal development could support rural services by providing a larger population to use such services and create increased demand for expansion. However, likely that preference will be for housing over improvements to facilities, and, even with S106, higher demands could be difficult to adapt to in the short term, which could be detrimental to a service such as a GP practice.
Travel	?	Difficult to score without knowledge of site locations. Uncertain as location of windfall site development is unknown. Sites that have better travel arrangements may be preferred and those without could be improved with S106. However, this tends to be a temporary solution.
Waste	--	There is currently only weak policy relating to waste. Demand for new housing is high.
Water	?	Difficult to score without knowledge of development location.

6.2.2 Following a review of the findings for Strategic Growth Options 1-12, work was undertaken on developing a suitable strategy for the Pre-Submission Local Plan.

6.2.3 To undertake this work, consideration of the impact that the range of different scales and distributions had on scores for the 19 sustainability objectives was undertaken. A summary is provided below. More detailed explanations of how scores were assigned are included in Table 13 to Table 25 above.

### Scale of Development

6.2.4 As would be expected, the scale of development had a significant impact on the scores.

6.2.5 Reducing the amount of development below the existing capped need of 678 dwellings per year, resulted in improvements to some environmental objectives but a deterioration in the scores some economic and social objectives (Growth Strategies 1 and 2). For example, landscape, heritage, biodiversity, air, land use, noise, scores were improved as pressure on land-take eased. However, as more residential and economic development was removed, the objectives of business, housing, employment and deprivation

worsened. Some objectives did not follow this trend. For example, the water score did not improve when the strategic site at Paddock Wood and east Capel was removed due to the large benefits for flooding that would come with this development.

- 6.2.6 As the scale of development was increased towards the uncapped need and beyond (Growth Strategies 11 and 12), the reverse trend was seen. Further benefits were realised for the social and economic objectives and large negative effects were seen for the environmental objectives.
- 6.2.7 The options exploring the scales of growth larger than the existing capped need of 678 dwellings per year resulted in more extreme scores (both positive and negative) whereas the options exploring smaller scales of growth generally resulted in less extreme scores (again, both positive and negative). However, it is not appropriate to conclude that positive effects cancel out negative effects as the importance of each objective needs considering in its own right. Instead, the sustainability appraisal process recognises the interdependence of the three strands of sustainable development and the weight given nationally to the most highly affected environmental objectives and recommended that Growth Strategies 10, 11 and 12 were not pursued further. Thus, Growth Strategies 3 – 9 were considered in more detail to determine how influential the distribution of development could be on enhancing the positive effects and reducing the negative effects that are observed when considering the various scales for development.

## **Distribution of Development**

- 6.2.8 In terms of the distribution of development, it was recognised that greater urban intensification would be beneficial overall with Strategy Option 4 (Main Towns) having several strong positive effects. Potential for further development in urban areas has also been supported by changes to Use Class Order and work undertaken by the Council in 2020 on previously development land (PDL).
- 6.2.9 Greater development in very rural areas via Growth Strategy 9 (Dispersed Countryside) resulted in several highly negatives outcomes and thus was not supported. However, it was observed that scores were improved in comparison to Growth Strategy 4 (Main Towns) where development was directed more closely to settlements with a greater range of services and facilities, and away from some smaller villages, especially Hartley, Sissinghurst and Matfield. The 2020 Role and Function Study provided up-to-date information in this regard.
- 6.2.10 It was also recognised that negative environmental effects were predicted where development was directed to certain settlements; for example, in terms of landscape impacts associated with high growth at Cranbrook and Hawkhurst in Strategy Options 4 and 5 (Main Towns), and that these impacts could be lessened by having a strategy that was sensitive to features such as the AONB, the historic environment and/or biodiversity. This effect was equally realised for objectives that relate to dependency on private car use which is greater in the AONB and smaller villages outside of the AONB.

- 6.2.11 The scoring outcome for Growth Strategy 6 (Meet need with no Green Belt loss) demonstrated that, without Green Belt release, meeting the housing need causes highly negative impacts for travel and climate change and some social objectives are not as positive as they would be otherwise (housing, education, equality).
- 6.2.12 The effects of excluding the strategic sites at both Paddock Wood/east Capel and Tudeley can be explored by comparing Growth Strategies 3 (DLP), with strategies 7 (Proportional to Services) and 8 (Services & AONB). Strong positive scores tend to be more common with Growth Strategy 3, and the advantages of the strategic sites is discussed in the commentary for Growth Strategy 3. There is separate consideration of the choice of these locations for strategic growth on page 85.
- 6.2.13 By comparing Growth Strategies 4 (Main Towns) and 5 (Main Towns & Large Villages), which in effect removes the Paddock Wood/east Capel strategic extension, it was observed that a detrimental impact occurs upon the 8 objectives of business growth, climate change, deprivation, employment, health, services, travel and water. Positive effects were seen for the 6 objectives of air, education, equality, heritage, housing and noise. The remaining 5 objectives of biodiversity, land use, landscape, resources and waste remained constant.
- 6.2.14 The effect of removing Tudeley Village Strategic Site can be observed by comparing Growth Strategies 3 (DLP) and 4 (Main Towns). Ignoring unknown scores, it can be seen that 8 objectives are improved by the distribution including a garden settlement, 2 are made worse and 3 objectives are the same.
- 6.2.15 Finally, the effect of removing both strategic sites can be seen by comparing Growth Strategy 3 (DLP) which meets the standard housing need and include both strategic sites, with Growth Strategies 7 (Proportional to Services) and 8 (Services and AONB) which both meet the standard housing need whilst excluding both strategic sites. When comparing the 12 objectives that are scored negatively or positively (instead of neutral or mixed scores), it can be seen that the 6 objectives of business growth, climate change, deprivation, employment, health and housing objectives all score better when both strategic sites are included in the distribution. The 3 objectives of education, equality, heritage, land use score the same, whilst the 2 objectives of biodiversity and landscape score either the same or worse (depending on whether Strategy 7 or 8 is being used as a comparison). The air quality objective score slightly negatively in Growth Strategy 3 (the DLP) which is worse than the neutral and slightly positive scores for Growth Strategies 7 and 8. The strategic sites are likely to have some effect on the existing AQMAs at Royal Tunbridge Wells and Tonbridge, and because the DLP distribution put pressure on the new AQMA in Hawkhurst. The effect would be more significant if it were not for the extensive active travel proposals for the strategic sites that are expected to bring about a model shift.
- 6.2.16 In conclusion, the objectives for forming a new growth strategy moving forward were to:

- Meet the standard method need
- Include strategic sites as per Growth Strategy 3 (the DLP)
- Include less development at larger settlements of Cranbrook and Hawkhurst in the AONB
- Include reduced development at some smaller villages (especially Sissinghurst, Matfield and Hartley)
- Include more urban intensification, especially in RTW

6.2.17 A sustainability appraisal was then undertaken on this strategy. See Table 25 below. In comparison to the other growth strategies, it can be seen that the Growth Strategy for the Pre-Submission Local Plan strategy is successful in maximising beneficial effects and minimising negative effects (see Table 27).

Table 25. SA scores for Growth Strategy 13: Pre-Submission Local Plan.

Sustainability Objective	Score	Commentary
Air	0 / -	Expected overall decline in air quality. Diverting development away from problem areas in Hawkhurst is offset by more urban intensification in RTW. Substantial investment in active and sustainable travel methods that encourage a modal shift will help lessen this effect.
Biodiversity	0	Small losses offset by potential large gains on strategic sites. Net gains policy will also bring benefits.
Business Growth	++	As for the DLP, 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. Reducing development at some rural settlements will have a benefit for transport-related carbon.
Deprivation	++	Substantial regeneration in areas of income deprivation.
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 are likely 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. Benefits also highly likely to be realised with master planning of strategic sites.
Heritage	-	As for the DLP, there are a number of small negative impacts upon this objective throughout the borough.



<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Housing	+ + +	Strategy will meet standard housing need and local housing needs across the borough.
Land use	- / - -	The addition of a brownfield site and removal of a greenfield site in RTW is beneficial and slightly improves the overall score from that determined at DLP stage. The score represents large losses of greenfield and Green Belt land.
Landscape	-	Reducing development in both large and small AONB settlements will provide a benefit when compared to the DLP.
Noise	-	Sensitive areas are scattered across borough, but many are in RTW where a large proportion of housing would occur. Lamberhurst, Goudhurst and the A229 near Cranbrook also have Important Areas for Road Noise (IARN). However, the smaller villages tend not to be near IARNs so spreading the growth across these locations may help. There is a risk that such large amount of growth would create significant movements in new locations and thus warrant a new IARN.
Resources	?	Choice of materials will be determined at Development Management stage.
Services & Facilities	0 / +	This strategy aligns more closely with the Role and Function study, being led by service provision. It would improve the positive impacts predicted in urban areas, and reduce the negative impacts expected in remote rural areas.
Travel	0 / +	Reducing development at settlements with poorer travel options such as the smaller villages of Matfield and the AONB settlements and increasing development in urban areas especially where train travel is possible, provides a slight benefit to the travel objective. The strategic sites will also be beneficial in supporting a model shift away from private care dependency.
Waste	0	Neutral score reflecting inability of specific site allocations to influence diversion of household and construction waste from landfill.
Water	?	As for DLP, meeting the housing need 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.

Table 26. Overview of scores for the strategic growth options.

Sustainability Objective	1 No MGB	2 No AONB Majors	3 DLP	4 Main Towns	5 Main Towns/ Large Villages	6 Meet need no MGB loss	7 Proporti onal to services	8 Services & AONB	9 Disperse d Country side	10 Uncapped	11 Uncapp ed & Unmet	12 No Plan	13 PSLP
Air	++	+	0/-	--	-/--	0	0	0/+	--	-	-/--	--	0/-
Biodiversity	0/+	+	0	0	0	0/-	0	0/+	-	0/-	-	--	0
Business	--	--	++	+ / ++	+	0/+	+	+	--	+ / ++	++	?	++
Climate	0/-	- / --	- / --	-	--	-- / ---	--	--	--	-- / ---	---	---	-
Deprivation	0/-	0	++	++ / +++	++	0/+	+	+	+	+ / ++	++	--	++
Education	++	++	++	+	+ / ++	+	++	++	++	++ / +++	+++	---	++
Employment	--	--	+++	++ / +++	++	+	+	0/+	--	+ / ++	++	?	+++
Equality	0/+	+ / ++	++	+	+ / ++	+	++	++	-	+ / ++	++	?	++
Health	0/-	0	++	+ / ++	+	+	0/+	0/+	0/+	?	?	?	++
Heritage	0/+	0/-	-	--	- / --	-	-	-	- / --	- / --	--	--	-
Housing	---	-	+++	+	++	+ / ++	+++	+++	+	+++	+++	+	+++
Land use	+	-	--	--	--	+	--	--	-- / ---	-- / ---	---	--	- / --
Landscape	0/-	+	--	--	--	- / --	--	-	--	-- / ---	---	--	-
Noise	0/-	0/-	?	-- / ---	--	- / --	-	0/-	-	- / --	-	--	-
Resources	?	?	?	?	?	?	?	?	?	?	?	--	?
Services	0/+	0/+	?	++	+ / ++	0/+	+	+	---	0/+	0/+	?	0/+
Travel	0	-	?	+ / ++	-	-- / ---	--	-	---	--	--	?	0/+
Waste	0	0	0	0	0	0	0	0	0	0	0	--	0
Water	-	0/-	?	?	-	-	-	-	-	?	?	?	?

## **Strategic Sites**

6.2.18 Accepting that it is clear from this exercise that the Pre-Submission Local Plan is preferable to the alternatives identified, 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
- v. the strategic transport options for the garden settlement and urban extension

6.2.19 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 least negative scores for the environmental pillar.

## **Strategic Site Locations**

6.2.20 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 in Table 27 with an explanation, where applicable, of why options were not considered reasonable to progress to the second assessment stage.

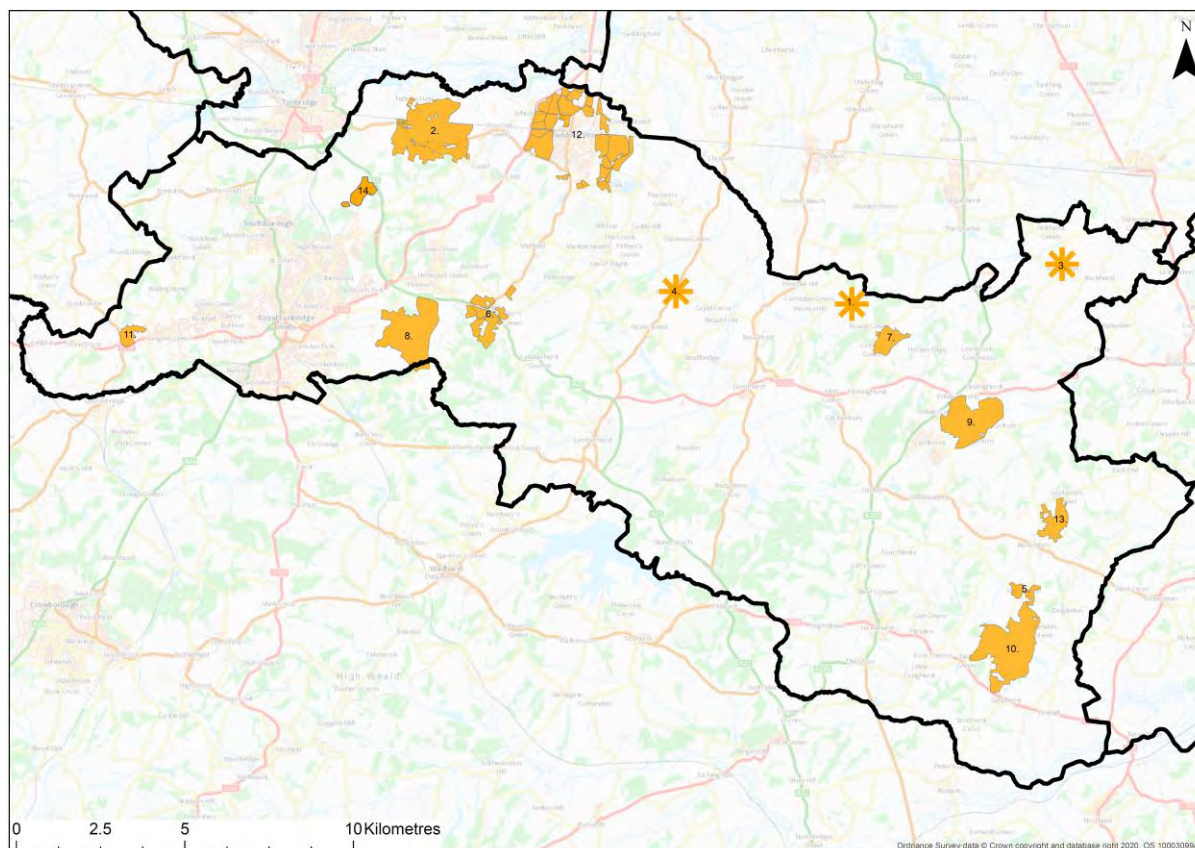


Figure 5. Map of garden settlement options within the Borough. Numbering is explained in Table 27.

Table 27. Garden settlement and urban extension location options considered by this SA.

Ref	Locations Considered	Explanation of approach taken by SA	Progress to second stage?
1	Blantyre House (former prison) Goudhurst Parish	<p>This site was submitted as Site DPC_3 and includes a redundant prison and associated buildings, thus is a brownfield site. It is located outside of the LBD for Goudhurst and outside of the AONB. Location has the benefit of being outside of some key constraints and is within reach of the mainline rail at Staplehurst. However, the site is remote from main settlements with very limited road and other infrastructure. Pedestrian access along the narrow winding rural lanes serving the site is very limited both adjacent to the site and further afield.</p> <p>This site was not considered to merit further assessment as a reasonable alternative for a garden settlement for two reasons. Firstly, the scale of site was too small to meet the minimum 1,500 dwellings required for a garden settlement. Secondly, while a</p>	No

Ref	Locations Considered	Explanation of approach taken by SA	Progress to second stage?
		previously developed site, it is too poorly located in terms of accessibility to be considered suitable for significant residential development.	
2	Capel	<p>Submitted in the call for sites as a combination of site numbers 178, 183, 308, 418, 440, 446, 448, 452, 453 and FS_6.</p> <p>The site is entirely Green Belt and the most recent Green Belt Study concludes the overall harm rating of releasing this land from the Green Belt is high. However, there is scope for compensatory measures such as new hedgerow planting, enhanced pedestrian routes or conversion of fields from arable to grassland.</p> <p>Apart from this, the land is largely outside of key constraints such as the AONB and flood zones and has potential for good road and rail transport links to London and the larger settlements of Tonbridge and Paddock Wood. Cycle and pedestrian links to either of the latter were felt to be possible. Additionally, the total area of the sites combined would be sufficient to provide many services and facilities within the settlement, thus reducing the need for regular travel to other centres. For these reasons, this site was considered to be worthy of further examination.</p> <p>NB. Site 178 was in Flood zone 3 and not well related to the other sites and so was not deemed to be a reasonable alternative.</p>	Yes
3	Frittenden	<p>Location has the benefit of being outside of key constraints, notably the Green Belt as well as the High Weald AONB, and is not distant from Headcorn which provides a mainline rail link to London.</p> <p>However, Frittenden itself is a small village with only very limited services and facilities. The nearest settlements are small towns or villages (Staplehurst, Headcorn and Biddenden) and so it is likely that residents would need to travel further afield for many day-to-day needs, secondary education and employment. The very rural location means direct transport links to main settlements and transport hubs are lacking. The existing road network consists only of minor roads and rural lanes and would require substantial investment.</p>	No

Ref	Locations Considered	Explanation of approach taken by SA	Progress to second stage?
		For these reasons, this location was not considered to be capable of being a sustainable option for a new, or substantially new, settlement.	
4	Horsmonden	<p>Horsmonden was considered as it is an established village outside the High Weald AONB and the Green Belt. Furthermore, a location was submitted in the call for sites, as site 144.</p> <p>This option would involve a substantial increase in Horsmonden applying garden settlement principles. Landscape sensitivity would require further consideration because the site is adjacent to (although outside) the AONB.</p> <p>The submitted site does not envelope the existing settlement and thus would not relate well to the existing village, with impacts on local character and heritage highly likely. Areas of flood zone 3 on the site would also need consideration.</p> <p>More generally, the only main settlement within reach is Paddock Wood, access to which was considered to be difficult, along unclassified roads and through smaller settlements, to the extent that such substantial development would be unlikely to be supported by suitable transport infrastructure.</p> <p>(NB Its potential to make a lesser, but still material, contribution to meeting housing needs was noted and taken into account in the assessment of non-strategic site options.)</p>	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 further consideration as a reasonable alternative.	No
6	Kippings Cross East of Pembury and adjacent to the northern and southern	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 the landscape impacts were considered too severe to warrant further consideration as a reasonable alternative.	No

Ref	Locations Considered	Explanation of approach taken by SA	Progress to second stage?
	carriageways of the A21		
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 AONB were considered too severe to warrant further 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 further 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 further 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 further 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 and DPC21. 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 further consideration as a reasonable alternative.	No
12	Land in Paddock Wood and Capel surrounding existing settlement at Paddock Wood	Submitted in the call for sites as a combination of site numbers 20, 47, 51, 79, 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, 52, DPC_1, DPC_6, DPC_8, DPC_17 and DPC_19.  Land is outside of the AONB and has useful rail and road transport links. There is potential for the existing town to benefit from the substantial investment that new development would bring including resolution of existing flooding problems.  The site is partially Green Belt and the most recent	Yes

Ref	Locations Considered	Explanation of approach taken by SA	Progress to second stage?
		<p>Green Belt Study concludes the overall harm rating of releasing this land from the Green Belt is high. However, there is scope for compensatory measures such as new hedgerow planting, enhanced pedestrian routes or conversion of fields from arable to grassland.</p> <p>For these reasons, this site was considered to warrant further examination as a reasonable alternative.</p>	
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 further consideration as a reasonable alternative.	No
14	Castle Hill	<p>Submitted in the call for sites as site 49 or DPC 7. This site was originally considered as potential development site within Capel Parish in line with those described in Chapter 8 and was filtered out at the first stage assessment (see 8.1). This consideration was based on a potential residential yield of 488-976 dwellings.</p> <p>Since this time, the council has been informed of the potential for greater capacity on this site (up to 1,600 dwellings) and so the site now warrants consideration amongst the sites in this table as a potential garden settlement.</p> <p>To this end, the site is within the AONB and landscape impacts were considered too severe to warrant further consideration as a reasonable alternative.</p>	No

6.2.21 As can be seen from Table 27, the two options deemed appropriate for further appraisal were the larger areas of land submitted in Capel parish and Paddock Wood. As an existing established settlement, it was logical to assess Paddock Wood (with land in east Capel) for a potential urban expansion and especially because the other, larger settlements of RTW, Southborough, Hawkhurst and Cranbrook have many constraints. Similarly, while in the Green Belt, the otherwise largely constraint-free area of land in an accessible location in Capel parish was reasonable to assess as a potential garden settlement location. In both Paddock Wood and Capel, the two key considerations are Green Belt and flood risk - with the potential to generate improvements to existing flood risks.

6.2.22 The main reasons for not considering the remaining options further were severe landscape concerns, mainly linked to impacts on the High Weald AONB, and/or transport concerns making access to the nearest main



settlements very difficult (especially active modes of transport).

- 6.2.23 In terms of AONB landscape issues, the severe impacts cited as being a reason for not considering locations/sites further reflect a combination of the importance of the AONB designation in both legislation and national policy, the particular characteristics of the High Weald AONB, and the circumstances of the respective locations/sites.
- 6.2.24 Of note, while AONB designation does not of itself rule out 'major' growth, this should still be exceptional and, overall, the NPPF sets out that the scale and extent of development in AONBs should be 'limited' (paragraph 172). Indeed, the PPG further states that policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas (Paragraph: 041 Reference ID: 8-041-20190721).
- 6.2.25 The High Weald AONB's value and special qualities are set out in its current Management Plan. It is described as a 'small-scale' landscape, having a dispersed settlement pattern. Indeed, its Statement of Significance notes the 'Absence of large scale urban extensions, after AONB designation in 1983' as a Key Characteristic in relation to the Settlement component of character.
- 6.2.26 Almost inevitably, it is found that large tracts of land in particular make important contributions to the landscape and scenic beauty of the AONB.
- 6.2.27 In all of the circumstances reviewed, none of the locations/sites in the AONB are regarded as capable of providing the requisite justification for identification for strategic growth in the context of the weight to be given to the landscape objective in the context of overall sustainability objectives.
- 6.2.28 (NB Notwithstanding the above conclusions, further consideration is given to potential smaller scale, but still 'major', developments in relation to a number of settlements below.)
- 6.2.29 In terms of accessibility, regard has been given to the likely number and length of journeys for work, shopping, education, leisure and other activities. Both existing access by respective modes and the reasonable potential for improvements to transport infrastructure are considered. Access by active travel modes and public transport have been duly weighed, while recognising rural locations in particular will still have a high reliance on the car.

### **Garden Settlement Development Scale**

- 6.2.30 At Draft Local Plan stage, two scales of development were identified in Capel, both of which centred on Tudeley village.
- 6.2.31 One option was for a maximum of 2,800 dwellings straddling the railway line and the other option was for development of approximately 5,000 dwellings following the same pattern but extending southwards where land is not constrained by Flood Zone 3 but is in the AONB and Green Belt.

6.2.32 To address concerns raised following consultation in Autumn 2019, it was felt appropriate to assess an additional, smaller option for the development of approximately 1,500 dwellings to south of the railway line and in line with the minimum advocated size of a garden settlement. This smaller option is now referred to as 'Option 1', with Options 2 and 3 referring to the options of increasing scale.

6.2.33 A further option of 1,500 dwellings north of the railway line was not considered because it was felt unlikely to be viable from an accessibility standpoint.

6.2.34 All three options are shown in Figure 6 and the sustainability appraisal findings are presented in Table 28.

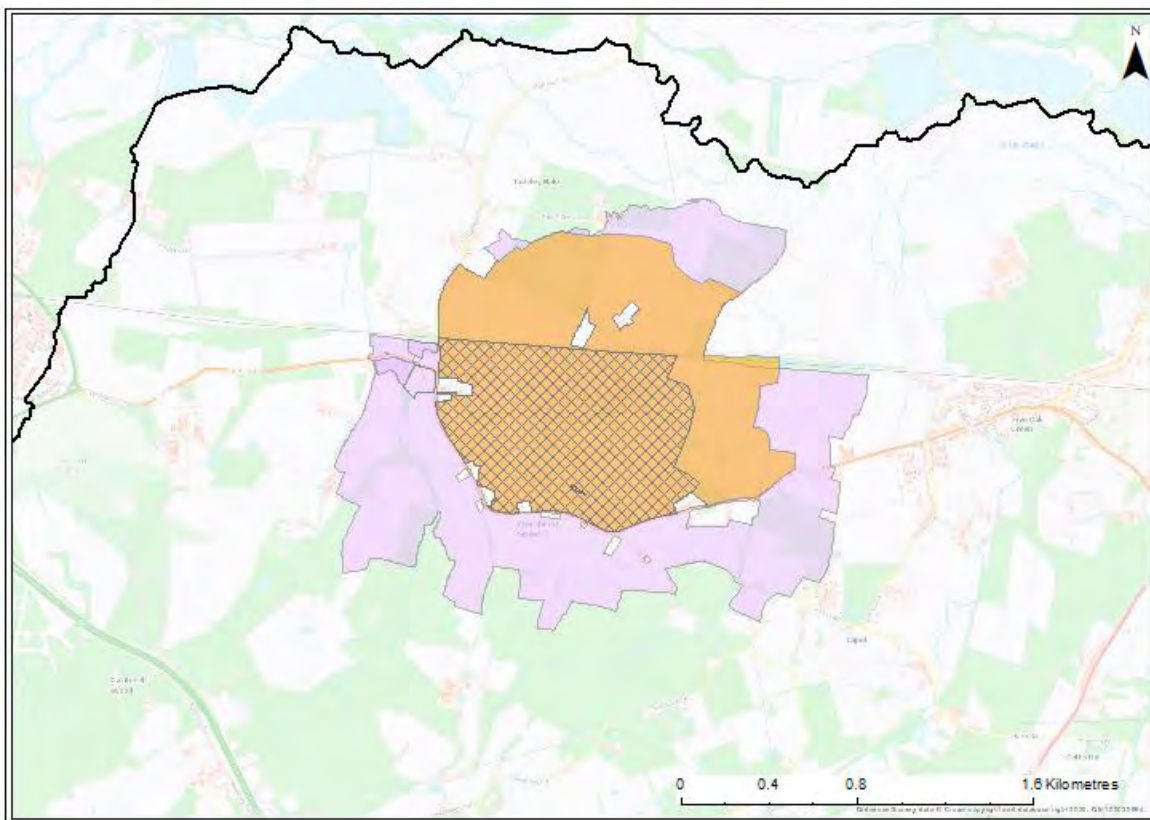


Figure 6. Map of growth options 1 (hatch), 2 (orange) and 3 (purple) for a garden settlement in Capel Parish.

Table 28. SA scores for the two alternative scales of growth of a garden settlement in Capel Parish.

See paragraph 6.2.31 for descriptions.

<b>Sustainability Objective</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>Commentary</b>
Air	?	?	?	Air quality is given a mixed score. All options pose a high risk to deterioration of local air quality, with impacts worsening with increasing scale. Traffic would increase substantially for all options and movement of vehicles into Royal Tunbridge Wells via the A26 (existing AQMA) is likely. Likewise, a worsening of the AQMA on Tonbridge High Street must be considered (cross boundary impacts). Conversely, master planning would ensure the new settlement is designed to discourage private car use with active and shared transport options given priority. This would bring large benefits which would improve with increasing scale.
Biodiversity	0 / -	0 / -	-	Biodiversity constraints such as designated sites are limited. Undesignated habitat such as hedgerows and ponds are likely to be impacted, although a strong commitment to net gains would lessen impacts in the long term. There is no significant risk to Ashdown Forest and no option is within an SSSI Impact Risk Zone. Scores are applied to reflect the constraints in the south (LWS and ancient woodland). Option 1 avoids some ancient woodland to the east but not all so, even with a 30 m buffer, score remains negative overall. The scores depend heavily on the successful implementation of net gains and would be more negative without this policy.
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. Higher scores

<b>Sustainability Objective</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>Commentary</b>
				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 would continue to meet this demand.
Employment	++	++	++	All options would benefit from new employment space and job creation, which would offset the loss of agricultural jobs from development on agricultural land. However, Capel is not a key ward for a focus on employment so maximum scores cannot be applied.
Equality	++ / +++	++ / +++	++ / +++	Equality scores are positive for all options with access to facilities for those with impairments felt to be possible with a strong master planning approach.
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 3 out of 5 Accessible Natural Greenspace Standards. It was also felt likely that the proposals for all options would include provision for elderly care services and improvements to accessible greenspace as opposed to existing greenspace which is largely privately owned.
Heritage	--	--	--	Heritage scores have been updated since Draft Local Plan stage to reflect additional assessment work carried out in 2020 especially regarding All Saints Church. All three scales of settlement would have similar significant effects on the setting of this both this heritage asset and others south of the railway line (e.g. Grove Cottage farmstead). 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 homes. Despite offering varying quantities of new dwellings, the options are not differentiated on this objective because the number of dwellings would still make a significant difference.
Land use	--	-- / -	---	Substantial loss of greenfield and Green Belt

Sustainability Objective	1	2	3	Commentary
		--		land (albeit with compensation elsewhere) with Best and Most Versatile soils causes all options to be scored negatively for land use. Scores reflect scale of development and Option 3 is slightly worse as release of Green Belt would tend to create coalescence with Five Oak Green. Green Belt release is described as having a harm rating of High.
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 Green Infrastructure (GI) exist. In Options 1 and 2, development on high ground next to the B2017 creates particular risk to the AONB setting (predictions reinforced by 2020 AONB setting report). Option 3 encroaches into the AONB and so scores highly negatively.
Noise	-	- / --	--	Noise scores reflect the varying scale of development across the options and the location of development adjacent to the railway line.
Resources	0 / +	0 / +	0 / +	Minimal demolition would be necessary to facilitate all options. Choice of materials would be determined at Development Management stage. Master-planning approach for a large development and strong sustainability credentials expected as part of policy wording makes responsible sourcing of materials more likely.
Services & Facilities	+++	+++	++ / +++	The Services and Facilities objective scores positively for all 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 town centres. However, option 3 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 with consideration of new bus routes and the relatively easy access to train stations.
Waste	0	0	0	Waste reduction and diversion of waste from landfill is outside of the scope of all options.
Water	+ / ?	++ / ?	?	A mixed/positive water scores is applied to options 1 and 2 as they would represent a

Sustainability Objective	1	2	3	Commentary
				substantial demand for water and wastewater treatment whilst also providing 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 options 2 and 3. Option 3 would put additional strain on resources without any further improvement to flooding and thus is scores as mixed overall.

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

- All options score positively for the economic objectives (with Business Growth in Option 3 scoring slightly better to reflect the scale of the development). Option 3 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 more central facilities.
- the environmental objectives scores are more variable with the majority scoring negative (6 objectives). A further two objectives score as mixed and there is 1 neutral objective and one positive objective. Negative scores are a factor of the large scale of development and thus generally score more poorly for Option 3.
- the social objectives are scored positively and the same across all

6.2.36 For all options, environmental protection conflicts with economic and social growth, and negative impacts are lessened by developing a garden settlement that is at a smaller scale. The very severe environmental impacts identified for Option 3, call into question the suitability of this Option. It is also noted that the downside of Option 1 is that smaller contributions would be available for improvements in flood risk elsewhere.

## Urban Extension Development Scale

6.2.37 In Paddock Wood and east Capel, five 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). In order to assess cumulative impacts, the sustainability appraisal has also assessed dwellings being built as part of the SALP.

6.2.38 It is noted that the options have been decreased by 500 dwellings across all

options since the Draft Local Plan stage to reflect the findings of the master-planning process which is now underway.

- 6.2.39 Option 1 was for the development of approximately 1,500 new dwellings (plus the 1,000 dwellings from the existing SALP sites) without any land take within the Green Belt. Growth here is limited by the borough boundary and the extensive areas of flood zone 3.
- 6.2.40 Option 2 was for development of approximately 3,500 (plus the 1,000 dwellings from the existing SALP sites) dwellings following the same pattern as Option 1 with an additional extension of development westwards into the Capel parish Green Belt and allowing for flood relief work to the town.
- 6.2.41 Option 3 was for approximately 2,500 dwellings (plus the 1,000 dwellings from the existing SALP sites) 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.
- 6.2.42 Option 4 was for approximately 4,500 dwellings (plus the 1,000 dwellings from the existing SALP sites) following the same pattern as Option 1 but extending both westwards and southwards more than doubling the size of Paddock Wood.
- 6.2.43 Option 5 was for approximately 2,500 dwellings (plus the 1,000 dwellings from the existing SALP sites) following the same pattern as Option 1 but extending eastwards instead of westwards into land that is not ruled out by constraints such as AONB, Green Belt, flood risk and ancient woodland.
- 6.2.44 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.
- 6.2.45 The sustainability appraisals for these five options are shown below in Table 29.



Figure 7. Map of urban extension options for Paddock Wood including land in east Capel (part 1 of 2).



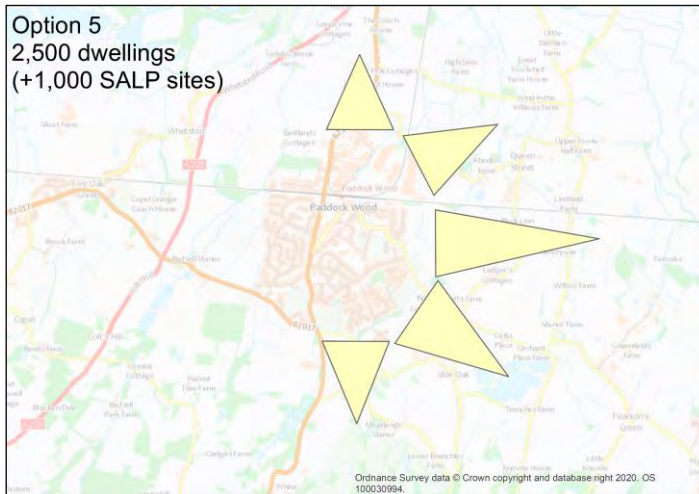


Figure 8. Map of urban extension options for Paddock Wood including land in east Capel (part 2 of 2).

Table 29. SA scores for the four urban extension growth options at Paddock Wood including land in east Capel.

See paragraphs 6.2.39 to 6.2.42 for descriptions.

Sustainability Objective	Option 1	Option 2	Option 3	Option 4	Option 5	Commentary
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 would increase substantially with all options and improvements to the road network at Colts Hill would be important for Option 2 and critical for Option 4. Conversely, active and shared transport options would be given large investments and significant betterment could be seen. However, the improvements would always be working within the confines of Paddock Wood town so can never be given the maximum scores.
Biodiversity	0 / -	0 / -	-	0 / -	0 / -	Generally, biodiversity constraints are limited. There is no risk to the Ashdown Forest and there are 5km SSSI risk zones to the south and north east of the town. Scores are applied to reflect the scale of development, the slight potential for enhancements in the west (existing fields are very large with intensive arable uses and hedgerows are currently more depleted than those on other sides of PW) 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.

Sustainability Objective	Option 1	Option 2	Option 3	Option 4	Option 5	Commentary
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 would continue to meet this demand.
Employment	++	++	++	++	++	Paddock Wood does not currently have low employment levels so is not a key ward for a focus on employment. However, all options would 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 2-3km distance to the town centre for new residents in the south of development options 3, 4 and 5 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

Sustainability Objective	Option 1	Option 2	Option 3	Option 4	Option 5	Commentary
						on this objective because, even the option with the lowest numbers would 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 with overall harm rating of High.
Landscape	-	- / -- --	--	--	- / -- --	Landscape scores follow a similar pattern to heritage reflecting encroachment into the High Weald Character Area in the south. 2020 AONB setting report reinforces the more negative scores for Options 3 and 4 which have potential to adversely affect the AONB by extended development further south, and to a slightly lesser extent Option 5 through extensions to the east which would be visible from the 'Millennium Viewing Point' to the north of Matfield. Option 2 score has been worsened slightly since Draft Local Plans as a result of consultation exercise and to better reflect the scale of development.
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 / + +	0 / + +	Minimal demolition would be necessary to facilitate any of the options. Choice of materials would be determined at Development Management stage. Master-planning approach for a large development and strong sustainability credentials expected as part of policy wording makes responsible sourcing of materials more likely. Impact on Superficial Sub-Alluvial River Terrace deposits would require investigation.
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, 4 and 5 are given lower scores to reflect the piecemeal development in the south and east (around ancient woodland and flood zone 3) rendering new residents quite distant from Paddock Wood town.
Travel	+	+	+	+	+	Travel scores are applied following a similar logic to air quality.

Sustainability Objective	Option 1	Option 2	Option 3	Option 4	Option 5	Commentary
Waste	0	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 and Capel 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 (in east Capel). 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.

6.2.46 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 five options with more piecemeal in the south and east meaning some residents may be outside of desirable walking distances to the central facilities.
- most of the environmental objectives score 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 (including land in Capel parish) and the opportunities or constraints the development positions provide.
- 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 five options with more piecemeal development in the south and east meaning some residents may be outside of desirable walking distances to the central facilities.

6.2.47 As for Tudeley Village, environmental protection conflicts with economic and

social growth in all options and adverse impacts are reduced by developing an urban extension 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 mixed benefits from the water objective), and 5 objectives that score more negatively than Option 1 (reflecting development scales and locations).

6.2.48 Ultimately, the scale of development at Paddock Wood and east Capel was not differentiated for the housing objective across the four options in the SA as all options would make substantial contributions. It is noted that housing is of great importance in meeting targets and options that not only meet targets but also improve the flood risk for existing residents will be highly weighted. The channel realignment needed to improve flood risk is on land in the west and thus cannot be implemented in Option 1.

6.2.49 Drawing on the above draft findings and other, more detailed assessments, which point towards Option 2 being favoured, further consideration is given to related transport infrastructure below.

## **Strategic Transport Options**

6.2.50 In order to successfully deliver the strategic sites, highways and infrastructure assessments demonstrate that improvements to the transport network would be required. This included consideration of:

- The A228 between B2017 and Maidstone Road Pembury junctions
- Links from Tudeley Village east to the A228
- Links from Tudeley Village west to Tonbridge
- Links from Paddock Wood and east Capel Urban Extension west onto the adjacent A228

6.2.51 The options to deliver these are listed below in Table 30. The accompanying SA scores are shown in Table 31 to Table 34.

Table 30. Transport network improvement options serving the strategic sites considered by the SA.

Options are considered for the A228 alone (1), east of the garden settlement (2), west of the garden settlement (3) and west of the urban extension (4).

Ref	Improvement Considered	Explanation of approach taken by SA	Progress to second stage?
1a	A228 Strategic Link which by-passes Colts Hill.	<p>This route has been through detailed optioneering work by Kent Highways and has been safeguarded since 2006 to address existing problems with highway safety and peak congestion and formed a draft policy in the Draft Local Plan.</p> <p>The route would be located west of the existing carriageway on old orchard. It would involve substantial land take and avoids negative impacts on heritage assets along the existing carriageway.</p> <p>The route allows for a minimum 30m buffer for pockets of ancient woodland. Approximately 2/3<sup>rd</sup> of the route is within the AONB and the route is on grade 2 and 3 agricultural soils.</p> <p>There are far reaching views to the west and the route is within the Green Belt.</p>	Yes
1b	Colts Hill online improvements including offline loop and new roundabout	<p>This option includes widening of the existing carriageway in problem areas and an offline loop around an existing cluster of dwellings north of Alders Road.</p> <p>Demolition of an existing derelict building would be necessary. The offline loop allows for a minimum 30m buffer for pockets of ancient woodland, is on grade 3 agricultural soils and adjacent to the AONB border to the south. There would be some loss of roadside trees.</p> <p>There are far reaching views to the west and the improvements and offline loop are within the Green Belt.</p>	Yes
1c	Colts Hill online improvements	<p>This option includes widening of the existing carriageway in problem areas.</p> <p>There are far reaching views to the west and the improvements are within the Green Belt.</p>	Yes

Ref	Improvement Considered	Explanation of approach taken by SA	Progress to second stage?
2a	Online improvements to existing road network	This option would involve widening Alders Road which is a single carriageway rural lane. It would require substantial loss of trees and hedgerows which currently act as the border to the AONB. The road is within the Green Belt and crosses a section of flood zone 2 and 3.	Yes
2b	New carriageway from Five Oak Green to the A228 via an offline A228 loop around the hamlet north of the Alders Rd junction	<p>This option involves the creation of approximately 2.2km carriageway (including the hamlet loop).</p> <p>The route is likely to require a new bridge to be built to traverse Alders Stream and an existing area of flood zone 2 and 3 and is unlikely to be a risk to any sites designated for biodiversity interest but does represent non designated habitat severance. The majority of the new carriageway would be on grade 2 agricultural soils.</p> <p>The AONB is approximately 500m south and setting/boundary issues may be present.</p> <p>There are far reaching views to the west and the route is within the Green Belt.</p>	Yes
2c	New carriageway from Five Oak Green which connects directly to the A228	<p>This option involves the creation of approximately 1.8km carriageway.</p> <p>The route is likely to require a new bridge to be built to traverse Alders Stream and an existing area of flood zone 2 and 3 and is unlikely to be a risk to any sites designated for biodiversity interest but does represent non designated habitat severance. The majority of the new carriageway would be on grade 2 agricultural soils.</p> <p>The AONB is approximately 500m south and setting/boundary issues may be present.</p> <p>There are far reaching views to the west and the route is within the Green Belt. There is a grade II listed building in the hamlet north of the Alders Road Junction (Colts Hill Farmhouse).</p>	Yes



Ref	Improvement Considered	Explanation of approach taken by SA	Progress to second stage?
2d	New carriageway from A228 to north of Tudeley Village	<p>This option would involve the creation of a carriageway of approximately 2.7km that travels north of the railway to reach the northern portion of the garden settlement. The route is within the Green Belt.</p> <p>The majority of this route would be in flood zone 3.</p>	Yes
3	Online improvements to B2017	<p>This option involves widening to allow for buses and upgrading the junction with Hartlake Road and the A26.</p> <p>The route is reasonably direct and avoids existing constraints, although there may be some loss of roadside hedgerows and trees. No further reasonable alternatives were identified that could avoid existing constraints (ancient woodland).</p>	Yes
4	Online improvements to existing highway network	<p>This option involves upgrading the junction of the A228 with the B2160, upgrading the single lane links around the urban extension, upgrading the junction between the B2017 and the B2160.</p> <p>No further reasonable alternatives were identified.</p>	Yes

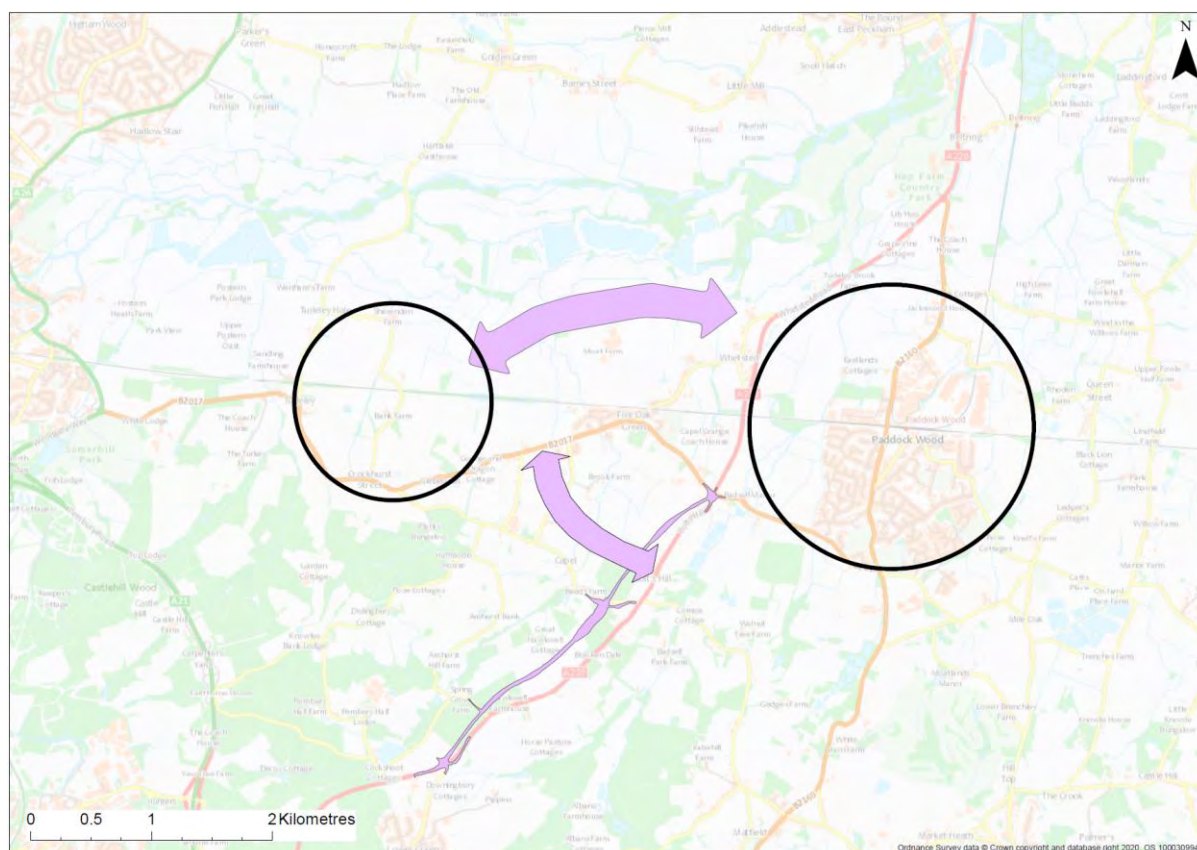


Figure 9. Transport options for the strategic sites.

Table 31. SA scores for the two alternative approaches to addressing existing and future highways safety and peak congestion on the A228. See Table 30 for description of each approach.

<b>Sustainability Objective</b>	<b>1a</b>	<b>1b</b>	<b>1c</b>	<b>Commentary</b>
Air	0 / +	0 / +	0 / +	All options capable of delivering improvements.
Biodiversity	- -	0 / -	0 / -	Reduced land take for option 1b and 1c but still some loss of roadside hedges and trees.
Business Growth	0 / +	0 / +	0 / +	Improved since Draft Local Plan stage to better reflect likely benefit to local businesses of reduced congestion.
Climate Change	?	?	?	Mixed score. Improved congestion will reduce idling but also encourage faster speeds.
Deprivation	0	0	0	No direct impact.
Education	0	0	0	No direct impact.
Employment	+	0 / +	0 / +	1a offers greatest opportunity for jobs in construction.
Equality	0	0	0	No direct impact.
Health	0	0	0	No direct impact.
Heritage	-	0 / -	-	Reduced land take for options 1b and 1c.

<b>Sustainability Objective</b>	<b>1a</b>	<b>1b</b>	<b>1c</b>	<b>Commentary</b>
				Option 1c is likely to cause harm to a heritage asset (Grade II listed building).
Housing	0	0	0	No direct impact.
Land use	--	-	0 / -	Reduced land take for options 1b and 1c.
Landscape	--	-	-	All options within or adjacent to the AONB.
Noise	+ / + +	+	0 / +	All are likely to bring benefits as will involve resurfacing. 1b and 1c would have lower speeds but be nearer existing dwellings.
Resources	0 / ?	0 / ?	0 / ?	Demolition required is for a redundant building.
Services & Facilities	0	0	0	No direct impact.
Travel	+++	+ / + +	+	Improvement inherent to each option. Option 1a likely to be most successful solution for all transport modes.
Waste	0	0	0	No direct impact.
Water	0	0	0	No direct impact.

Table 32. SA scores for the four alternative approaches to facilitate transport links from Tudeley Village east to the A228.

See Table 30 for description of each approach.

<b>Sustainability Objective</b>	<b>2a</b>	<b>2b</b>	<b>2c</b>	<b>2d</b>	<b>Commentary</b>
Air	0 / +	+	0 / +	+	All options capable of delivering improvements. Options 2b and 2d would divert traffic around the A228 hamlet. Lack of sensitive receptors here prevents the score deteriorating further.
Biodiversity	--	- / --	- / --	--	Scores reflect the necessary land take and loss of non-designated habitats. Option 2a would require substantial loss of roadside trees and hedgerows. Options 2b, 2c and 2d are predominantly arable land.
Business Growth	0	0	0	0	Improvements would facilitate increased growth only. There are no significant existing congestion problems that are preventing business growth.
Climate Change	?	?	?	?	Mixed score. Improved congestion will reduce idling but also encourage faster speeds.
Deprivation	0	0	0	0	No direct impact.
Education	0	0	0	0	No direct impact.
Employment	0 / +	+	+	+	2a offers least opportunity for jobs in construction as is a simpler solution with no new carriageway to be constructed.
Equality	0	0	0	0	No direct impact.
Health	0	0	0	0	No direct impact.
Heritage	- / --	-	- / --	-	Options 2a and 2c are more likely to have a direct effect on the setting of heritage assets (listed buildings and historic farmsteads).
Housing	0	0	0	0	No direct impact.
Land use	0 / -	- / --	- / --	--	All options within MGB. Reduced land take for option 2a. Option 2b, 2c and 2d are likely to affect grade 2 soils
Landscape	0 / -	- / --	- / --	- / --	Impacts worsen closer to the AONB in the south and with the increased land take.
Noise	0 / -	0 / +	0 / +	0 / +	2a offers less opportunity for improvement as new surfacing is unlikely to be installed. Option 2b, 2c and 2d divert traffic away from quiet rural lanes.
Resources	0 / ?	0 / ?	0 / ?	0 / ?	Demolition likely to be avoidable.
Services & Facilities	0	0	0	0	No direct impact.
Travel	+ / +	+++	+ / +	+ / +	Improvement inherent to all options. 2b

<b>Sustainability Objective</b>	<b>2a</b>	<b>2b</b>	<b>2c</b>	<b>2d</b>	<b>Commentary</b>
	+		+	+	likely to be more successful solution for all transport modes (redundant carriageway at hamlet can be devoted to active travel).
Waste	0	0	0	0	No direct impact.
Water	0 / -	0 / -	0 / -	- - -	All options present risk to flooding. 2d is almost entirely within Flood zone 2 and 3.

Table 33. SA scores for the proposed transport links improvements from Tudeley Village west to Tonbridge.

See Table 30 for description (Ref 3).

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	0 / +	Widening will prevent congestion.
Biodiversity	0 / -	Some loss of roadside hedges and trees is likely.
Business Growth	0	Improvements would facilitate increased growth only. There are no significant existing congestion problems that are preventing business growth.
Climate Change	?	Mixed score. Improved congestion will reduce idling but also encourage faster speeds.
Deprivation	0	No direct impact.
Education	0	No direct impact.
Employment	0 / +	Temporary jobs during construction phase only.
Equality	0	No direct impact.
Health	0	No direct impact.
Heritage	0	No significant impacts.
Housing	0	No direct impact.
Land use	0 / -	Small loss of MGB land, greenfield and soils
Landscape	0 / -	Minor impact on local character
Noise	0	No significant impact.
Resources	0	No significant impact.
Services & Facilities	0	No direct impact.
Travel	+ / + +	Improvements inherent in design.
Waste	0	No direct impact.
Water	0	No direct impact.

Table 34. SA scores for the proposed transport links improvements from Paddock Wood and east Capel urban extension west to the adjacent A228.

See Table 30 for description (Ref 4).

<b>Sustainability Objective</b>	<b>Score</b>	<b>Commentary</b>
Air	0 / +	Improvements will prevent congestion.
Biodiversity	0	No significant impacts
Business Growth	0 / +	Improved since Draft Local Plan stage to better reflect likely benefit to local businesses of reduced congestion.
Climate Change	?	Mixed score. Improved congestion will reduce idling but also encourage faster speeds.
Deprivation	0	No direct impact.
Education	0	No direct impact.
Employment	0 / +	Temporary jobs during construction phase only.
Equality	0	No direct impact.
Health	0	No direct impact.
Heritage	0	No significant impacts.
Housing	0	No direct impact.
Land use	0 / -	Small loss of MGB land, greenfield and soils
Landscape	0 / -	Minor impact on local character
Noise	0	No significant impact.
Resources	0	No significant impact.
Services & Facilities	0	No direct impact.
Travel	+ / + +	Improvements inherent in design.
Waste	0	No direct impact.
Water	0	No direct impact.

6.2.52 In conclusion, option 1b (online improvements and additional offline loop) provides a slightly better outcome than options 1a (new strategic link) and 1c (online improvements only) when considering how to upgrade the A228 to both solve existing problems (particularly highway safety) and to support future development.

6.2.53 Options 2a (online improvements), and 2b and 2c (new carriageways to Five Oak Green) have some similar scores. However, biodiversity, employment and noise impacts are predicted to be worse for Option 2a. In addition, air, heritage and travel impacts for 2a are either equal to or worse than option 2b or 2c. Land use and landscape are scored better for Option 2a largely reflecting the reduced land take required for Option 2a.

6.2.54 When comparing the outcome of scores for options 2b (hamlet loop) and 2c (direct connection onto the A228), 2b scores better for the travel, heritage, and air objectives. All other objectives have identical scores for both options.

6.2.55 When comparing the scores for options north or south of the railway, option 2d scores very poorly on the water objective due to the extensive areas of flood zone 2 and 3 that would need to be traversed. Option 2d is also scored slightly worse on the land use and biodiversity objectives reflecting the slightly greater land take required for this option. The remaining objectives are scored either equal to 2b or slightly better than option 2c.

6.2.56 The proposed transport improvements west of Tudeley Village and Paddock Wood and east Capel both produce a reasonable range of scores, largely neutral and with no significant negative impacts predicted.

## 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 Pre-Submission Local Plan. These are as follows:

- STR 2 – Place Shaping and Design
- STR 3 – Brownfield Land
- STR 4 – Ensuring Comprehensive Development
- STR 5 – Infrastructure and Connectivity
- STR 6 – Transport and Parking
- STR 7 – Climate Change
- STR 8 – Conserving and Enhancing the Natural, Built and Historic Environment
- STR 9 – Green Belt
- STR 10 – Neighbourhood Plans

7.1.2 Sustainability appraisals for each of these policies (except Strategic Policy 9: Green Belt) were carried out following the standard method described in Chapter 4.

7.1.3 Strategic Policy 9 related to specific releases of Green Belt land and so it was deemed appropriate to carry out a cumulative impact assessment of all sites allocated within the Pre-Submission Local Plan that included release of Green Belt land. The methodology for this is found at Appendix E.

7.1.4 For the remaining 8 policies, an alternative was assessed in which the policy was not included within the Pre-Submission Local Plan. Instead, the alternative placed reliance on a combination of national policies in the NPPF and its related Planning Practice Guidance, together with any relevant detailed policies proposed in the Pre-Submission Local Plan. In addition, where the policy wording in the Pre-Submission Local Plan was deemed to be materially different from that in the Draft Local Plan stage, this was assessed as a further alternative. Of note:

- Policy STR 2: 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 2. Since Draft Local Plan stage, this policy has been amended to include reference to healthy lifestyles. Therefore, the Pre-Submission Local Plan policy version has been appraised as a further alternative.
- Policy STR 3: Brownfield sites are limited in the borough and so there is high pressure to develop on less favourable greenfield land. Given the numerous environmental constraints in the borough, a strategic



priority to develop on brownfield land goes further than would be possible relying on a 'no policy' approach in line with the NPPF.

- Policy STR 4: The NPPF provides little explicit coverage of comprehensive development, except in relation to design. Pre-Submission 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. Since Draft Local Plan stage, this policy has been made more holistic, helping to avoid piecemeal development and therefore the Pre-Submission Local Plan policy version has been appraised as a further alternative.
- Policy STR 5: Identifying and coordinating the provision of infrastructure is highlighted as being critical to meeting economic objectives in the NPPF and 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. Since Draft Local Plan stage, this policy has been updated to be broader with greater consideration of sports, recreation and community services and therefore the Pre-Submission Local Plan policy version has been appraised as a further alternative.
- Policy STR 6: The NPPF gives particular attention to sustainable transport, while individual Pre-Submission 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. Since Draft Local Plan stage, this policy has been updated to be more flexible and with greater emphasis on sustainable and active transport and therefore the Pre-Submission Local Plan policy version has been appraised as a further alternative.
- Policy STR 7: Mitigation and adaptation to climate change is supported in the NPPF but the NPPF has not been updated since many Local Authorities declared climate emergencies and set targets to become carbon neutral. Like many authorities, the target for Tunbridge Wells Borough is more ambitious than that set out in the 2008 Climate Change Act (amended 2019) and the policy has been appraised on this basis. This policy is a new addition to the Pre-Submission Local Plan.
- Policy STR 8: The Pre-Submission Local Plan policy is compared to a No Policy option which relies on the NPPF and site-specific policies and relevant non-strategic policies for all aspects of the environment. Since Draft Local Plan stage, this policy has been updated to include stronger wording on landscape and archaeology and therefore the Pre-Submission Local Plan policy version has been appraised as a further alternative.
- Policy STR 9: 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 Pre-Submission Local Plan, so is appraised on that basis, effectively as a cumulative assessment of the relevant

individual development allocations. Alternatives to this strategy for Green Belt release are discussed in relation to STR 1: the development strategy.

- Policy STR 10: Neighbourhood planning is well supported through the NPPF, and this provides the basis of the alternative to STR 10 (which elaborates on the regard to neighbourhood plans). The amendments made to this policy since Draft Local Plan stage are not considered to be significant enough to warrant appraising the Pre-Submission Local Plan version as a stand-alone alternative.

## 7.2 Results

7.2.1 The sustainability appraisals for Strategic Policies 2 – 10 are shown below in Table 35, Table 36, Table 37, Table 38, Table 39, Table 40, Table 41, Table 42 and Table 43.

7.2.2 The full cumulative impact assessment which was used to derive the scores for STR 9 Green Belt can be seen in Appendix E.

Table 35. SA findings for the Strategic Policy 2: Place Shaping and Design.

<b>Sustainability Objective</b>	<b>No policy</b>	<b>Draft Local Plan Policy</b>	<b>Pre-Submission Local Plan Policy</b>
Air	0	++	++
Biodiversity	+	++	++
Business Growth	+	++	++
Climate Change	+	++	++
Deprivation	+	++	++
Education	+	++	++
Employment	+	++	++
Equality	+	++	++
Health	+	++	+++
Heritage	+	++	++
Housing	++	++	++
Land use	+	++	++
Landscape	+	++	++
Noise	+	++	++
Resources	+	++	++
Services & Facilities	+	++	++
Travel	+	++	++
Waste	0	++	++
Water	0	++	++

### Commentary

Scores 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 in the existing Local Plan or Core Strategy and thus without it these benefits would not be realised.

The new reference to healthy lifestyles in the Pre-Submission Local Plan Policy, helps create a better score for the health objective.

Table 36. SA findings for Strategic Policy 3: Brownfield Land.

<b>Sustainability Objective</b>	<b>No policy</b>	<b>New Policy</b>
Air	+	++
Biodiversity	+	++
Business Growth	0	0
Climate Change	+	++
Deprivation	0	0
Education	0	0
Employment	+	++
Equality	+	++
Health	0	0
Heritage	+	++
Housing	+	+
Land use	++	+++
Landscape	+	++
Noise	0	0
Resources	+	++
Services & Facilities	++	+++
Travel	++	+++
Waste	0	0
Water	0	0

### Commentary

The aim of this proposed new policy is to encourage the efficient use of land and existing buildings. For this reason, it aligns well with the land use and resources objectives. There are also numerous co-benefits from facilitating development on brownfield land such as diverting development away from greenfield sites which generally have a higher biodiversity and landscape value. Likewise, brownfield sites tend to be located within reach of reasonable facilities and services which are often accessible without the use of private cars.

Whilst the allocation policies within the Local Plan are likely to favour brownfield sites, the inclusion of a strategic policy such as this provides more certainty and focus, and thus reduces the risk of negative impacts upon these features.

Table 37. SA findings for Strategic Policy 4: Ensuring Comprehensive Development.

<b>Sustainability Objective</b>	<b>No policy</b>	<b>Draft Local Plan Policy</b>	<b>Pre-Submission Local Plan Policy</b>
Air	++	+++	+++
Biodiversity	++	+++	+++
Business Growth	++	+++	+++
Climate Change	++	+++	+++
Deprivation	++	+++	+++
Education	++	+++	+++
Employment	++	+++	+++
Equality	++	+++	+++
Health	++	+++	+++
Heritage	+++	+++	+++
Housing	++	+++	+++
Land use	-	+++	+++
Landscape	+	+++	+++
Noise	+++	+++	+++
Resources	+	+++	+++
Services & Facilities	+	+++	+++
Travel	++	+++	+++
Waste	+++	+++	+++
Water	++	+++	+++

### Commentary

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 equal, scores across all sustainability objectives.

It follows that without the policy, the potential for producing a sustainable development would not be realised.

The Pre-Submission Local Plan policy amendment offers improvements on the Draft Local Plan version as takes a more holistic approach, helping to avoid piecemeal development and thus covering potential issues such as under-provision of affordable housing, inefficient drainage, multiple unnecessary accesses. However, as shown, these further potential benefits cannot be reflected in the scores as they are already at the maximum of the positive range.

Table 38. SA findings for Strategic Policy 5: Infrastructure.

<b>Sustainability Objective</b>	<b>No policy</b>	<b>Draft Local Plan Policy</b>	<b>Pre-Submission Local Plan Policy</b>
Air	+	++	++
Biodiversity	+	++	++
Business Growth	+	++	++
Climate Change	?	?	?
Deprivation	+	++	++
Education	+	+++	+++
Employment	+	+	+
Equality	0	0	0
Health	+	++	++ / +++
Heritage	?	?	?
Housing	++	+++	+++
Land use	?	?	?
Landscape	?	+++	+++
Noise	?	?	?
Resources	?	?	?
Services & Facilities	+	+++	+++
Travel	+	+++	+++
Waste	0	0	0
Water	+	+++	+++

### Commentary

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 with 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. In addition, unknown scores are applied to the climate change objective to reflect the lack of guarantee that is required in both the NPPF and the one specific site for renewable energy. The Pre-Submission Local Plan policy scores more positively on the health objective than the Draft Local Plan Policy to reflect the incorporation of expectations for sport and recreation.

Overall, without this policy, the many improved scores, and associated benefits would not be realised.

Table 39. SA findings for Strategic Policy 6: Transport.

<b>Sustainability Objective</b>	<b>No policy</b>	<b>Draft Local Plan Policy</b>	<b>Pre-Submission Local Plan Policy</b>
Air	+	+++	+++
Biodiversity	?	+	+
Business Growth	+	+++	+++
Climate Change	++	+++	+++
Deprivation	0	0	0
Education	0	0	0
Employment	0	0	0
Equality	0	0	0
Health	0	0	0
Heritage	?	+	+
Housing	0	0	0
Land use	0	0	0
Landscape	0	+	+
Noise	0	++	++
Resources	0	0	0
Services & Facilities	+	+	+
Travel	++	+++	+++
Waste	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.

There are elements of the Pre-Submission Local Plan policy that are an improvement upon the Draft Local Plan policy e.g. the commitment to low traffic neighbourhoods. However, this is not reflected in the scores because the earlier policy was itself very positive and had already attained the maximum positive score.

The SA scores for specific elements of this policy such as a Five Oak Green bypass are considered in Chapter 6.

Table 40. SA findings for Strategic Policy 7: Climate Change

<b>Sustainability Objective</b>	<b>No policy</b>	<b>New Policy</b>
Air	++	+++
Biodiversity	+	++
Business Growth	+	++
Climate Change	++	+++
Deprivation	0	0
Education	0	0
Employment	0	+
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	+	++
Landscape	0	0
Noise	0	0
Resources	++	+++
Services & Facilities	0	0
Travel	++	+++
Waste	+	++
Water	++	+++

### Commentary

Addressing climate change is one of the core land use planning principles of the NPPF and a statutory duty for local planning authorities under the Climate Change Act 2008 and Section 19(1A) of the Planning and Compulsory Purchase Act 2004. It is also a central consideration within sustainable development with far reaching effects on the natural environment, economic growth and communities. Thus, it is expected that clear direct and indirect benefits will be seen even without a strategic policy on this topic. The addition of a policy that recognises and supports the borough target to reach carbon neutrality (ahead of the targets within the Climate Change Act) will bring about benefits more quickly and allow greater recovery time for features such as biodiversity that are already feeling the impact of climate change.



Table 41. SA findings for Strategic Policy 8: Environment.

<b>Sustainability Objective</b>	<b>No policy</b>	<b>Draft Local Plan Policy</b>	<b>Pre-Submission Local Plan Policy</b>
Air	0	0	0
Biodiversity	++	+++	+++
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	0	0	0
Employment	0	0	0
Equality	0	0	0
Health	+	++	++
Heritage	++	+++	+++
Housing	0	0	0
Land use	0	+	+
Landscape	++	+++	+++
Noise	0	0	0
Resources	0	0	0
Services & Facilities	0	0	0
Travel	0	0	0
Waste	0	0	0
Water	++	+++	+++

### Commentary

This policy has highly positive benefits for the environmental objectives of heritage, landscape and biodiversity. Land Use is likely to benefit indirectly through the protection of soils and 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.

While the Pre-Submission Local Plan version of this policy provides greater detail on archaeology and landscape, these two objectives were already applied the maximum score possible and the Pre-Submission Local Plan amendments are not considered materially different.

Table 42. SA findings for Strategic Policy 9: Green Belt.

<b>Sustainability Objective</b>	<b>Cumulative Assessment of Green Belt release sites</b>
Air	?
Biodiversity	-
Business Growth	++
Climate Change	--
Deprivation	++
Education	++
Employment	+++
Equality	++ / +++
Health	++ / +++
Heritage	--
Housing	+++
Land use	---
Landscape	-- / ---
Noise	--
Resources	0 / +
Services & Facilities	+ / ++
Travel	+
Waste	0
Water	?

### Commentary

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 small addition of 1.1ha of land to the Green Belt (Land West of Colts Hill, close to Badshell Road) is also considered within the cumulative scores as are the compensatory measures being considered by the Council. The scale of Policy STR/SS 1 and STR/SS 3 in comparison to the other allocations, dominates this assessment of cumulative effects. Mixed scores are assigned for air and water to reflect the wide variety of scores across the sites.

Without this policy, these benefits and adverse effects would not be realised.

Alternatives to this strategy are discussed in Chapter 6.

See Appendix E for more detailed scoring.

Table 43. SA findings for Strategic Policy 10: Neighbourhood Plans.

<b>Sustainability Objective</b>	<b>No policy</b>	<b>New Policy</b>
Air	++	++
Biodiversity	++	+++
Business Growth	++	+++
Climate Change	++	++
Deprivation	++	+++
Education	++	+++
Employment	++	+++
Equality	++	+++
Health	++	+++
Heritage	++	+++
Housing	++	+++
Land use	++	++
Landscape	++	+++
Noise	++	+++
Resources	++	+++
Services & Facilities	++	+++
Travel	++	++
Waste	+	++
Water	++	+++

### **Commentary**

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.

The Pre-Submission Local Plan policy is not considered to be materially different from the Draft Local Plan policy.

## 7.3 Findings

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

- the economic and social 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 9 (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.

7.3.2 The main findings of the above appraisals of the respective strategic policies are:

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

## 8 SA of the Potential Development Sites

### 8.1 Background and Method

8.1.1 All sites have been separately 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 22<sup>nd</sup> February 2019 (known as 'late sites' or 'additional sites' and 'A\_S' on all figures in this chapter).

8.1.2 Sites received since 22<sup>nd</sup> February 2019 are assessed using this same methodology for possible inclusion in the 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 are also 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. Further details are contained in the SHELAA report, but it is noted that 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 relatively 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 the 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

8.1.4 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.

8.1.5 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 which are defined as constraints that would preclude most forms of built development for example ancient woodland, Sites of Special Scientific Interest (SSSI) and Flood Zone 3;
- 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.

- 8.1.6 Following the determination of reasonable alternatives, the methodology for sustainability appraisal set out in Chapter 4 of this report was followed for each site.
- 8.1.7 All sites were initially scored according to the above method and recommendations for mitigation were made. When draft site allocations were being formulated, a further stage of SA was undertaken, taking account of the type of development proposed on each site and the specific draft criteria that it should meet.
- 8.1.8 Where proposals were put forward for inclusion in the Local Plan to safeguard land for a particular purpose, the SA objectives tended to be scored as neutral for all objectives except any that related directly to the proposed purpose for safeguarding. For example, land safeguarded for future road improvements was scored as neutral for all objectives except Travel which was assigned a positive score.
- 8.1.9 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 Local Plan that were relevant to the parish. For example, DM policy TP 6 was considered in the cumulative scores for Pembury parish.
- 8.1.10 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, which have informed the development parameters of individual site allocations and strategic policies for parishes wherever possible (Appendix C). An example in which it was not possible to incorporate these suggestions is the retention of hedgerows which is not always possible because of access requirements.
- 8.1.11 Within these tables, site references in these tables correspond with the references within the SHEELA and policy references correspond with those within the Pre-Submission Local Plan.

## 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 F - U.
- 8.2.2 It should be noted that it does not necessarily follow that the sites with the most favourable SA score should be allocated for development, as there are other factors which must be considered. Caution is also given in respect of simply adding up respective scores, as they must be understood in the context of the site under consideration, as well as the overall strategy.
- 8.2.3 At a high level, the site selection has regard to the contribution it may make to meeting the overall need for housing and employment development and the earlier findings in terms of the most appropriate development strategy (as reflected at Policy STR 1 of the Pre-Submission Local Plan).
- 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 Town and Parish Councils. 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. Deliverability is noted as being another important consideration, largely beyond the scope of the SA.



## Royal Tunbridge Wells

Table 44. List of reasonable alternative sites in Royal Tunbridge Wells.

Site Ref	Site Address	Policy Ref
7	Montacute Gardens, Royal Tunbridge Wells, TN4 8HG	AL/RTW 10
24	Land at Wyevale Garden Centre, Eridge Road, Tunbridge Wells TN4 8HP	AL/RTW 14
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 19 (part site)
57	Land adjacent to Longfield Road, Tunbridge Wells	AL/RTW 17
72	Former North Farm landfill site, North Farm Lane, Tunbridge Wells TN2 3EE	AL/RTW 18
73	Land at Pembury Road (south), Tunbridge Wells	Not allocated.
99	Land at Pembury Road, Tunbridge Wells TN2	Not allocated.
100	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road (including part of Site 30)	AL/RTW 5
101	Colebrook House, Pembury Road, Capel TN11 0QD	Not allocated but see Appendix E.
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 16 (part site)
138	Knights Park, Tunbridge Wells TN2 3UW	Not allocated.
139	Knights Park, Tunbridge Wells TN2 3UW	Not allocated.
140	Knights Park, Tunbridge Wells TN2 3UW	Not allocated.
145	Turner Pie Factory, Broadwater Lane, Tunbridge Wells TN2 5RD	AL/RTW 13
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 12

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
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	STR/RTW 2
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 20
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	Not allocated.
238	Land at Colebrook Sports Field, Liptraps Lane, Tunbridge Wells	AL/RTW 21
249	Cemetery Depot, Benhall Mill Road, Tunbridge wells	Not allocated.
250	Land at Royal Victoria Place, Tunbridge Wells	STR/RTW 2
251	8 Grosvenor Road, Royal Tunbridge Wells	Not allocated.
258	TN2 Centre and adjacent land, Greggs Wood Rd, Sherwood	AL/RTW 8
260	Land at the Auction House, Linden Park Road, Royal Tunbridge Wells, TN2 5QL	AL/RTW 2 (part site)
261	Former North Farm landfill site, North Farm Lane, Tunbridge Wells TN2 3EE	AL/RTW 18
262	Mount Pleasant car park and surgery, Mount Pleasant Avenue	STR/RTW 2
263	Mount Pleasant car park and surgery, Mount Pleasant Avenue	STR/RTW 2
264	Town Hall/Town Centre site, Royal Tunbridge Wells	STR/RTW 2
267	Rowan Tree Road, Showfields, Tunbridge Wells (part site)	AL/RTW 15
268	Vale Avenue and Torrington Car Park, Tunbridge Wells	STR/RTW 2
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.
SALP AL/RT W 5	Land at 36-46 St John's Road	AL/RTW 4
SALP AL/RT W 22	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	AL/RTW 3

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
SALP AL/RT W 20	Land at 77 Mount Ephraim (Sturge House, Brockborne House)	Not allocated.
SALP AL/RT W 2B	Former cinema site, Mount Pleasant Road	AL/RTW 1
SALP AL/RT W 10	Land at former Gas Works, Sandhurst Road	AL/RTW 7
EA_19 5	Land at 1 Meadow Road and 8 Upper Grosvenor Road	Not allocated.
SALP AL/RT W 16	Land at Beechwood Sacred Heart School	AL/RTW 9
DPC 5	Land north of Hawkenbury Road	Not allocated
459	Land at 202 and 230 Upper Grosvenor Road	AL/RTW 6

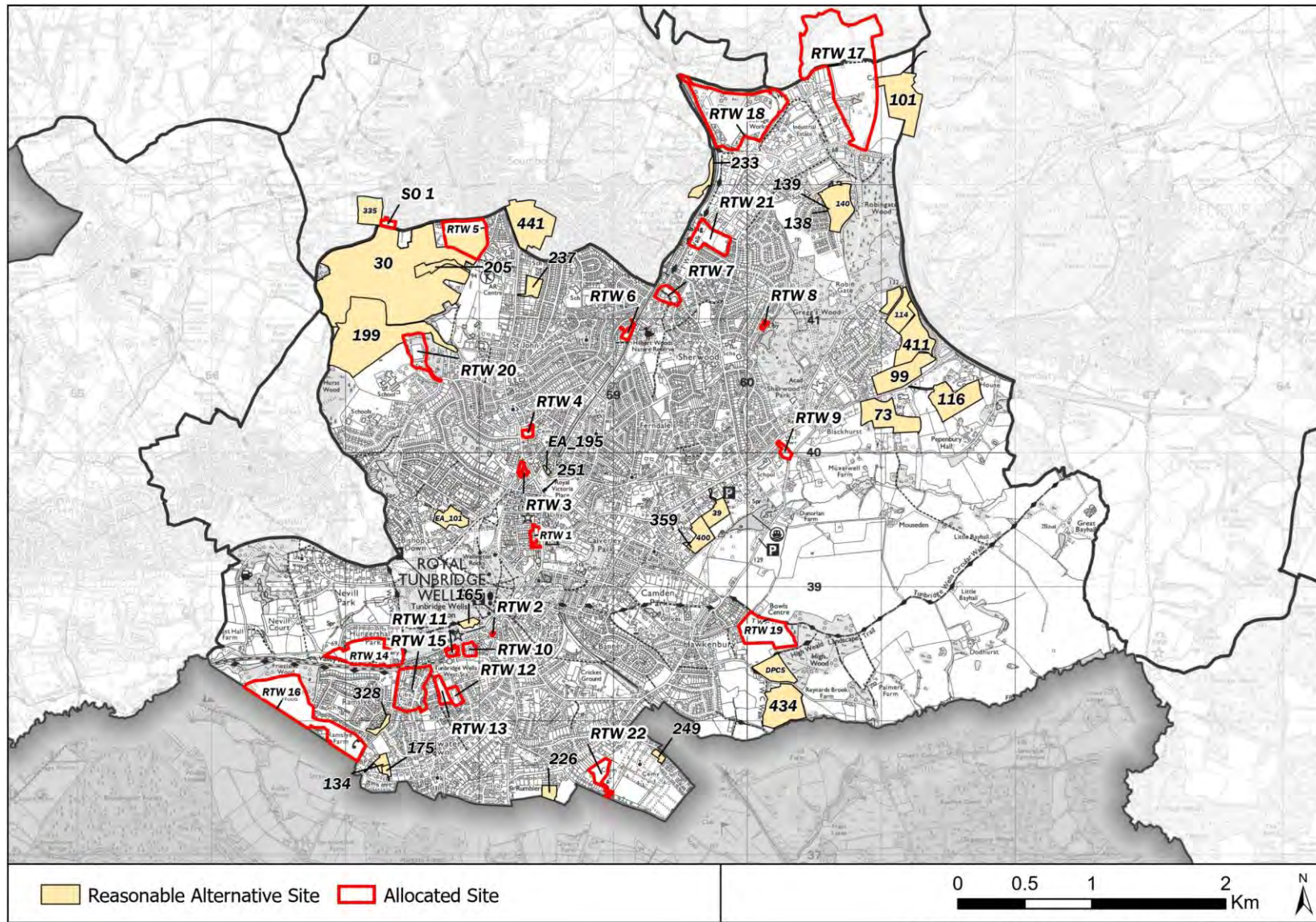


Figure 10. Map of reasonable alternative sites within Royal Tunbridge Wells

Table 45. SA scores for allocated sites in Royal Tunbridge Wells (part 1 of 2).

Sustainability Objective	AL/RTW 1	AL/RTW 2	AL/RTW 3	AL/RTW 4	AL/RTW 5	AL/RTW 6	AL/RTW 7	AL/RTW 8	AL/RTW 9	AL/RTW 10	AL/RTW 11	AL/RTW 12
Air	?	?	?	?	0/-	0	0/+	+	0/-	?	?	?
Biodiversity	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
Climate Change	0/-	0	0/-	0	-	0	-	0	0/-	0	0	0
Deprivation	+	0	0/+	0/+	0	0/+	+	+	0	0	0/+	0/+
Education	0/+	0	0	0/?	0	+	0/+	0	0	+	+	+
Employment	+++	++	+	+	+	+	+	+	+	+	+	+
Equality	+ / ++	+ / ++	+ / ++	+ / ++	0	+	+	+	+	+ / ++	+ / ++	+ / ++
Health	0/+	0	0/+	0/+	+	+	+	+	++	0/+	0/+	0/+
Heritage	-	0	-	0	0	0	0	0	0	--	0	0
Housing	++	0	++	++/?	++	+	++	0	+	+	+	+
Land use	+	+	+	+	- / --	-	+	+	-	0/-	+	+
Landscape	0/+	0	0/?	0/?	-	0	0	-	0/-	- / --	0/?	0
Noise	-	0	-	-	-	-	-	-	0/-	-	-	-
Resources	0/?	0	+/?	---/?	0/?	--/?	0/?	0/?	0/?	---/?	?	?
Services & Facilities	+++	0	++/+ ++	++/+ ++	++	++	++	++	++	++/++ +	++/++ +	++/++ +
Travel	+ / ++	+	+ / ++	+ / ++	++	+ / ++	++/++ +	++/+ ++	+	+ / ++	+ / ++	+ / ++
Waste	0	0	0	0	0	0	0	0	0	0	0	0
Water	0	0	0	0	0	0	?	0	0	0	0	0

Table 46. SA scores for allocated sites in Royal Tunbridge Wells (part 2 of 2).

Sustainability Objective	AL/RTW 13	AL/RTW 14	AL/RTW 15	AL/RTW 16	AL/RTW 17	AL/RTW 18	AL/RTW 19	AL/RTW 20	AL/RTW 21	AL/RTW 22	STR/RTW 2	STR/RTW 1 (cumulative)
Air	?	?	?	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	0	++	+ / ++
Climate Change	0	0/-	-	0/-	0/-	?	0	0	0/-	0	?	- / --
Deprivation	0/+	0/+	+	0	0	0	0	0	0	0	+	+ / ++
Education	+	+	+	+	0	0	0	0/+	+	0/+	++	+
Employment	+	+	++	++	+++	+++	+	+	+	+	++	+++
Equality	+ / ++	+ / ++	+ / ++	+ / ++	0	0/+	+	+	0/+	0	++	++
Health	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/+	++	++ / ++ +
Land use	+	0/-	+ / ++	- / --	--	0	0/-	- / --	-	-	++	?
Landscape	0/+	0/-	0	- / --	-	0/-	-	0	0/-	0	0	-
Noise	-	- / ?	-	- / --	0/-	0/-	0/-	0/-	0/-	0	?	- / --
Resources	--- / ?	- / ?	--- / ?	0 / ?	0 / ?	0 / ?	0	--- / ?	- / ?	0	?	?
Services & Facilities	++ / + ++	++	+++	++	0	+	+++	++	+	++	+++	++ / ++ +
Travel	+ / ++	+	+	+ / ++	0/+	0/+	+	+	+ / ++	0	++	++
Waste	0	0	0	0	0	0	0	0	0	0	0	0
Water	0	0/+	?	?	0	0/+	0	0/+	0	0	0	-

## Commentary

Development proposed in Royal Tunbridge Wells is largely sustainable with half of the objectives scored as positive or neutral when considering cumulative effects (STR/RTW 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 bringing with it financial contributions for improvements and being served by a wide range of facilities and services so that private car use is not essential. Land Use and Resources are also scored as 'mixed' to reflect the wide-ranging scores across the allocations. Noise and Water are scored negatively to reflect the collective impact of all proposed development.

Economic and social objectives for STR/RTW 1 are all positive or highly positive largely reflecting the expected gains in employment and housing within a settlement that has a wide range of services, facilities and travel options. Further commentary on the key issues that were considered when applying scores for both the allocated sites and the reasonable alternatives can be found in Appendix F.

The Town Centre Policy (STR/RTW 2) is also largely sustainable with mostly positive or neutral scores across all three pillars of sustainable development.

The three exceptions to this are the heritage objective which scores slightly negatively to reflect the potential risk to sensitive assets, and the noise and air objectives which are given mixed scores because focussed development in the town centre could bring about more traffic (particularly increased commercial, employment and cultural development), but the policy plans for reduced private car dependency. These later two scores were prevented from being more negative by the emphasis on active travel infrastructure in the policy and low traffic neighbourhoods.

The climate change and resources objectives score as 'mixed' to reflect that demolition and rebuild is likely to be necessary, but redevelopment could provide more energy efficient buildings in a town where private car use is not essential.

On the whole, the reasonable alternatives that were not chosen for allocation had more negative scores than those that were allocated. In some locations across the settlement, reasonable alternative scores reflected the sensitivity of the local environment for example sites near the northern stretch of the Pembury Road. In other locations, the scale of the reasonable alternative was considered detrimental and the cause of negative scores; for example, the cluster of sites in the north west of the settlement. Finally, some reasonable alternative sites were scored poorly for more specific reasons (despite adjacent sites being suitable for allocation), such as the very sensitive landscape that would be impacted upon by Site 434.

Some Reasonable Alternatives were discounted for reasons outside of the scope of the SA, such as accessibility concerns for site 237, yield concerns for site 249 or, in

the case of sites SALP AL/RTW 20 and EA\_195, by a decision to retain the existing uses of the site via the Development Management process.

Since Draft Local Plan stage, the Retail, Leisure and Town Centre Uses Study has been undertaken a proposal has been made for a Town Centre Area action plan. This updated information has been taken into account and scores adjusted to sites appropriately. For example, site 176 (AL/RTW 11) is now allocated for only residential development (rather than retail/employment plus residential) to ensure retail remains focussed on the town centre, rather than locations out of the town centre.

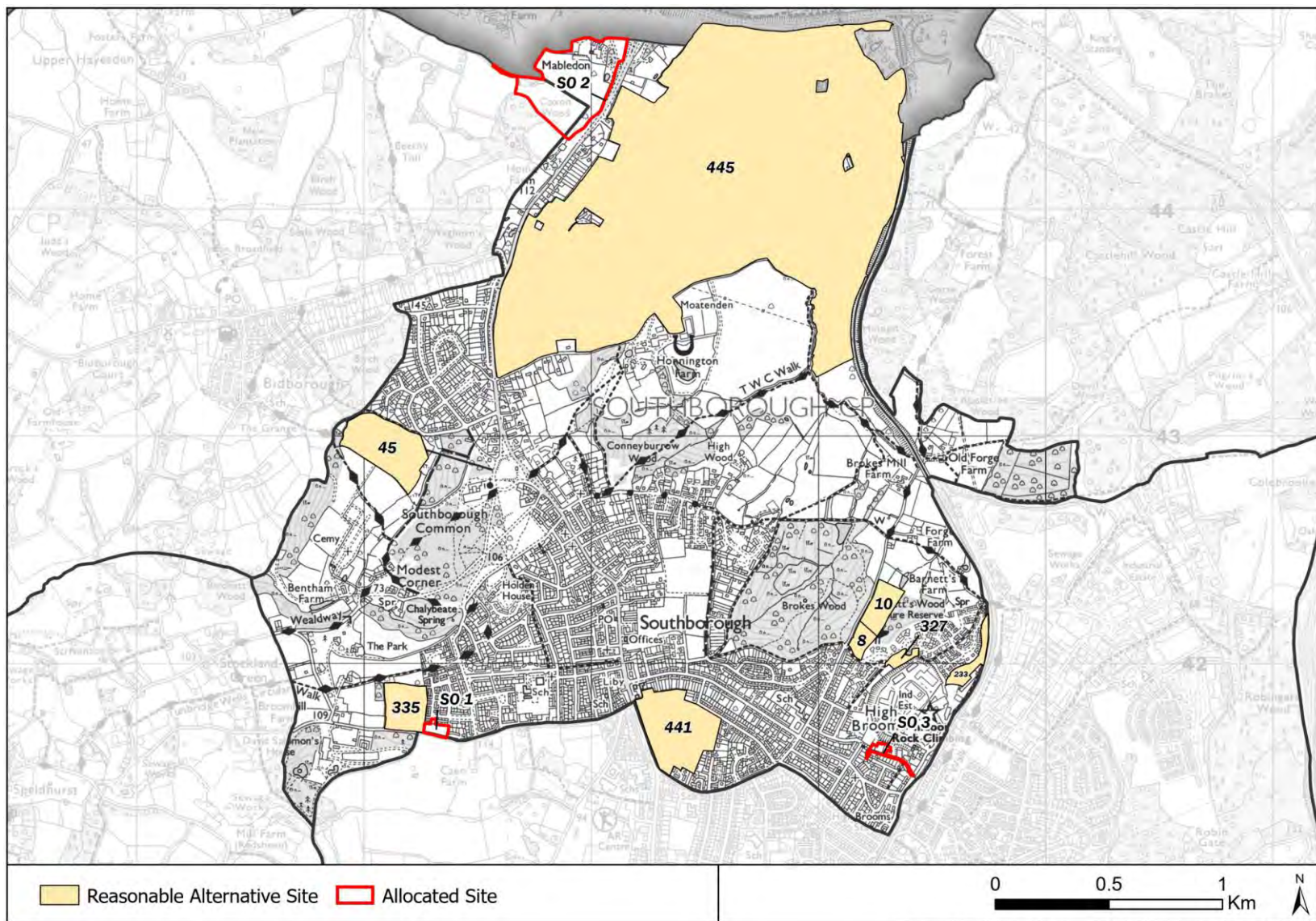
It is also noted that three planning applications are being (or will soon be) considered bordering Royal Tunbridge Wells but in neighbouring Wealden District Council. Together, if approved, these developments could amount to a further c.400 additional dwellings (including c.150 care units). On a precautionary basis, these are considered with the site allocations for cumulative effects. The sites are in the south east of the town and thus near to Sites 238, 249 and 434. Landscape effects reflecting the sensitive AONB landscape are expected to be similar to these sites but more negative due to the large size of the Wealden sites. The sites will increase demand; thus air, noise and education impacts are predicted to be negative. The sites will benefit from the services and facilities provided by the town centre, but the urban edge location may mean some residents are reluctant to choose active travel modes. These key findings have been taken into account when assigning cumulative impact scores in Table 46 above.



## Southborough

Table 47. List of reasonable alternative sites in Southborough

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
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 2
232	Land at Bright Ridge, and Speldhurst Road (former Speldhurst Road allotments), Southborough	AL/SO 1
233	Land to the rear of Hornbeam Avenue and Walnut Way, Southborough	Not allocated
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	Not allocated
DPC 13	Land at Baldwins Lane, North Farm Road, Southborough	AL/SO 3



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Figure 11. Map of reasonable alternative sites within Southborough.

Table 48. SA scores for allocated sites in Southborough

Sustainability Objective	AL/SO 1	AL/SO 2	AL/SO 3	STR/SO 1 (cumulative)
Air	?	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	+	++	+	+ / ++
Heritage	0	?	0	0
Housing	+	0	+	0 / +
Land use	-	0 / -	+	0 / -
Landscape	0 / -	-	0	0 / -
Noise	0 / -	0 / -	-	-
Resources	0 / ?	?	--- / ?	?
Services & Facilities	+	0 / +	++	+ / ++
Travel	+ / ++	+	++ / +++	++
Waste	0	0	0	0
Water	0 / +	0	0	0 / -

### Commentary

Development proposed in this parish (STR/SO 1) is largely sustainable with mostly positive or neutral scores.

Scores for the social and economic objectives are all positive whereas scores for the environmental objectives ranged from – to 0. 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 services so that private car use is not essential. The intention to develop a Low Traffic Neighbourhood is also recognised. Noise and water are scored slightly negative to reflect the collective impact of all proposed development.

More detailed commentary can be found in Appendix G.

Scores and commentary have been updated to reflect comments made during consultation and the findings of additional studies undertaken in 2020 such as the Landscape and Visual Impact Assessment Report.

The sites chosen for allocation above largely scored more positively than the reasonable alternatives shown in Appendix G. For example, the sensitive locations of sites 10, 45, 335 and 445 in terms of landscape, biodiversity and/or Green Belt caused these sites to have more negative scores.

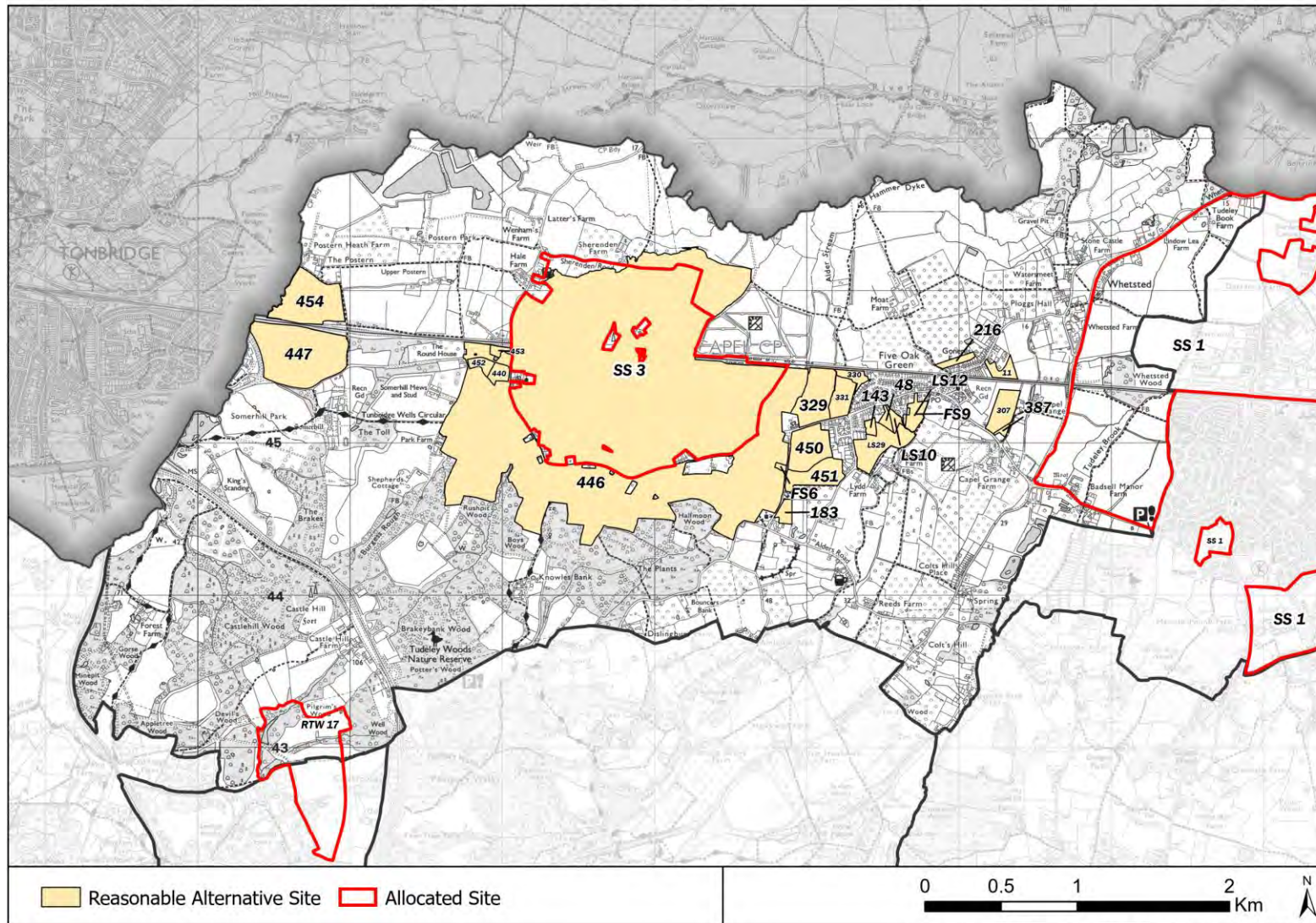
The remaining reasonable alternatives were awarded similar or better scores than the chosen allocated sites but rejected for reasons of outside of the SA remit such as deliverability (site 441), unsuitable yield (site 327), or highway concerns (site 8).

**Capel (including Tudeley Village)**

Table 49. List of reasonable alternative sites in Capel Parish

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
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
142	Land to the north of Badsell Road, Five Oak Green, TN12 6QR	STR/SS 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	STR/SS 1
310	Land at Whetsted Farm, Maidstone Road, Five Oak Green, Kent	STR/SS 1
311	Land at Sebastopol, Whetsted Road, Five Oak Green, Kent	STR/SS 1
312	Land at Whetsted Wood, Maidstone Road, Five Oak Green, Kent	STR/SS 1
314	Land south of Whetsted Road, Paddock Wood, Kent	STR/SS 1
317	Tudeley Brook Farm, Whetsted Road, Paddock Wood, Kent	STR/SS 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
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	Not allocated
448	Land at Tudeley, Tudeley	STR/SS 3
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	Not allocated
LS_10	Orchard Brook, Five Oak Green Road, Five Oak Green, Tonbridge	Not allocated
LS_12	Land on the south side of Five Oak Green Road, Five Oak Green, Tonbridge	Not allocated
LS_29	Land at Sychem Lane, Five Oak Green	Not allocated
n/a	A228 Strategic Link	TP 6

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
DPC_19	Tudeley Brook Farm, Whetsted Road, Paddock Wood	STR/SS 1
FS_6	Orchard Cottage, Church Lane	Not allocated
FS_9	Land South of B2017 Including Nutley Orchard	Not allocated
n/a	Strategic and local highway network improvements including Five Oak Green bypass	STR 6



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Figure 12. Map of reasonable alternative sites within Capel Parish.  
 Also see Figure 13 for a map of neighbouring sites in Paddock Wood that form part of the urban extension.

Table 50. SA scores for allocated sites in Capel Parish

Sustainability Objective	STR/SS 3 (Tudeley Village)	STR 6 (Highways)*	STR/SS 1 (PW Extension)	STR/CA 1 (cumulative)
Air	?	+ / ++	?	?
Biodiversity	0 / -	-	0 / +	0 / -
Business Growth	+	+	+ / ++	++
Climate Change	-	?	- / --	-
Deprivation	+	0	+ / ++	+ / ++
Education	+ / ++	0	+ / ++	++
Employment	++	+	++	++ / +++
Equality	++ / +++	0	++	++
Health	++	0	++	++ / +++
Heritage	--	0 / -	-	-
Housing	+++	0	+++	+++
Land use	-- / ---	- / --	-- / ---	-- / ---
Landscape	--	- / --	- / --	--
Noise	- / --	+	- / --	- / --
Resources	0 / +	0	0 / +	0 / +
Services & Facilities	+++	0	++	++ / +++
Travel	++	+++	+	++ / +++
Waste	0	0	0	0
Water	++ / ?	0	++ / ?	++ / ?

\* Scores represent a combination of options 1b, 2b, 3 and 4 from Chapter 6.

## Commentary

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 STR/SS 3 in comparison to the other allocations, dominates the assessment of cumulative effects for this parish.

NOTE: The majority of STR/SS 1 is within Paddock Wood parish. However, there is some overlap with Capel parish and thus scores for STR/SS 1 are included in this assessment too.

Detailed explanations for how the scores for the STR/SS 1 and STR/SS 3 were determined can be found in Table 28 and Table 29.

Further commentary can be found in Appendix H.

The remaining reasonable alternative sites in the parish were rejected for allocation due to issues such as concern that allocating sites around Five Oak Green would tend toward coalescence and the loss of its discrete identity.

Whilst the A228 Colts Hill bypass covered by policy TP 6 does fall within the parish boundaries, it is not given great weight when determining cumulative impacts, as there is no certainty that the scheme would be delivered (policy safeguards the route only).

## Paddock Wood

Table 51. List of reasonable alternative sites in Paddock Wood Parish

Site Ref	Site Address	Policy Ref
20	Land at Knells Farm, Queen Street, Paddock Wood	STR/SS 1
47	Ledgers Works, Queen Street, Paddock Wood TN12 6NN	STR/SS 1
51	Land West of Maidstone Road and north of Eldon Way, Paddock Wood	STR/SS 1
79	Land at Church Farm, Church Road, Paddock Wood	STR/SS 1
212	Land to the north of Chantlers Hill, Paddock Wood	STR/SS 1
218	Land at Little Rhoden Farm, Lucks Lane, Paddock Wood, TN12 6PA	STR/SS 1
272	Wesley Centre and Land at Commercial Road / Old Kent Road, Paddock Wood TN12 6DS	STR/SS 2
276	Land at Dowding House, Commercial Road, Paddock Wood	STR/SS 2
313	Land at Eastlands, Paddock Wood	STR/SS 1
315	Land at Eastland Cottages, Maidstone Road, Paddock Wood	STR/SS 1
316	Land to the south of Tudeley Brook Farm, Paddock Wood	STR/SS 1
318	Land to the north of Durrant's Farm, Maidstone Road, Paddock Wood	STR/SS 1
319	Land adjacent to Leys Cottages, Maidstone Road, Paddock Wood	STR/SS 1
340	Kerylands Sale Field, Lucks Lane, Paddock Wood	STR/SS 1
342	Land north of Chantlers Hill, Paddock Wood	STR/SS 1
344	Land to the east of Mascalls Court Road, Paddock Wood	STR/SS 1
347	Swatlands Farm, Lucks Lane, Paddock Wood, Tonbridge	STR/SS 1
371	Land to the north of Mascalls Court Road, Paddock Wood	STR/SS 1
374	Land to the north of Church Road and adjacent to Queen Street	STR/SS 1
376	Land to the south of Mascalls Court Lane, Paddock Wood	STR/SS 1
402	Land west of Maidstone Road and north of Eldon Way, Paddock Wood	STR/SS 1
LS_26	Park Farm, Queen Street, Paddock Wood	Not allocated
LS_48	Elm Tree, Mile Oak Road, Paddock Wood	STR/SS 1
SALP AL/P W 4	Land at Mascalls Farm (plus adjacent land at LS_52)	AL/PW 1
n/a	Paddock Wood Town Centre	STR/SS 2
MF_1	Land at the Memorial Field, west of Maidstone Road	
DPC_1	2 Eastland Cottages, Maidstone Road	STR/SS 1
DPC	BarthHaas UK, Hop Pocket Lane	STR/SS 2



<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
_14		
DCP 15	Greenfields Farm, Paddock Wood	H 9
DPC 17	Paddock Wood Garden Centre	STR/SS 1
DPC 6	Land at Mile Oak Road & Knowle Road, Paddock Wood	Not allocated
DPC 8	Mile Oak Stables, Mile Oak Road, Paddock Wood	Not allocated
n/a	Strategic and local highway network improvements including Five Oak Green bypass	STR 6

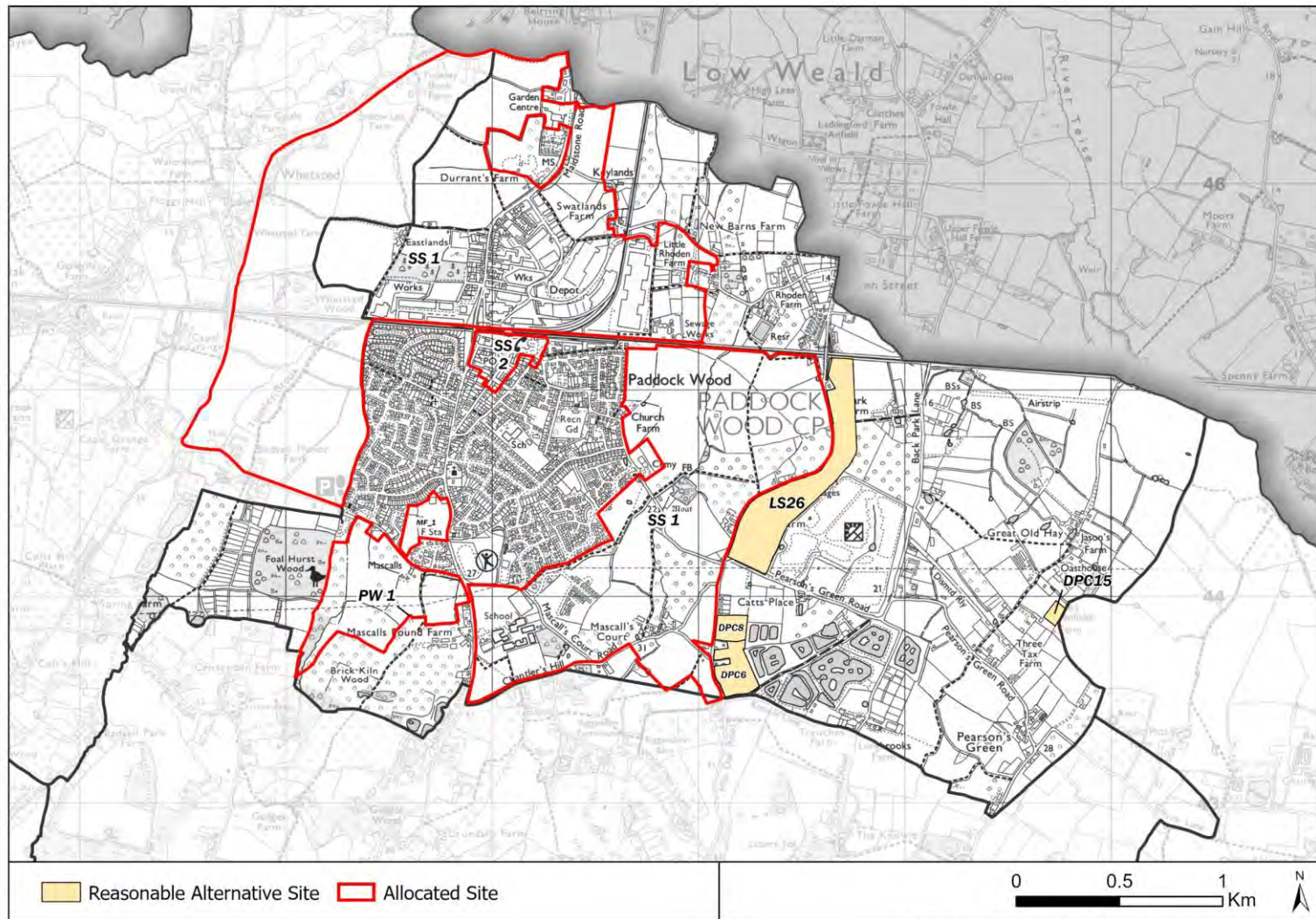


Figure 13. Map of reasonable alternative sites within Paddock Wood Parish. Also, see Figure 12 for a map of neighbouring sites in Capel that form part of the urban extension.

Table 52. SA scores for allocated sites in Paddock Wood Parish

Sustainability Objective	STR/SS 1 (PW extension)	STR/SS 2 (Town centre)	STR 6 (Highways)*	AL/PW 1	H 9	STR/PW 1 (cumulative)
Air	?	+	+ / ++	0 / -	0	?
Biodiversity	0 / -	0	-	0 / -	0	0 / -
Business Growth	+ / ++	++ / +++	+	0	0	++ / +++
Climate Change	- / --	? / -	?	? / --	0	--
Deprivation	+ / ++	+ / ++	0	0	0	++
Education	+ / ++	+	0	+	0	++
Employment	++	++	+	+	0	++ / +++
Equality	++	+	0	+	0	++
Health	++	0 / +	0	+	0	++ / +++
Heritage	-	0	0 / -	-	0	- / --
Housing	+++	0 / +	0	++ / ++ +	0 / +	+++
Land use	-- / ---	+	- / --	--	0	--
Landscape	- / --	0 / +	- / --	- / --	0	- / --
Noise	- / --	0	+	0 / -	0	-
Resources	0 / +	?	0	0 / ?	0	0 / +
Services & Facilities	++	++	0	+ / ++	0 / -	++
Travel	+	++ / +++	+++	+	0 / -	++ / +++
Waste	0	0	0	0	0	0
Water	++ / ?	0 / +	0	0	0	++ / ?

\* Scores represent a combination of options 1b, 2b, 3 and 4 from Chapter 6.

## Commentary

Most scores for STR/PW 1 are positive or neutral 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 enhancements that are possible with STR/SS 1.

The majority of STR/SS 1 is within Paddock Wood parish. However, there is some overlap with Capel. The scale of Policy STR/SS 1 in comparison to the other allocations, dominates the assessment of cumulative effects for this parish.

Detailed explanations for how the scores for STR/SS 1 were determined can be found in Table 29.

Further commentary can be found in Appendix I. The remaining reasonable alternative sites in the parish were rejected for allocation for reasons such as negative landscape and land use scores or because they were ear-marked for an alternative use as gypsy intensification site.

## Cranbrook and Sissinghurst

Table 53. 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	Not allocated
54	Land on the east side of Mill Lane, Sissinghurst, TN17 2HX	Not allocated
59	Gate Farm, adjacent to Hartley Road and Glassenbury Road, Hartley, Cranbrook, TN17 2ST (also LS_14)	Not allocated
68	Land at Corner of Frittenden Road and Common Road, Sissinghurst.	AL/CRS 7
70	Land south west of Campion Crescent at Hartley, Cranbrook.	Not allocated
71	Land adjoining Cranbrook Primary School, Off Quaker Lane, Cranbrook, TN17 3JZ: Site B.	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	Not allocated
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	Not allocated.
128	Scott Field, Main Campus, Cranbrook School, adjacent to Bakers Cross, Cranbrook.	Not allocated
129	Big Side Playing Field adjacent to Quaker Lane and Waterloo Road, Cranbrook	Not allocated
130	Cranbrook School Main Campus, Waterloo Road, Cranbrook TN17 3JD	AL/CRS 4
131	Jaegers Field, Angley Road, Cranbrook	Not allocated
132	Rammell Field, Bakers Cross, Cranbrook	Not allocated
133	Land adjoining Cranbrook Primary School, Quaker Lane Cranbrook	Not allocated
159	Land south of The Street, Sissinghurst	AL/CRS 6
188	Land adjacent to Hartley Dyke, Cranbrook	Not allocated
292	Land South of Corn Hall, Crane Valley, Cranbrook (and part 396)	AL/CRS 2
296	Oak Tree Farm, The Common, Wilsey Pound, Cranbrook	Not allocated
323	Land adjacent to Hartley Gate Farmhouse Cranbrook Kent	Not allocated
345	Land adjacent Glassenbury Road, Glassenbury Road, Cranbrook Kent	Not allocated
396	Land West of Freight Lane, Cranbrook	Not allocated
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 3

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
442	Land Adjacent Orchard Cottage, Frittenden Road, Sissinghurst	Not allocated
LS_6	Part OS Plot 2429 Common Road, Sissinghurst, Cranbrook	Not allocated
LS_30	Pinecroft, Frittenden Road, Sissinghurst, TN17 2AQ	Not allocated
LS_32	Land off Golford Road, Cranbrook,	Not allocated
LS_37	Glenn House, Hartley Road, Cranbrook. TN17 3QP	Not allocated
LS_53	Land at Bull Farm, Glassenbury Road, Hartley	Not allocated
LS_51	St Georges Hall, The Street, Sissinghurst (also see Site 159)	Not allocated
SC_1	Sissinghurst Castle Garden	AL/CRS 5
FS1	Courtlands, Turnden Road, Hartley, Cranbrook	Not allocated
FS8	Land Adjacent to The Barracks, Cranbrook	Not allocated
BK_1	Land at Brick Kiln Farm, Cranbrook (and part 396)	AL/CRS 1

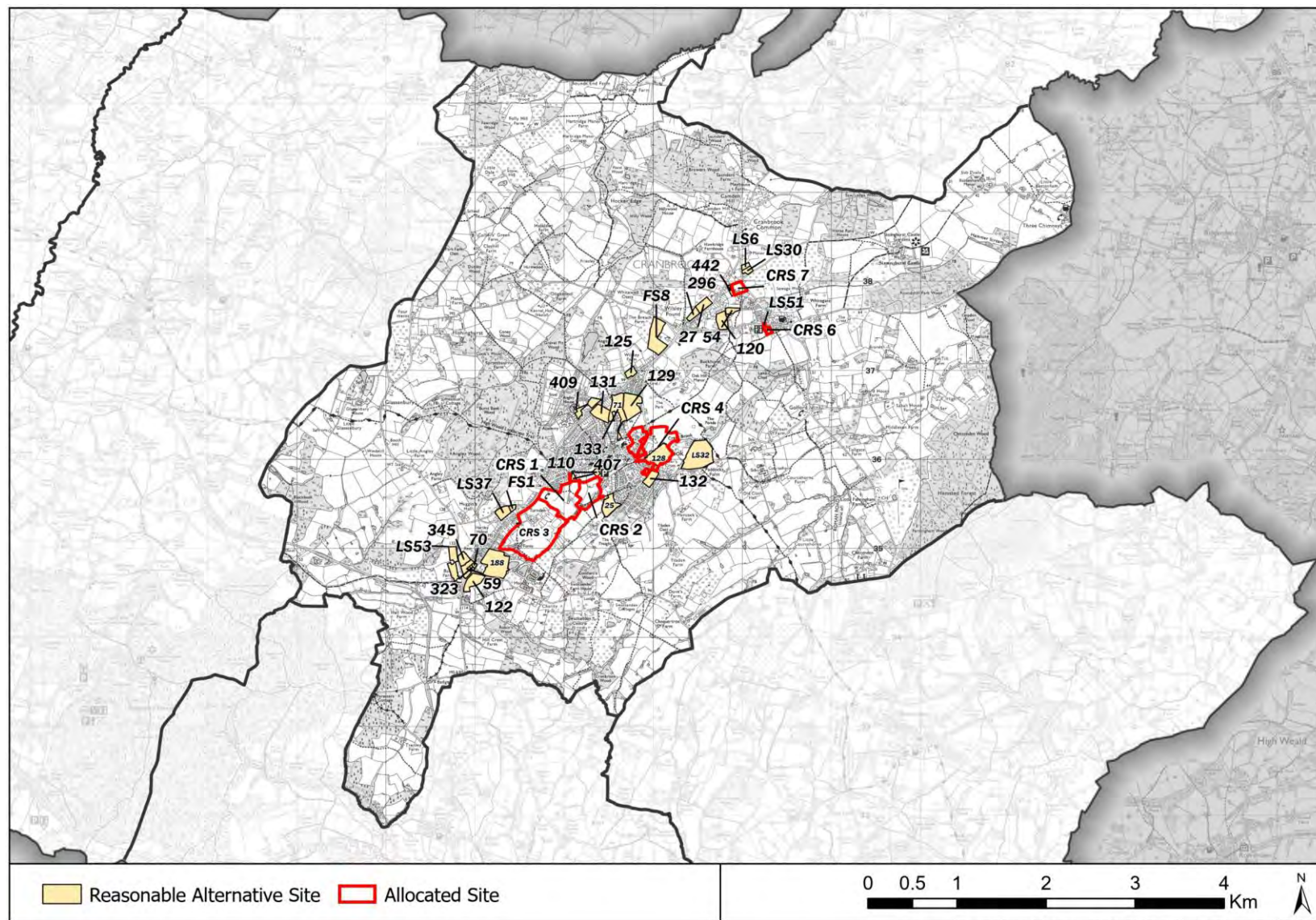


Figure 14. Map of reasonable alternative sites within Cranbrook and Sissinghurst Parish..

Table 54. SA scores for allocated sites in Cranbrook and Sissinghurst Parish.

Sustainability Objective	AL/CRS 1	AL/CRS 2	AL/CRS 3	AL/CRS 4	AL/CRS 5	AL/CRS 6	AL/CRS 7	STR/CRS 1 (cumulative)
Air	0 / -	0	0 / -	?	0 / +	0	0	0 / -
Biodiversity	- / - -	-	- / - -	?	+	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 / -	0 / -
Employment	+	+	+	?	0	+	+	+ / + +
Equality	+	+	+	- / ?	0 / +	+ / + +	0	+
Health	0 / +	0 / +	0 / +	?	0	0 / +	0 / +	+
Heritage	- -	-	- / - -	?	+	0	0 / -	- / - -
Housing	+ + / + + +	+	+ +	?	0	+	+	+ +
Land use	- -	- -	- -	0 / ?	0	- / - -	- / - -	- -
Landscape	-	-	- - / - - -	?	+	- / - -	-	- / - -
Noise	-	0 / -	-	?	0	0	0	-
Resources	0 / ?	0 / ?	+ / ?	?	0	0 / ?	0 / ?	0 / ?
Services & Facilities	0 / -	0 / -	0 / -	?	0 / +	-	-	-
Travel	-	-	-	?	0 / +	0	0 / -	0 / -
Waste	0	0	0	?	0	0	0	0
Water	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 residential housing and education whilst also considering the slightly negative scores for provision of, and access to, services and facilities. Environmental objectives range from 0 to - -. This is indicative of the sensitive environmental features in the parish and relatively large loss of greenfield land. Collectively, the proposed allocations in this parish are within a sensitive landscape and thus do create a negative landscape score overall.

At Draft Local Plan stage, this parish had one of the worse cumulative impacts of all the parishes especially for land use (greenfield, soil loss) and landscape (overall scale out of keeping with settlement, loss of GI), outside of parishes with strategic sites. The heritage score was also highly dependent upon wording in the strategic policy to 'provide a framework for a positive heritage strategy', and had the potential to be more negative.

All Sissinghurst allocations are let down by poorer range of services and facilities than Cranbrook and the relatively large scale of development proposed for the village size at Draft Local Plan stage.

As the Sustainability Appraisal was developed further in 2020, amendments were made to the previously applied scores to address findings of further studies and to address comments raised during consultation in Autumn 2019. This was particularly the case for the objectives of biodiversity, landscape and heritage.

It is noted that the 2020 AONB Setting Analysis Report has revealed potential impact from sites 120 and 159 in this regard and the landscape scores for these sites have been adjusted to reflect this expected short-term impact.

The 2020 Landscape and Visual Impact Assessment study provided additional information about site 430, the Hartley parcel and site LS\_32 and landscape scores for these sites have been adjusted as necessary. Of particular note is the recommendation not to allocate site LS\_32. This advice has resulted in the very negative landscape score being applied.

Likewise, the 2020 Grassland Study concluded that Sites 125, 442, 68 and the western sites at the Hartley parcel were considered to have either ecological or botanical importance (or both) and the biodiversity scores have been adjusted as appropriate.

The removal of some sites for allocation has helped to improve the cumulative impact scores for certain objectives. For example, air quality, climate change, landscape and water scores benefit from the reduced number of dwellings. For other objectives, the reverse is true i.e. fewer dwellings means less support for local business growth and employment. Finally, a deterioration in the cumulative score for



biodiversity since Draft Local Plan stage reflects new information to inform scores for sites.

On the whole, the final selection of sites for allocation provide benefits to environmental, social and economic objectives. Where sites were not allocated but had a better range of scores than the allocated sites, there were frequently reasons outside of the SA remit to consider for example highway problems, access issues or deliverability concerns within the plan period e.g. site 409.

Further commentary can be found in Appendix J.

## Hawkhurst

Table 55. 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 8
78	Land off Cophall Avenue and Highgate Hill, Hawkhurst (including 419)	AL/HA 4
86	Land at Highgate Hill, Hawkhurst (Phase 2)	Not allocated
102	Hawkhurst Station Business Park, Gill's Green TN18 5BD	AL/HA 7
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	Not allocated
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 1
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 5 (part site)
419	Land at Westfield/east of Highgate Hill, Hawkhurst, Kent	AL/HA 4
422	Santers Yard, Gills Green Farm, Gills Green, Hawkhurst	Not allocated
433	OS Plot 7007, Cranbrook Road, Hawkhurst	Not allocated
455	Whitewood Farm, White Lane, Hawkhurst	Not allocated
LS_3	Land to the west of Cranbrook Road, Gills Green	Not allocated
457	Brook House, Cranbrook Road, Hawkhurst	AL/HA 2
SALP AL/H A 5	Site at Sports Pavillion, King George V Playing Fields, The Moor	AL/HA 6

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<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
DPC 22	Trewint Farm, Slipmill Lane, Hawkhurst	Not allocated.
SALP AL/H A 1	Site of former Spring field Nurseries	AL/HA 3

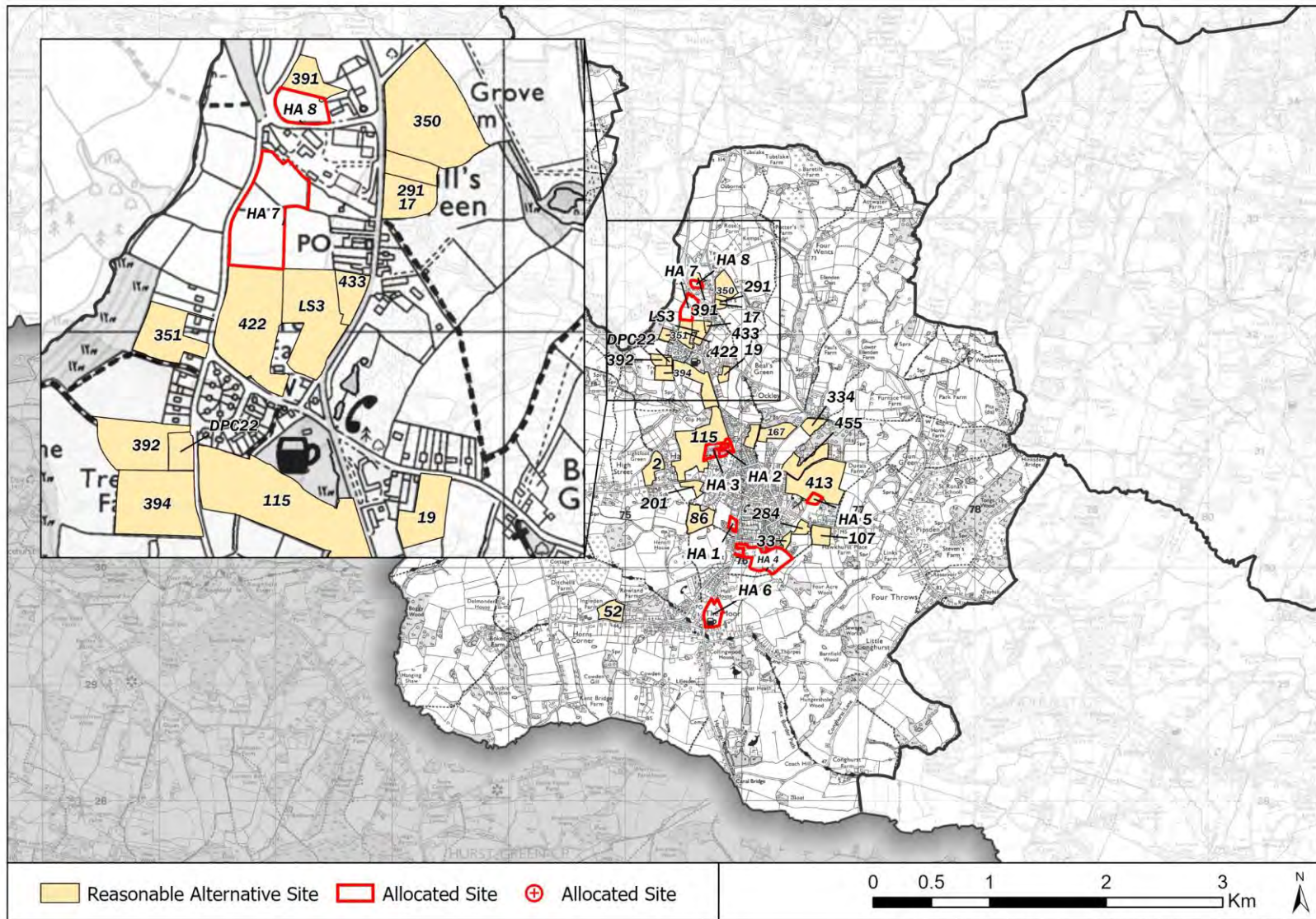


Figure 15. Map of reasonable alternative sites within Hawkhurst Parish.

Table 56. SA scores for allocated sites in Hawkhurst Parish

Sustainability Objective	AL/HA 1	AL/HA 2	AL/HA 3	AL/HA 4	AL/HA 5	AL/HA 6	AL/HA 7	AL/HA 8	STR/HA 1 (cumulative)
Air	0 / -	0 / -	0 / -	-	0	0	-	-	- / - -
Biodiversity	0	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	0	0	0	0	?	?	0 / ?
Education	+	+	+	+	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 / +
Heritage	-	0	0	0	0	0	0	0	0
Housing	+	+	+	++	0	0	0	0	+ / ++
Land use	-	-	-	-	0	0	- / - -	- / - -	- / - -
Landscape	0 / -	0 / -	0 / -	- / - -	0	0	-	-	- / - -
Noise	0 / -	0	0	0 / -	0	0	0	0	0 / -
Resources	?	? / -	? / -	? / -	?	?	0 / ?	?	?
Services & Facilities	0 / +	0 / -	0 / -	0 / -	0 / +	0 / +	0	0	0 / -
Travel	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

All environmental, social and economic objectives have both positive and negative elements to them in this parish thus bring about a mixed score cumulatively.

Collectively, the proposed allocations in this parish are within in a sensitive landscape and thus do create a negative landscape score overall. Likewise, the cumulative score for air quality is negative to reflect the total number of dwellings and to recognise that there is an AQMA on Cranbrook Road which is in the process of being declared. The cumulative air quality score is prevented from being more negative by the commitment in allocation policy to avoid unacceptable impact.

The cumulative effects of the two allocations in Gills Green brings benefits to the Business Growth and Employment objectives. Likewise, the combined effect of the residential housing allocations ensures the housing objective scores positively.

Travel in the parish is most likely to use private car use and development at Gills Green in particular causes the travel objective to be scored negatively at parish level.

Noise scores negative overall to reflect cumulative impact upon the new Important Areas for Road Noise (IARN) at Flimwell and the Water objective is scored as slightly negative to reflect the total scale of development and pressures on supplies.

In some cases, the reasonable alternatives that were not chosen for allocation scored more negatively than those that were not allocated reflecting the scale of the site and/or the sensitivity of the local environment for example sites LS\_3, 52 and 394. In other cases, the allocations were made based on local need for community or employment. For example, employment land at Gills Green or community facilities at King George V recreation ground. Further commentary can be found in Appendix K.

As the Sustainability Appraisal was developed further in 2020, amendments were made to the previously applied scores to address finding of further studies and to address comments raised during consultation in Autumn 2019. This was particularly the case for the objectives of biodiversity, air and landscape.

The 2020 Landscape and Visual Impact Assessment study provided additional information about site 115, 413, 78/419, 102 and 422 and landscape scores for these sites have been adjusted as necessary.

Likewise, the 2020 Grassland Study concluded that Sites 78 and 86 were considered to have either ecological or botanical importance (or both) and the biodiversity scores have been adjusted as appropriate.

The removal of some significant sites for allocation has helped to improve the cumulative impact scores for certain objectives. For example, climate change, landscape, land use, education, heritage and water scores benefit from the reduced number of dwellings. For other objectives, a deterioration in the cumulative score since Draft Local Plan stage reflects new information to inform scores for sites e.g. air, biodiversity and noise.

**Benenden**

Table 57. List of reasonable alternative sites in Benenden Parish

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
158	Land to the rear of Greenacres, The Street, and adjacent to New Pond Road (includes site DPC20)	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 2
424	Land comprising South East Quadrant, Benenden Hospital, Corner of Goddard's Green Road and Green Lane, Benenden, Kent	AL/BE 3 (Part site)
425	Land to the east of Mockbeggar Lane, Benenden, Cranbrook	Not allocated
LS_8	Land south of Chapel Lane, Iden Green, Cranbrook	Not allocated
LS_16	Uphill, New Pond Road, Benenden, Cranbrook	AL/BE 1
LS_21	Little Weavers, Iden Green, Benenden, Cranbrook	Not allocated
LS_40	Land to the south east of Goddards Green Road	AL/BE 3 (Part site)
LS_41	Land at Benenden Hospital	AL/BE 4

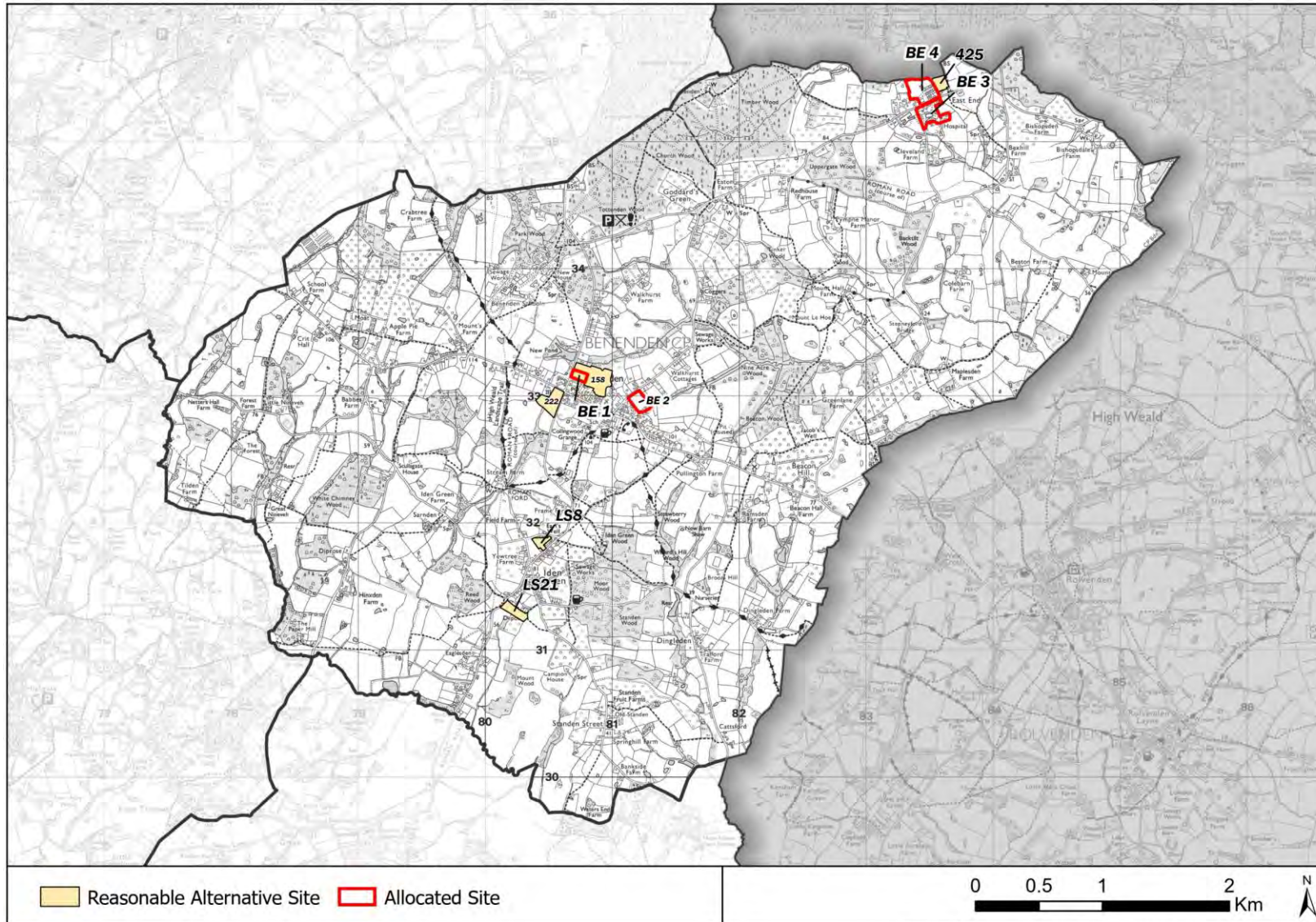


Figure 16. Map of reasonable alternative sites within Benenden Parish.



Table 58. SA scores for allocated sites in Benenden Parish

Sustainability Objective	AL/BE 1	AL/BE 2	AL/BE 3	AL/BE 4	PSTR/BE 1 (cumulative)
Air	0 / -	0 / -	-	-	-
Biodiversity	-	0 / -	-	- / - -	- / - -
Business Growth	0	0	0 / +	0 / +	0 / +
Climate Change	0	0	? / -	? / -	? / -
Deprivation	0	0	0	0	0
Education	+	+	+	+	+
Employment	+	+	+	+	+
Equality	+	+	-	-	0 / -
Health	0	0	0	0	0
Heritage	-	-	0 / -	0	0 / -
Housing	+	+	+	+	+
Land use	- / - -	- / - -	+	+	0
Landscape	-	-	0	0	-
Noise	0	0	0	0	0
Resources	?	0 / ?	- - / ?	- - / ?	?
Services & Facilities	- / - -	- / - -	- - / - - -	- - / - - -	- -
Travel	-	-	- -	- -	- -
Waste	0	0	0	0	0
Water	0	0	0	0	0 / -

### Commentary

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.

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.

Further commentary can be found in Appendix L. In light of the alternatives, the above options were chosen for allocation because they provided the best scores particularly with regard to the heritage, landscape and travel objectives.

The 2020 Grassland Study shows site LS\_16 has moderate-low botanical importance and moderate ecological importance thus the score for biodiversity has changed to reflect this.

## **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. No other reasonable alternatives were identified given the constraints of the parish.
- 8.2.7 The Local Plan contains a Strategic Policy for the parish (PSTR/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 59. 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	Not allocated
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	Not allocated
393	Town Farm, Palmers Green Lane, Brenchley, Tonbridge	Not allocated
401	Land at Maidstone Road, Matfield	AL/BM 2
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
LS_7	Land at Little Puxted, High Street, Brenchley, Tonbridge	Not allocated
LS_27	Land between Brenchley Road, Coppers Lane and Maidstone Rd, Matfield	AL/BM 1
LS_33	Land off of Brenchley Road, Brenchley	Not allocated
LS_34	Land at Market Heath, Brenchley	Not allocated
LS_35	Land to the south of the Memorial Hall, Brenchley	Not allocated
LS_46	Land off Maidstone Road Matfield	Not allocated
LS_47	Land at Friars, Matfield	Not allocated
n/a	A21 Improvements between Kippings Cross and Lamberhurst	TP 6

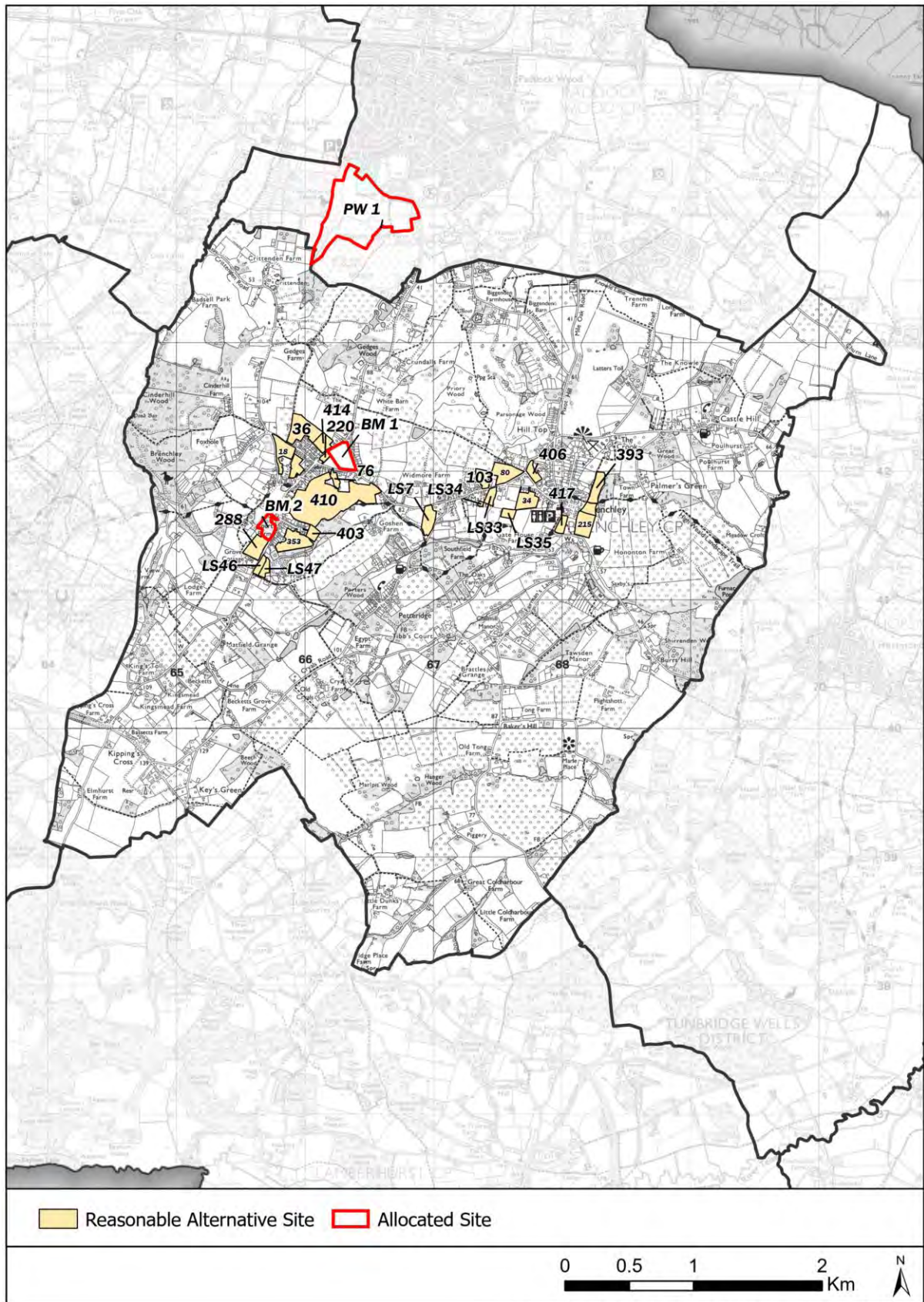


Figure 17. Map of reasonable alternative sites within Brencley and Matfield Parish.

Table 60. SA for allocated sites in Brenchley and Matfield Parish

Sustainability Objective	AL/BM 1	AL/BM 2	PSTR/BM 1 (cumulative)
Air	0 / -	0 / -	0 / -
Biodiversity	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 / -
Housing	0 / +	0 / +	0 / +
Land use	--	--	-- / ---
Landscape	- / --	0 / -	-
Noise	0	0	0
Resources	0 / ?	0 / ?	?
Services & Facilities	- / --	- / --	- / --
Travel	0 / -	0 / -	0 / -
Waste	0	0	0
Water	0	0	0 / -

### Commentary

The cumulative assessment (PSTR/BM 1) assigns 6 neutral scores, 2 slightly positive scores, and 10 negative scores for the proposed development in the parish of Brenchley and Matfield.

Environmental scores are neutral or negative, social scores range from very negative to slightly positive, and economic scores range from positive to negative.

Whilst a road scheme covered by policy TP 6 does fall within the parish boundaries, it is not given great weight when determining cumulative impacts as there is no certainty that the scheme would be delivered (policy safeguards the route only).

The policies in this parish represent a reasonable score for the housing objective. However, the scores are diminished by the fact that Matfield (where all 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 more convenient from Matfield and thus there is an advantage in this proposed pattern of growth. The negative land use score is due to all policies representing a loss of BMV soils and the negative landscape score reflects all sites being located within the AONB. Water and education scores reflect the pressures of 90 new dwellings on existing services.

Generally, sites in Brenchley were rejected for allocation due to landscape, biodiversity and/or setting concerns for example sites 215 and LS\_7. The most preferable sites were those which aligned well with the existing settlement pattern and provided the best balance between the social, economic and environmental

objectives.

There are several reasonable alternative sites that score better than the allocated sites e.g. sites 220, 76, 288, 403, 406 and LS\_33 (see Appendix M). However, the SHEELA notes explain they are unsuitable for allocations for reasons such as not being logical extensions to the LDB, lack of appropriate access and uncertainty about delivery. These are all aspects the SA does not consider.

Since Draft Local Plan stage, cumulative impact scores for landscape and heritage have been improved following the removal of Site 253 for allocation. Site 353 was a relatively large site in a location out of keeping with the existing settlement pattern with some adverse landscape impacts, as well as having regard to the overall limited services role of the settlement.

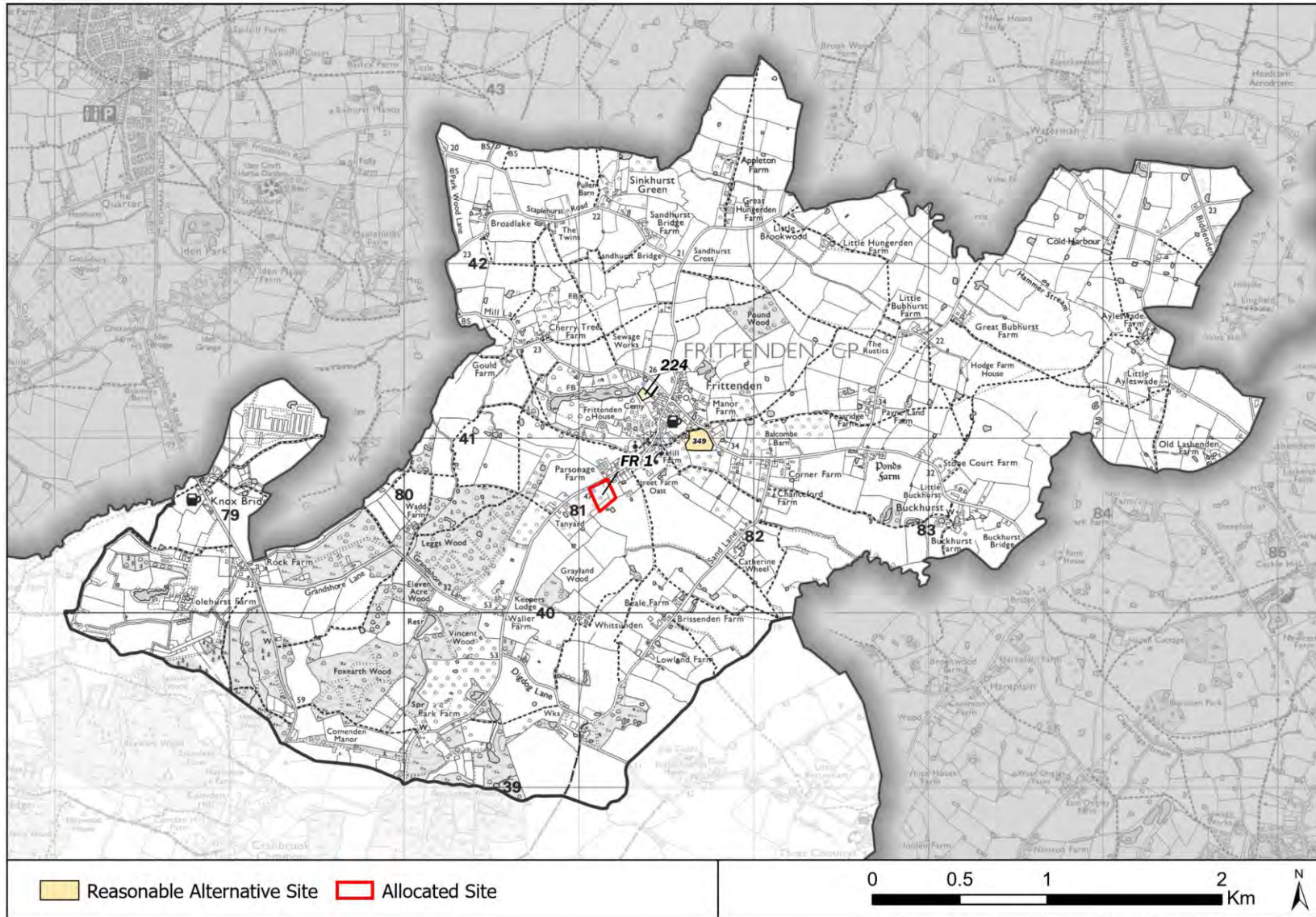
Commentary for all reasonable alternatives in this parish can be found in Appendix M.

## Frittenden

Table 61. List of reasonable alternative sites in Frittenden Parish

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
349	Pound Hill Field, Biddenden Road, Frittenden	Not allocated
LS_28	Land at Cranbrook Road, Frittenden	AL/FR 1

8.2.8 Two reasonable alternative 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). This site is retained in the Pre-Submission Local Plan; hence, the cumulative impact assessment is therefore identical to the scores for late site 28. See Appendix N for full details on this site.



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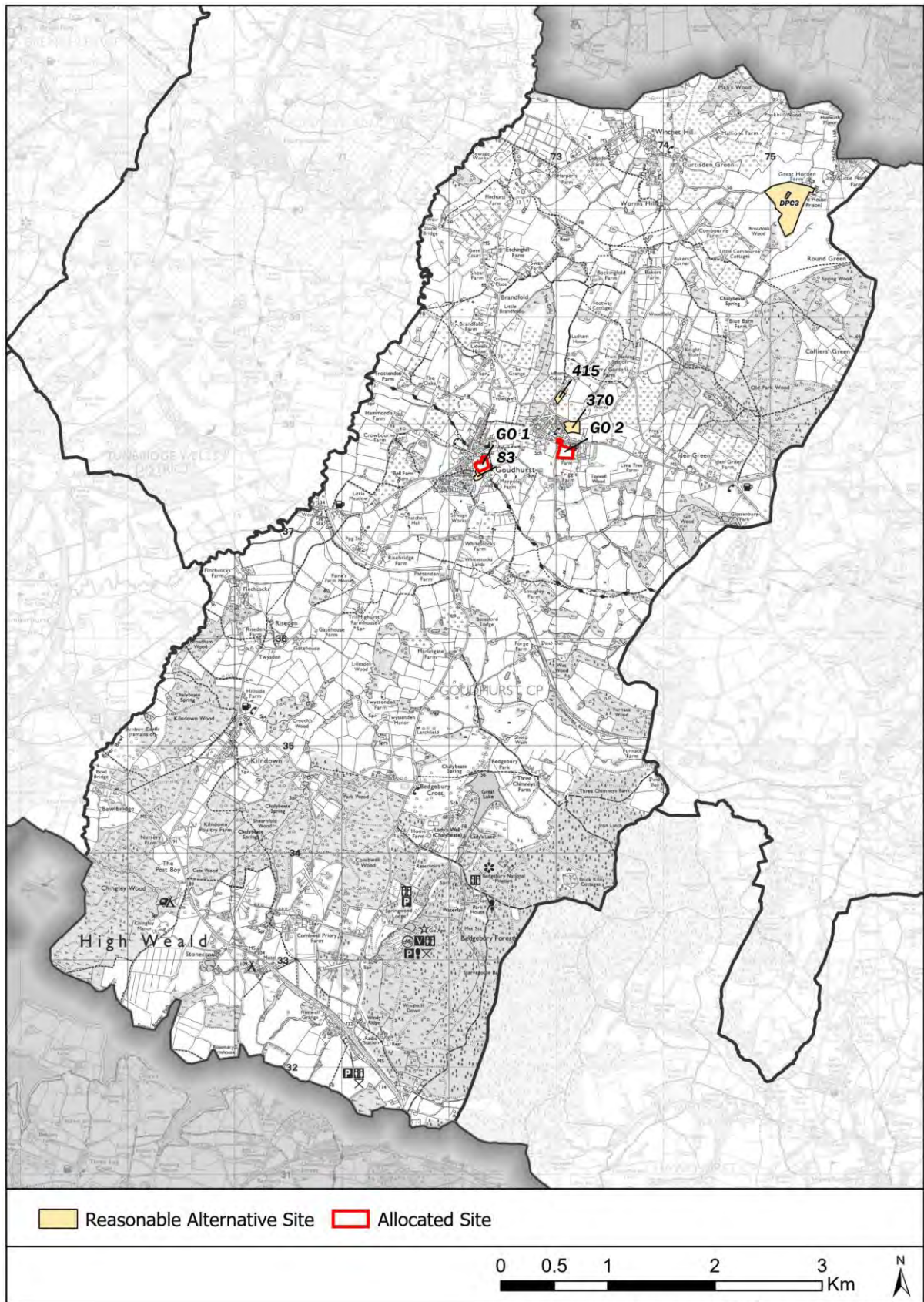
Figure 18. Map of reasonable alternative sites within Frittenden Parish..



## Goudhurst

Table 62. List of reasonable alternative sites in Goudhurst Parish

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
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
DPC_3	Blantyre House	Not allocated



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

Table 63. SA scores for allocated sites in Goudhurst Parish

Sustainability Objective	AL/GO 1	AL/GO 2	PSTR/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

The cumulative impacts of development in this parish (PSTR/GO 1) are mostly neutral. The scores for all three pillars of sustainable development 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.

The limited range of services and facilities is the largest detractor from development in this parish. Loss of greenfield land within a sensitive landscape is also reflected negatively in the cumulative assessment scores. Travel options are limited with active travel less likely due to steep topography and narrow roads. The nearest train station at Marden is relatively near but the direct bus service is poor thus private car use is likely to dominate. The education score reflects the capacity of the existing service rather than the pressures of 26 new dwellings. The creation of temporary construction jobs allows the employment objective to be positive. However, this objective is afforded low weighting overall as unemployment in the borough is generally low.

In comparison to the Reasonable Alternatives shown in Appendix O, the allocated sites above have a better outcome for the sensitive AONB landscape and heritage environment. The allocated sites also score more positively on the equality objective as are more accessible, including for people with mobility impairments.

Further commentary can be found in Appendix O.

## Horsmonden

Table 64. 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
82	Land adjacent to Bassetts Farm Goudhurst Road, Horsmonden TN12 8AS	AL/HO 3
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 3
162	Land south of Brenchley Road and west of Fromandez Drive, Horsmonden	AL/HO 2
207	Land to the rear of Kirkins Close and Willard Place, Horsmonden	Not allocated
297	Bassetts Farm, Goudhurst Road, Horsmonden	AL/HO 3
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 3
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
LS_42	Land adjacent to Apple Tree Cottage, Horsmonden	Not allocated

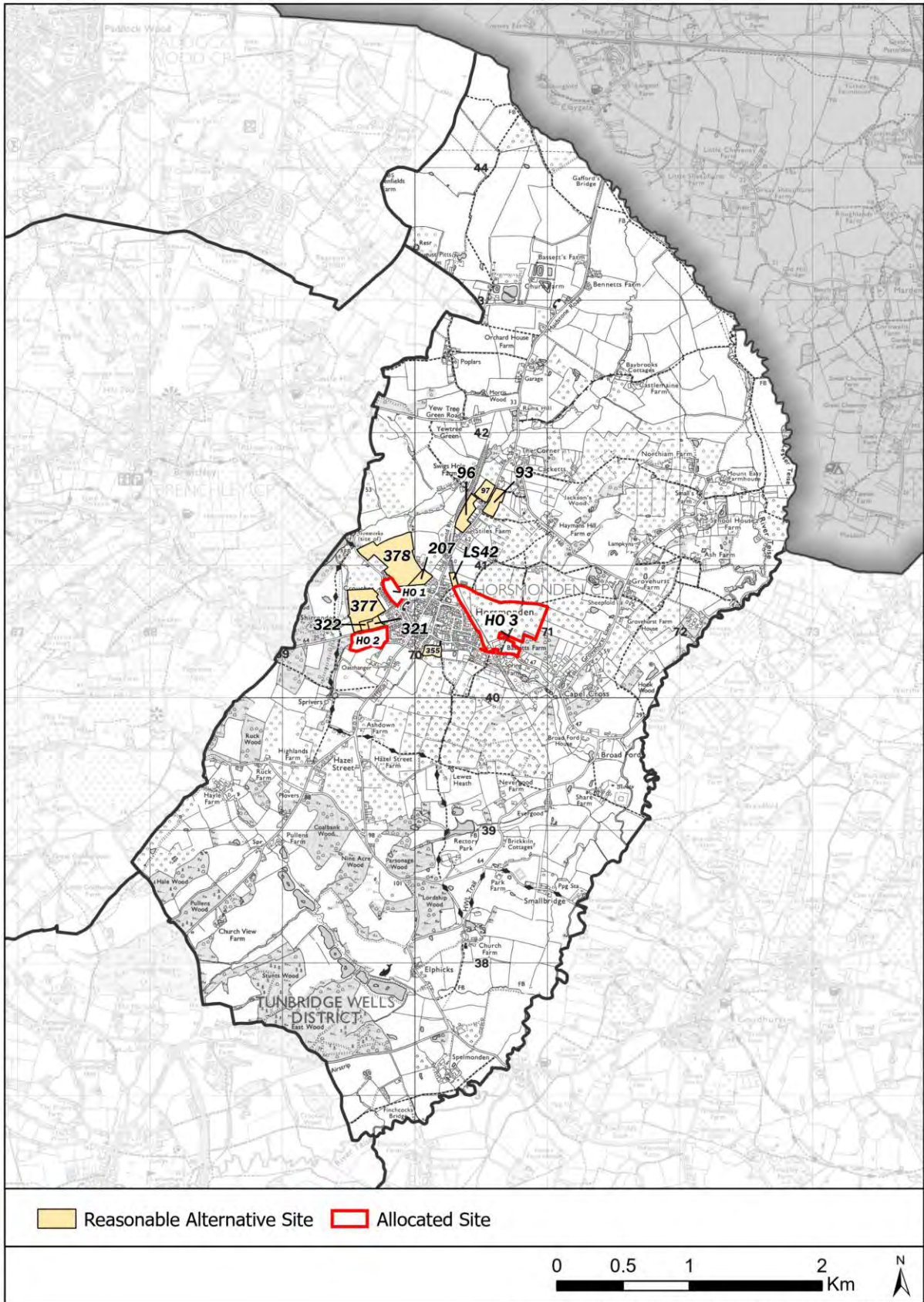


Figure 20. Map of reasonable alternative sites within Horsmonden Parish.

Table 65. SA scores for allocated sites in Horsmonden Parish

Sustainability Objective	AL/HO 1	AL/HO 2	AL/HO 3	PSTR/HO 1 (cumulative)
Air	0 / -	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 / +
Employment	+	+	+	+
Equality	+	+	+	+
Health	0	0	0	0
Heritage	0	-	-	-
Housing	+	+ / ++	++	++
Land use	--	-	--	--
Landscape	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

The cumulative impacts of development in this parish (PSTR/HO 1) are mixed.

Economic impacts range from positive to negative reflecting the positive impact that a relatively large number of new dwellings and new residents could have in supporting local businesses, and the improvement that a new GP surgery and village hall brings for the services and facilities objective. Social impacts all score as positive except health (neutral) and travel (negative). Environmental impacts score as negative to neutral, largely reflecting the potential for impact upon some sensitive landscape and heritage features such as the setting of the AONB. It is noted that the 2020 AONB Setting Analysis Report has revealed potential impact from AL/HO 3 in this regard and the landscape score has been adjusted to reflect this expected short-term impact. The cumulative score has not been adjusted as the impact is expected to diminish in the long-term such that it is no longer considered significant.

As for all small rural settlements, one of the main detractors from this settlement is the lack of local facilities and private car use dependency. This is reflected in scores for air, transport and services. Water and education scores reflect the increased pressure on existing services (with allowances made to account the intention to safeguard land for education).

Generally, allocated sites are given less negative scores than those deemed unsuitable for allocation especially in relation to the environmental objectives of land use, landscape and heritage. Exceptions occur in the case of Sites 355 and LS\_42.

However, these sites have significant access difficulties which the SA does not score directly.

Further commentary can be found in Appendix P.

Since draft Local Plan stage, numerous updates have been made to the scores for reasonable alternatives. These are summarised below:

- Education score for Site 162 (now AL/HO 2) has been updated since Draft Local Plan stage to better reflect the pressures on existing services. However, the cumulative impact score remains unchanged as the parish will benefit from the safeguarded land for education.
- Heritage score for the reasonable alternative Site 207 has declined to reflect detailed investigations that were undertaken as a result of the recent planning application that was subsequently refused. Likewise, the heritage score for reasonable alternative Site 321 has been reduced to reflect the impact upon the setting of the adjacent listed building.
- Biodiversity score for the reasonable alternative Site 321 has declined to better reflect the large pond on site.

## Lamberhurst

Table 66. List of reasonable alternative sites in Lamberhurst Parish

<b>Site Ref</b>	<b>Site Address</b>	<b>Policy Ref</b>
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	Land to the west of Spray Hill	AL/LA 1
285	Misty Meadow, Furnace Lane, Lamberhurst	Not allocated
363	Land at 36 Brewer Street, Lamberhurst	Not allocated
423	Lamberhurst Winery, Lamberhurst Down, Lamberhurst	Not allocated
LS_36	Land at Whisketts Farm, Lamberhurst, TN3 8JG	Not allocated
FS3	Heathertye, Mount Pleasant Lane, Lamberhurst	Not allocated
n/a	A21 Improvements between Kippings Cross and Lamberhurst	TP 6



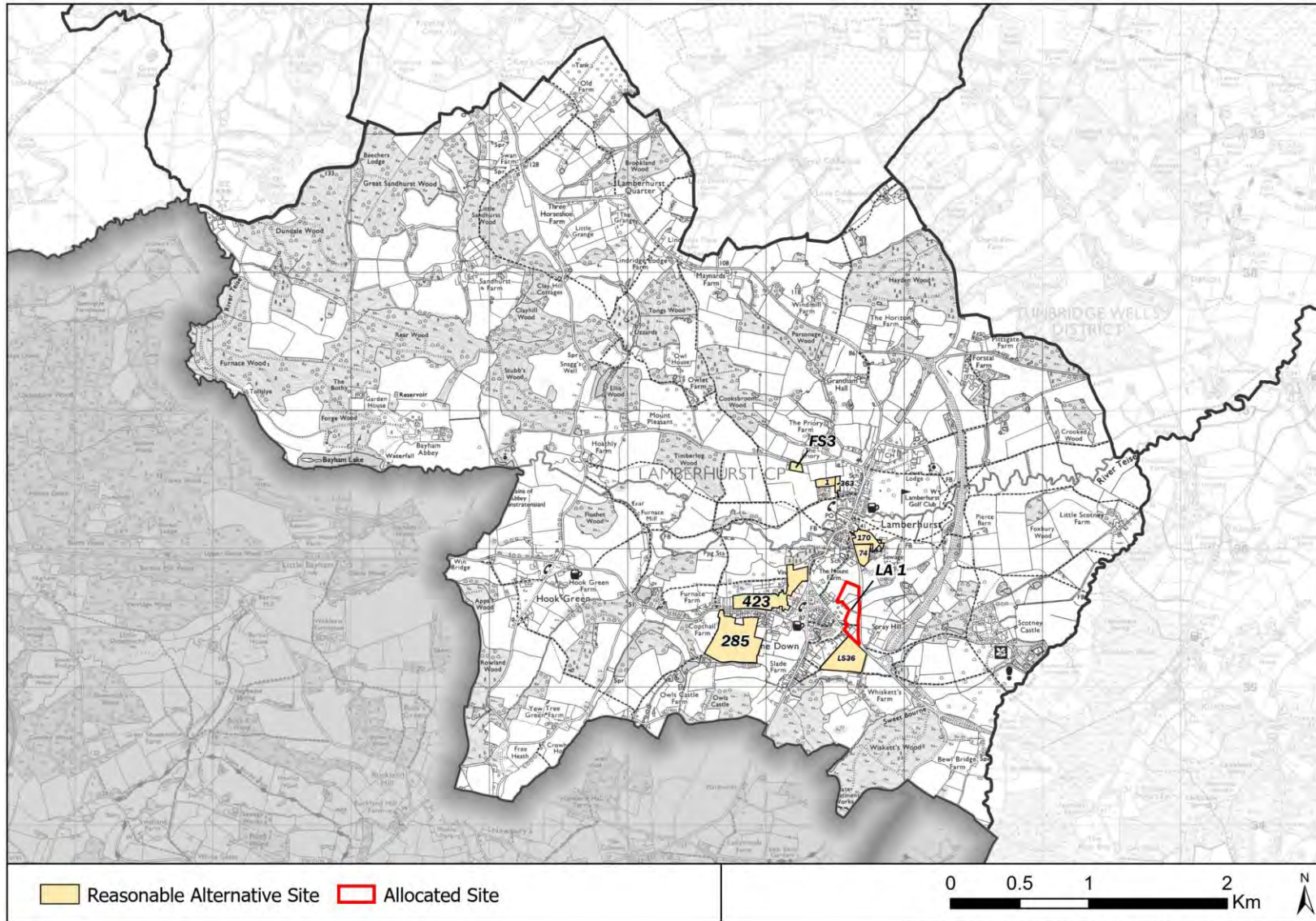


Figure 21. Map of reasonable alternative sites within Lamberhurst Parish..

- 8.2.9 Nine sites (excluding KC\_1) came forward in Lamberhurst parish during the call for sites process but only one of these has been allocated for development in the Local Plan (site 279). The cumulative impact assessment is therefore identical to the scores for this site. Generally, all sites in this parish were let down by the limited range of facilities, services and transport options. Site 279 scored the most positively of all these sites and therefore was recommended for allocation. The remaining sites scored more negatively for landscape, heritage and/or water reflecting the sensitive AONB location and flood zones.
- 8.2.10 See Appendix Q for full details on this site. It should be noted that scores have been reviewed and updated to address comments made during consultation in Autumn 2019.
- 8.2.11 Whilst a road scheme covered by policy TP 6 does fall within the parish boundaries, it is not given great weight when determining cumulative impacts as there is no certainty that the scheme would be delivered (policy safeguards the route only).

## Pembury

Table 67. 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)	AL/PE 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	AL/PE 1
136	Land at Notcutts Garden Centre, Tonbridge Road, Pembury, TN2 4QN	Not allocated
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
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 Downingbury Farm, Rowley Hill, Pembury	AL/PE 4
379	Land at Henwood Green Road (including site 458)	Not allocated
390	30 & 30A Hastings Road, Pembury, Kent	AL/PE 2
395	Woodsgate Corner, Pembury, Tunbridge Wells	AL/PE 6
444	Land to the north of Tunbridge Wells Hospital, Tonbridge Road, Pembury, Tunbridge Wells	Not allocated
LS_5	Dayspring Cottage, 55 High Street, Pembury, Tunbridge Wells	AL/PE 1
LS_13	Owlsnest Wood, Tonbridge Road, Pembury, Tunbridge Wells	AL/PE 8
n/a	A228 Strategic Link	TP 6
460	Cornford Court, Cornford Lane, TN2 4QX	AL/PE 7
458	Land at Sturgeons fronting Henwood Green Road	AL/PE 5

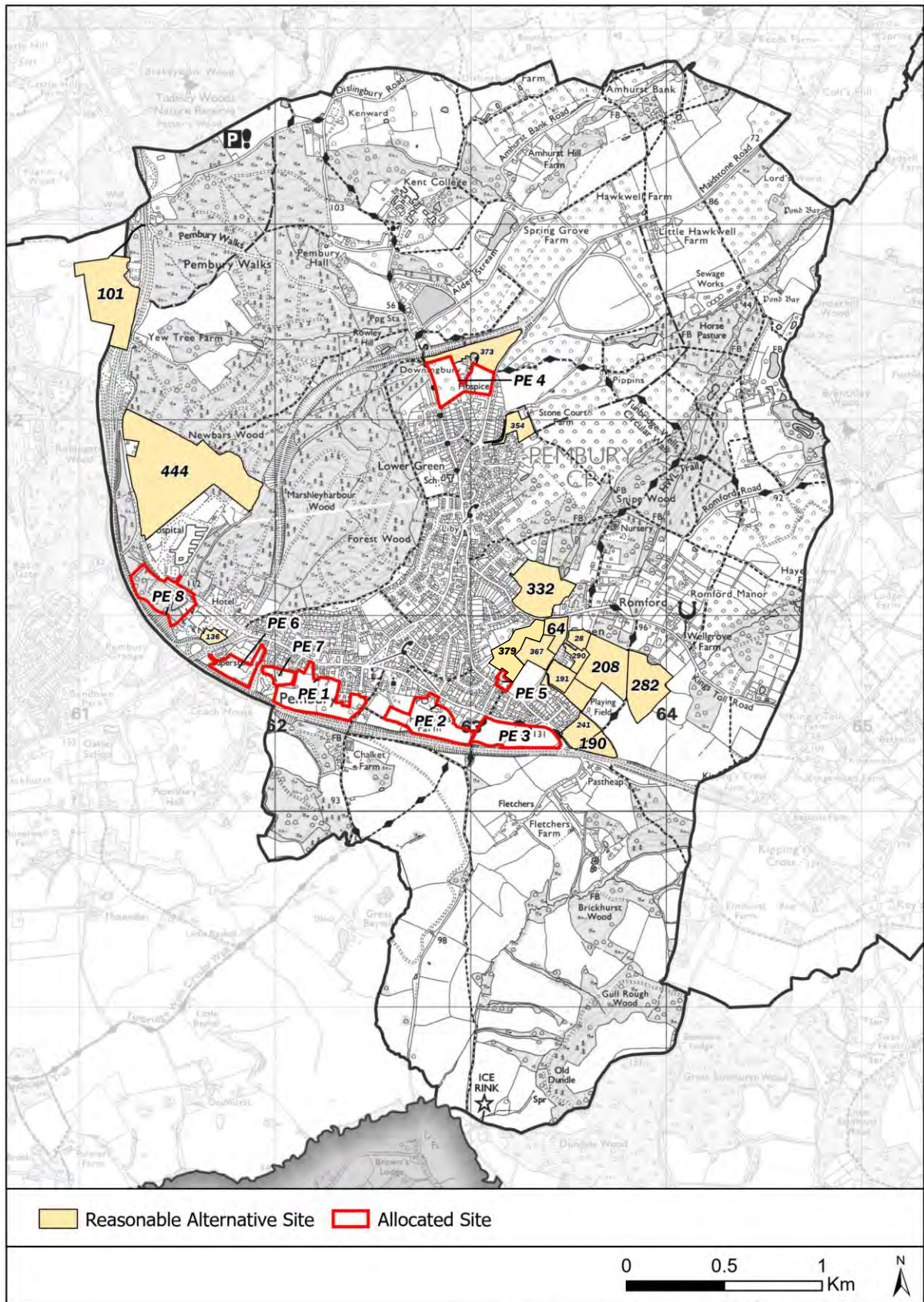


Figure 22. Map of reasonable alternative sites within Pembury Parish.

Table 68. SA scores for allocated sites in Pembury Parish

Sustainability Objective	AL/PE 1	AL/PE 2	AL/PE 3	AL/PE 4	AL/PE 5	AL/PE 6	AL/PE 7	AL/PE 8	PSTR/PE 1
Air	0	0	0	0/-	0/-	0	0	0/-	0/-
Biodiversity	-	0/-	0	0	0	0/-	0/-	-	0/-
Business Growth	0	0	0	0	0/-	+	+	+	+ / ++
Climate Change	?/-	?/-	?/-	?/-	0	?/-	?/-	?/-	?/-
Deprivation	0	0	0	0	0	0	0	0	0/+
Education	+	+	+	+	+	+	+	0	+
Employment	+	+	+	+	+	+ / ++	+ / ++	+ / ++	++
Equality	+	+	+	0/+	0/+	+	+	+	+
Health	0	0	0	0/+	0	++	+ / ++	+ / ++	++
Heritage	-	-	0/-	-	0/-	0	0	0	-
Housing	+ / ++	+ / ++	+ / ++	0/+	0/+	0	0	0	++
Land use	-	-	-	- / --	0/+	0/-	-	0/-	- / --
Landscape	-	-	-	-	0/-	0/-	0/-	0/-	- / --
Noise	-	-	-	0/-	0	-	-	-	- / --
Resources	- / ?	- / ?	0 / ?	0 / ?	- / ?	- / ?	-- / ?	?	?
Services & Facilities	0/-	0/-	0/-	0/-	0/-	0/-	0/-	0/-	-
Travel	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/-	-

## **Commentary**

The cumulative impacts of development in this parish (PSTR/PE 1) are 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.

The score for the education objective is a combination of the adverse effects that come from the cumulative pressures that the new dwellings could place on the existing school which does not have room for expansion. Despite the benefits of policy TP 6, the cumulative effects of all the proposed developments has resulted in a slightly negative air quality score overall. The contributions that will be collected from all developments to enhance active travel prevent this score from being any more negative (likewise the travel objective). The services and facilities objective scores slightly negative overall and is linked to the access to existing services. The water objective is influenced by the groundwater source protection zones across the parish and also the pressure that approximately 400 new dwellings has on supplies.

Whilst a road scheme covered by policy TP 6 does fall within the parish boundaries, it is not given great weight when determining cumulative impacts as there is no certainty that the scheme would be delivered (policy safeguards the route only).

Further commentary can be found in Appendix R.

In most cases, sites chosen for allocation had a more positive range of scores than those that were rejected. For example, sites 64, 290, 332, 367 and 373 which all experience negative effects due to their location further out from on the edge of the settlement.

However, in some circumstances, sites with similar or better scores to the allocated sites were rejected for reasons outside of the SA remit. For example, sites 191 and 290 are likely to be undeliverable due highway and/or access concerns.

## Rusthall

Table 69. 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
SALP AL/RTW 9	Lifestyle Motor Europe, Langton Road	AL/RU 1

8.2.12 Four 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 SALP AL/RTW 9). Site SALP AL/RTW 9 scored the most positively of all these sites and therefore was recommended for allocation. The other reasonable alternatives all scored more negatively for land use and heritage reflecting the sensitive Green Belt location. The cumulative impact assessment is therefore identical to the scores for site SALP AL/RTW 9. See Appendix S for full details on this site.

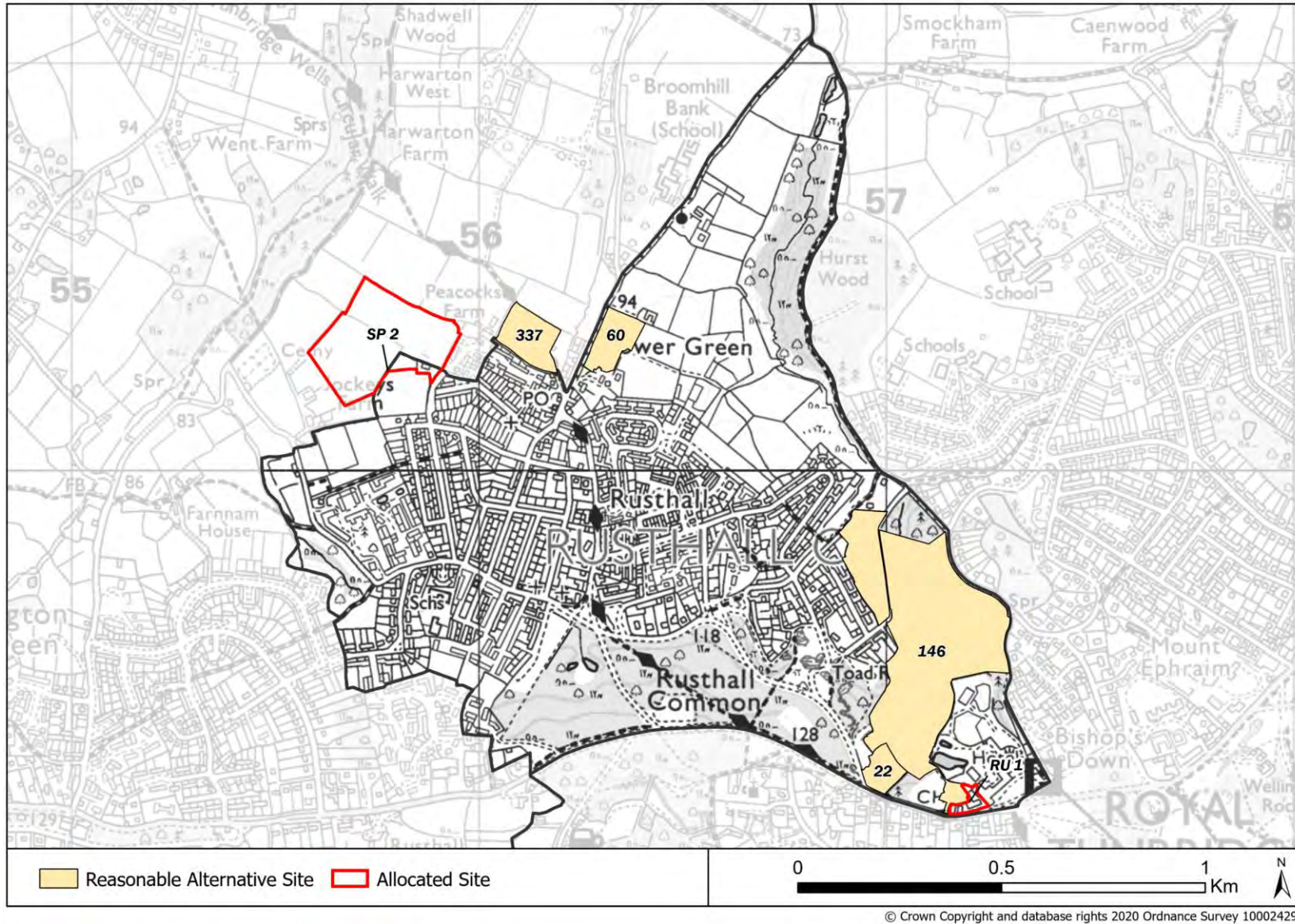


Figure 23. Map of reasonable alternative sites within Rusthall Parish



## Sandhurst

Table 70. List of reasonable alternative sites in Sandhurst Parish

Site Ref	Site Address	Policy Ref
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	Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane, Sandhurst, TN18 5JL	AL/SA 1
299	Oaklands Farm, Bodiam Road	Not allocated
320	Land at Old Well House, Rye Road	Not allocated
LS_11	Kerrys Yard (New yard), Bodiam Road	Not allocated
LS_50	Land to the rear of Sandhurst Farm Shop, Queen Street	Not allocated
DPC_12	Sharps Hill Farm, Queen Street	AL/SA 2
FS2	Field to the south of Bodiam Road, Sandhurst	Not allocated

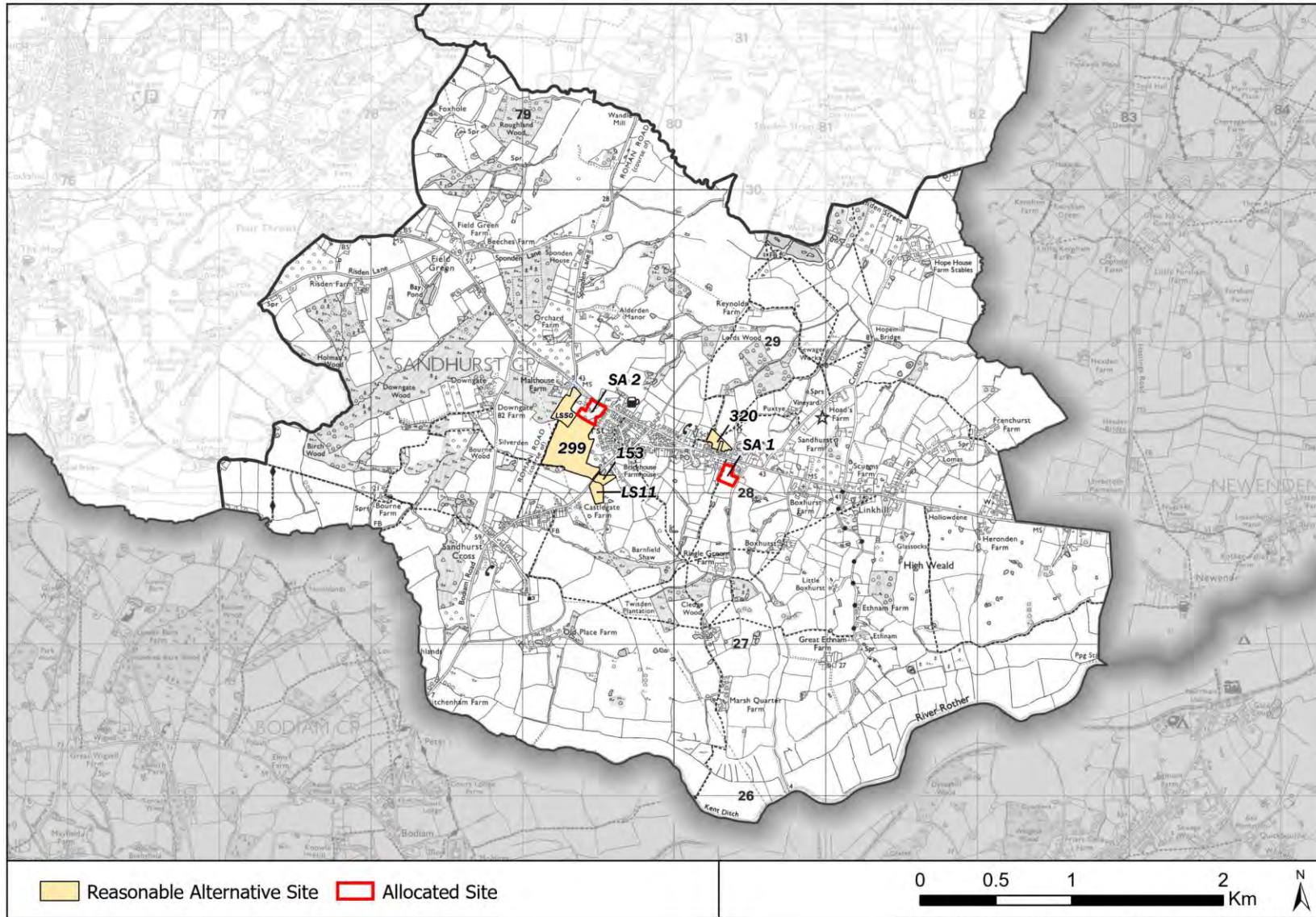


Figure 24. Map of reasonable alternative sites within Sandhurst Parish.

Table 71. SA scores for allocated sites in Sandhurst Parish

Sustainability Objective	AL/SA 1	AL/SA 2	PSTR/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 / -	0 / -
Housing	0 / +	0 / +	0 / +
Land use	-	0 / -	0 / -
Landscape	0 / -	0 / -	0 / -
Noise	0	0	0
Resources	0 / ?	-- / ?	0 / ?
Services & Facilities	- / --	- / --	- / --
Travel	- / --	- / --	- / --
Waste	0	0	0
Water	0 / +	0 / +	0 / +

### Commentary

The cumulative impacts of development in this parish (PSTR/SA 1) tend towards neutrality but are mixed overall. They were judged not to be significantly different from the scores for the individual sites because the number of dwellings recommended for each allocation was relatively small. Economic and social impacts range from negative to positive. Environmental impacts range from slightly negative to slightly positive.

Generally, allocations in this parish are let down by poor services and transport options. In addition, risk to the AONB and heritage assets are present.

These sites were selected for allocation because the alternatives had more negative scores for the environmental objectives and, in the case of sites LS\_11 and LS\_50, slightly more negative travel scores reflecting the more distant location of these sites in relation to services and facilities. Further commentary can be found in Appendix T

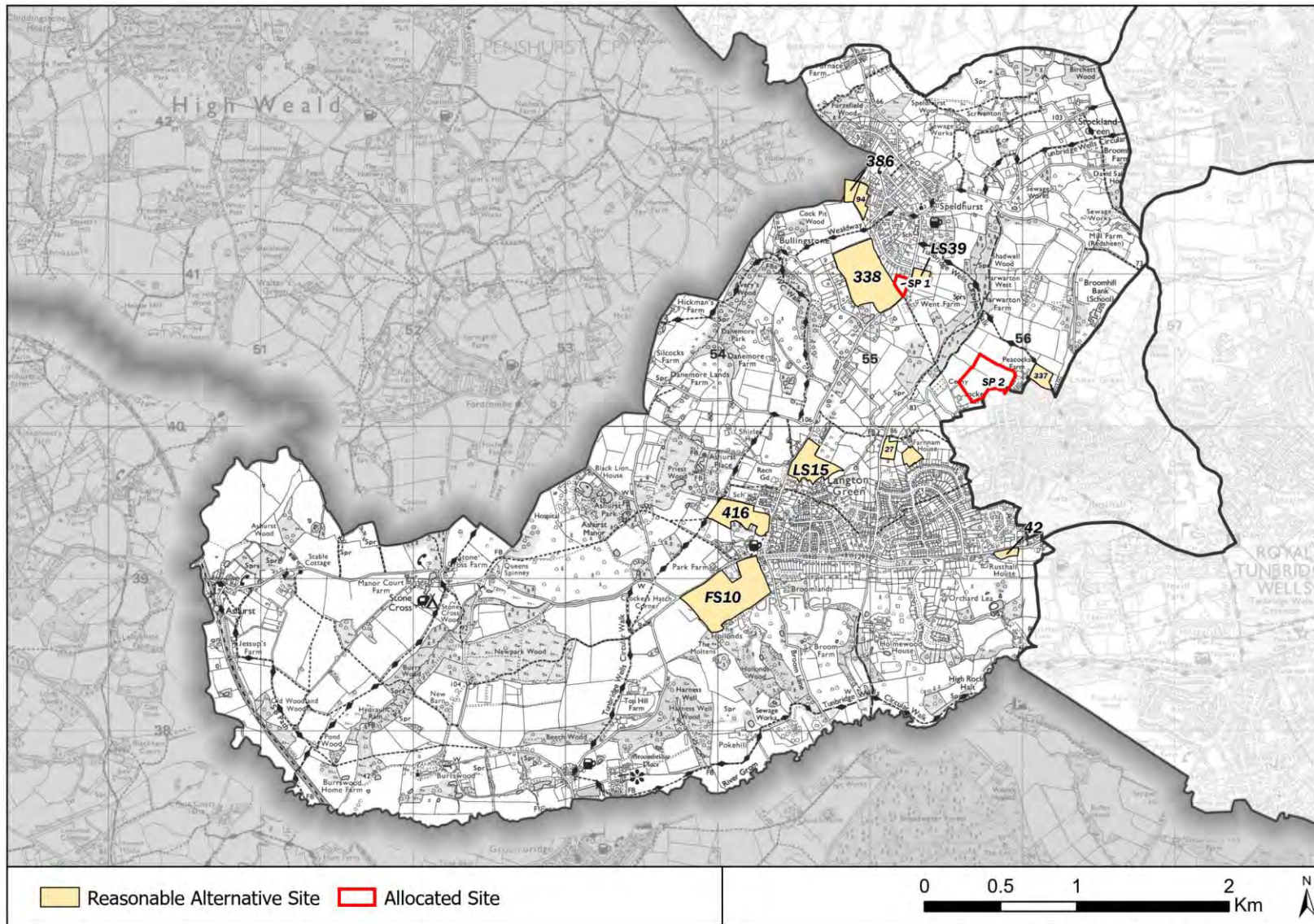
Site 147 was previously allocated as Policy Ref AL/SA 2 in the Draft Local Plan. This site has now received planning permission for a development with a number of dwellings that does not meet the threshold for consideration described in paragraph 8.1.3 and thus has now been filtered out from the list of reasonable alternatives in Table 70 above.

Finally, a Grassland Study was undertaken in 2020 and determined that there was low botanical and moderate-low ecological interest on AL/SA 1. The score for biodiversity remains unchanged.

## Speldhurst

Table 72. 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, Peshurst Road, Speldhurst, TN3 0PH	Not allocated
231	Land to the west of Langton Road and south of Ferbies, Speldhurst, TN3 0NS	AL/SP 1
239	Land at and adjacent to Rusthall recreation ground, Southwood Road (incorporating the existing recreation ground)	AL/SP 2
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, Peshurst Road, Speldhurst, Tunbridge Wells	Not allocated
416	Land North of Langton House, Langton Green	Not allocated
LS_15	Heron's Oast Farm, Speldhurst Road, Langton Green, Tunbridge Wells	Not allocated
LS_39	Dragonfly Farm, Langton Road, Speldhurst TN3 0NR	Not allocated
FS_10	Land at Hollands Farm, Speldhurst	Not allocated



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Figure 25. Map of reasonable alternative sites within Speldhurst Parish.

Table 73. SA scores for allocated sites in Speldhurst Parish

Sustainability Objective	AL/SP 1	AL/SP 2	PSTR/SP 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	0 / +
Land use	-	0 / -	0 / -
Landscape	0 / -	-	-
Noise	-	0	0 / -
Resources	0 / ?	0	0
Services & Facilities	-	0 / +	0 / -
Travel	0 / -	0	0 / -
Waste	0	0	0
Water	0 / +	0	0

### Commentary

The cumulative impacts of development in this parish (PSTR/SP 1) are largely neutral or slightly positive or negative. Economic impacts range from + to 0 / -. Social impacts range from + to -. Environmental impacts range from 0 to 0 / - with no positive scores.

The reasonable alternatives in Speldhurst parish are found in Appendix U. Sites 94 and 337 were similar to AL/SP 1 but scored slightly more negatively to reflect the difficulty of providing access. For this reason, it was not recommended that these sites be allocated. Likewise, sites 27, 42, 338, 386, and LS\_15 had several highly negative scores reflecting either the scale of the site or the environmentally sensitive location (or both) and were not recommended for allocation. Further commentary can be found in Appendix U.

Since DLP stage, the size of AL/SP2 (previously AL/SP3) has increased to incorporate an existing recreation ground, giving potential for further space for overspill parking and the option for enhanced sport and recreation facilities. Differences are not expected to be significant and thus scores are unchanged.

Finally, a Grassland Study was undertaken in 2020 and determined that there was low botanical and ecological interest on AL/SP 1 thus the score for biodiversity remains unchanged.

## 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 Pre-Submission Local Plan is the last 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. The Draft Local Plan built on the Issues and Options document and the feedback received during consultation. Its Development Management policies were based on the continuation of these themes, which are retained in the Pre-Submission Local Plan. They address the following topic areas:

- Environment and Design
- Natural Environment
- Air, Water, Noise, and Land
- Delivery of housing
- Types of housing delivery
- Employment Provision
- Town, Rural Service, Neighbourhood, and Village Centres
- Transport and Parking
- Open Space, Sport, and Recreation

9.1.3 Table 74 provides a full list of the Development Management Policies.

Table 74. List of Development Management policies

Theme	Ref	Title
Environment and Design	EN 1	Sustainable Design
	EN 2	Sustainable Design Standards
	EN 3	Climate Change Mitigation and Adaptation
	EN 4	Historic Environment

Theme	Ref	Title
	EN 5	Heritage Assets
	EN 6	Shop Fronts
	EN 7	Advertisements
	EN 8	Outdoor Lighting and Dark Skies
Natural Environment	EN 9	Net Gains for Nature: biodiversity
	EN 10	Protection of designated sites and habitats
	EN 11	Ashdown Forest Special Protection Area and Special Area of Conservation
	EN 12	Trees, Woodlands, Hedges, and Development
	EN 13	Ancient Woodland and Veteran Trees
	EN 14	Green, Grey, and Blue Infrastructure
	EN 15	Local Green Space
	EN 16	Landscape within the built environment
	EN 17	Arcadian Areas
	EN 18	Rural Landscape
	EN 19	High Weald Area of Outstanding Natural Beauty (AONB)
	EN 20	Agricultural Land
Air, Water, Noise and Land	EN 21	Air Quality
	EN 22	Air Quality Management Areas (AQMA)
	EN 23	Biomass Technology
	EN 24	Water Quality, Supply, and Treatment
	EN 25	Flood Risk
	EN 26	Sustainable Drainage
	EN 27	Noise
	EN 28	Land Contamination
Delivery of Housing	H 1	Housing Mix
	H 2	Housing Density
	H 3	Affordable Housing
	H 4	Estate Regeneration
	H 5	Rural Exception Sites
Types of Housing	H 6	Housing for Older People
	H 7	Rural Workers' Dwellings
	H 8	Self Build and Custom Housebuilding
	H 9	Gypsies and Travellers
	H 10	Replacement dwellings outside the Limits to Built Development
	H 11	Residential extensions, alterations, outbuildings, and annexes
	H 12	Extensions to residential curtilages (domestic gardens) outside the Limits to Built Development
Employment provision	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)



Theme	Ref	Title
		uses in the countryside
	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

9.1.4 The following reasonable alternative options were applied to the Development Management (DM) Policies:

- 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.
- No Policy – where there is no reference to a particular topic or policy area in the NPPF/PPG
- Keep the existing 2006 Local Plan Policy(ies) and/or 2010 Core Strategy Policy(ies) (where applicable)
- 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.
- New Policy – application of the new development management policy as set out in the Draft Local Plan

- 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.

- 9.1.5 With regard to Policy EN13 - Ashdown Forest Special Protection Area and Special Area of Conservation, no further option is proposed because reasonable alternatives, which now form part of the new policy (i.e. the 7km zone of influence and forms of mitigation), were already 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 the relevant legal requirements have been met.
- 9.1.6 Also, in relation to Policy EN16 – Green, Blue and Grey 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.
- 9.1.7 In general, a No Policy option which relied wholly on Neighbourhood Development Plan (NDP) policies was not considered to be reasonable because not all parishes are implementing NDPs.
- 9.1.8 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.
- 9.1.9 Tables containing the scores for the policies were completed for each development management theme, followed by a discussion of the findings.

## 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 75. SA scores for EN 1 – Sustainable Design

Sustainability Objective	Option 1: No policy - rely on NPPF/PPG	Option 2: Keep existing policies in 2010 Core Strategy (CP5) and 2006 Local Plan	Option 3: New policy
Air	+	0	++
Biodiversity	0	+	++
Business Growth	+	0	-
Climate Change	0	+	++
Deprivation	0	0	0
Education	0	0	0
Employment	0	0	0
Equality	+	+	+
Health	+	+	++
Heritage	+	+	++
Housing	+	+	+
Land use	0	+	+
Landscape	++	++	+++
Noise	0	+	+
Resources	+	+	+++
Services & Facilities	+	0	++
Travel	+	0	++
Waste	0	+	++
Water	0	0	++

### Commentary

Option 3 provides more detail, clarity and guidance which will benefit and enhance the built and natural environment as well as all the environmental objectives. The only negative is for the business growth objective due to the greater expectations on developers than currently in place.

Since the Draft Local Plan Stage, this policy has been expanded to incorporate a broader range of sustainable design criteria. As such there is no longer a need for a secondary sustainable design policy that sits behind a more general design policy. This change ensures sustainable development is integral to the design process and scores reflect this.

Table 76. SA scores for EN2 – Sustainable Design Standards

<b>Sustainability Objective</b>	<b>Option 1: No policy</b>	<b>Option 2: New policy</b>
Air	0	++
Biodiversity	0	++
Business Growth	0	-
Climate Change	-	+++
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	++
Heritage	0	+
Housing	0	+
Land use	0	+
Landscape	0	++
Noise	0	+
Resources	0	++
Services & Facilities	0	+
Travel	0	++
Waste	0	++
Water	0	++

### Commentary

Option 2 provides a workable standard which will be beneficial to all environmental objectives. The only negative score assigned is for the business growth objective due to the greater expectations that would be placed on developers. There is currently no equivalent requirement in the NPPF and, of the objective topics, climate change is felt to be the furthest behind recent expectations hence is applied a negative score in Option 1.

Table 77. SA Scores for EN3 – Climate Change Mitigation and Adaptation

<b>Sustainability Objective</b>	<b>Option 1:</b> Rely and NPPF and keep existing policy (CP5) in 2010 Core Strategy	<b>Option 2:</b> New policy
Air	+	0
Biodiversity	+	+
Business Growth	0	++
Climate Change	--	+++
Deprivation	0	++
Education	0	0
Employment	0	0
Equality	+	0
Health	+	++
Heritage	+	0
Housing	0	0
Land use	+	+
Landscape	+	++
Noise	+	0
Resources	+	0
Services & Facilities	0	0
Travel	0	0
Waste	+	0
Water	+	++

### Commentary

Option 2 provides a proactive and detailed approach which will be beneficial to climate change objectives and have numerous co-benefits for other environmental objectives. Existing Policy CP5 in the 2010 Core Strategy briefly covers a wider range of environmental and social issues. However, a focus on climate change is lacking. Also, Option 2 was felt to provide greater benefits than the current NPPF can provide alone.

Business objective scores positively to reflect the focus on the rural economy and benefit to businesses of climate change adaptation.

Since the Draft Local Plan Stage, this policy has been expanded to incorporate a broader range of sustainable design criteria. As such there is no longer a need for a secondary sustainable design policy that sits behind a more general design policy. This change ensures sustainable development is integral to the design process and scores reflect this.

Table 78. SA scores for EN4 – Historic Environment

<b>Sustainability Objective</b>	<b>Option 1: No policy - rely on NPPF/PPG</b>	<b>Option 2: New policy</b>
Air	0	0
Biodiversity	0	0
Business Growth	0	+
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	-	+
Heritage	--	+++
Housing	0	0
Land use	0	0
Landscape	--	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	+
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and detailed approach which will be beneficial to heritage, landscape, business, health and services objectives.

Table 79. SA scores for EN5 – Heritage Assets

<b>Sustainability Objective</b>	<b>Option 1: No policy - rely on NPPF/PPG</b>	<b>Option 2: New policy</b>
Air	0	0
Biodiversity	0	0
Business Growth	0	+
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	-	+
Heritage	++	+++
Housing	0	0
Land use	0	0
Landscape	++	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	++
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and detailed approach for each of the heritage assets which will be beneficial to heritage, landscape, business, health and services objectives.

Since Draft Local Plan stage, the policy wording has been strengthened to further benefit the historic environment. However, this cannot be reflected in the Option 2 score for heritage as this objective had already been assigned the maximum positive score.

Table 80. SA scores for EN6 – Shop Fronts

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing policy (EN6) in 2006 Local Plan	<b>Option 2:</b> New policy
Air	0	0
Biodiversity	0	0
Business Growth	+	+
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	+	++
Housing	0	0
Land use	0	0
Landscape	+	+
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides more detail, clarity and guidance which will particularly benefit the heritage objective.



Table 81. SA scores for EN7 – Advertisements

<b>Sustainability Objective</b>	<b>Option 1: No policy - rely on NPPF/PPG</b>	<b>Option 2: New policy</b>
Air	0	0
Biodiversity	0	0
Business Growth	?	+
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	--	++ / +++
Housing	0	0
Land use	0	0
Landscape	--	++ / +++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides more detail, clarity and guidance which will benefit the heritage, landscape and business objectives.

Since Draft Local Plan stage, the policy wording has been strengthened to further benefit the landscape objective. This has been reflected in the Option 2 score.

Table 82. SA scores for EN8 – Outdoor Lighting &amp; Dark Skies

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing policy (EN8) in 2006 Local Plan	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	-	++
Business Growth	0	0
Climate Change	0	+
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	+	++
Housing	0	0
Land use	0	0
Landscape	+	++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides more detailed guidance which will be beneficial to meeting the biodiversity, climate change, heritage and landscape objectives.

9.2.2 In summary, the Environment and Design preferred policies have almost entirely neutral or positive scores, with positive scores especially in relation to biodiversity, heritage and landscape objectives.

## Natural Environment

Table 83. SA scores for EN 9 – Net Gains for Nature: biodiversity and geodiversity

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2010 Core Policy CP4	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	++	+++
Business Growth	0	0
Climate Change	+	+
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	+
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	++	++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	++

### Commentary

Option 2 provides more detail, clarity and guidance which will benefit and enhance the biodiversity, climate change, health and landscape and water objectives.

Since Draft Local Plan stage, the policy wording has been strengthened to further benefit the biodiversity objective making use of a robust metric compulsory. However, this cannot be reflected in the Option 2 score for biodiversity as this objective had already been assigned the maximum positive score.

Table 84. SA Scores for EN 10 – Protection of Designated Sites and Habitats

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 Local Policy EN 15 & 2010 Core Strategy Policy CP 4	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	++	+++
Business Growth	0	0
Climate Change	+	+
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	+++
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	+	++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	+	++

### Commentary

Option 2 provides detail, clarity, guidance and a hierarchal approach which will benefit and enhance the biodiversity, climate change, health, landscape and water objectives.

Since Draft Local Plan stage, the policy wording has been strengthened to further benefit the biodiversity objective ensuring protection is given greater emphasis. However, this cannot be reflected in the Option 2 score for biodiversity as this objective had already been assigned the maximum positive score.

Table 85. SA scores for Policy EN 11 – Ashdown Forest SPA and SAC

<b>Sustainability Objective</b>	<b>New Policy</b>
Air	0
Biodiversity	+++
Business Growth	0
Climate Change	++
Deprivation	0
Education	0
Employment	0
Equality	0
Health	0
Heritage	0
Housing	0
Land use	0
Landscape	++
Noise	0
Resources	0
Services & Facilities	0
Travel	0
Waste	0
Water	0

### **Commentary**

The new policy wording was devised working in partnership with other affected LPAs (within a strategic zone of influence affecting the SPA & SAC). 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.

See paragraph 9.1.5 for an explanation of why no reasonable alternative was tested in comparison to this new policy.

Table 86. SA Scores for Policy EN 12 – Trees, Woodland, Hedges and Development

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 Local Plan Policy EN13	<b>Option 2:</b> New Policy
Air	0	+
Biodiversity	0	++
Business Growth	0	0
Climate Change	0	+
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	+
Heritage	0	+
Housing	0	0
Land use	0	0
Landscape	++	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	+

### Commentary

Option 2 provides more detail, clarity and guidance which will benefit many environmental objectives.

Table 87. SA scores for Policy EN 13 – Ancient Woodland and Veteran Trees

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy</b>
Air	0	+
Biodiversity	0	++
Business Growth	0	0
Climate Change	0	+
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	+
Heritage	-	+++
Housing	0	0
Land use	0	0
Landscape	--	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	+

### Commentary

Option 2 provides detail, clarity and guidance which will benefit many of the environmental objectives.

Table 88. SA scores for Policy EN 14 – Green, Grey and Blue Infrastructure

<b>Sustainability Objective</b>	<b>New Policy</b>
Air	+
Biodiversity	++
Business Growth	0
Climate Change	++
Deprivation	0
Education	0
Employment	0
Equality	0
Health	+
Heritage	0
Housing	0
Land use	0
Landscape	++
Noise	0
Resources	0
Services & Facilities	0
Travel	+
Waste	0
Water	++

### **Commentary**

This option provides detail, clarity and guidance which will benefit many environmental objectives. The transport objective also benefits from the expectation for green routes specifically designed for walking a cycling.

See paragraph 9.1.6 for an explanation of why no reasonable alternative was tested in comparison to this new policy.



Table 89. SA scores for Policy EN 15 – Local Green Space

<b>Sustainability Objective</b>	<b>Option 1:</b> No policy – defer to NDPs	<b>Option 2:</b> New policy
Air	0	0
Biodiversity	?	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	?	+
Heritage	?	++
Housing	0	0
Land use	?	++
Landscape	?	++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides detail, clarity and guidance which will benefit the biodiversity, health, heritage, land use and landscape.

Table 90. SA scores for Policy EN 16 – Landscape within the Built Environment

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy – amended version from 2006 Local Plan</b>
Air	0	+
Biodiversity	-	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	-	+
Heritage	-	+
Housing	0	0
Land use	0	0
Landscape	--	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	-	+

### Commentary

Option 2 provides detail, clarity and guidance which will benefit the air, biodiversity, health, heritage, landscape and water objectives.

Table 91. SA scores for EN 17 – Acadian Areas

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy – amended version from 2006 Local Plan</b>
Air	0	0
Biodiversity	-	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	--	+++
Housing	0	0
Land use	0	0
Landscape	--	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides detail, clarity and guidance which will benefit the biodiversity, heritage and landscape objectives.

Table 92. SA scores for EN 18 – Rural Landscape

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy - rely on Section 15 of NPPF only	<b>Option 2:</b> New Policy – amended version from 2006 Local Plan
Air	0	0
Biodiversity	+	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	-	++
Housing	0	0
Land use	0	0
Landscape	++	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides detail, clarity and guidance which will benefit the biodiversity, heritage and landscape objectives.

Table 93. SA scores for EN 19 – High Weald AONB

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy - rely on Section 15 of NPPF only	<b>Option 2:</b> New Policy – amended version from 2006 Local Plan
Air	0	0
Biodiversity	+	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	-	++
Housing	0	0
Land use	0	0
Landscape	++	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	+

### Commentary

Option 2 provides detail, clarity and guidance, relating to specific components of the AONB, which will benefit the biodiversity, heritage, landscape and water objectives.

Table 94. SA scores for EN 20 – Agricultural Land

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy - rely on Section 15 of the NPPF advice only	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	++	+++
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	++	+++
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides more clarity on grades of land and other factors relating to quality which is more beneficial to the natural environment objectives of biodiversity and land use.

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 95. SA scores for Policy EN 21 – Air Quality

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep relevant part of existing Policy CP5 in 2010 Core Strategy	<b>Option 2:</b> New Policy
Air	++	+++
Biodiversity	0	++
Business Growth	0	0
Climate Change	++	+++
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	+
Resources	0	0
Services & Facilities	0	0
Travel	0	++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and detailed approach which will be beneficial to the air, biodiversity, climate change, noise and travel objectives. Note: health benefits are considered by the air quality objective.

Table 96. SA scores for Policy EN 22 – AQMAs

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep relevant part of existing Policy CP5 in 2010 Core Strategy	<b>Option 2:</b> New Policy
Air	++	+++
Biodiversity	0	+
Business Growth	0	0
Climate Change	++	++
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	+
Resources	0	0
Services & Facilities	0	0
Travel	0	+
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and detailed approach which will be beneficial to the air, biodiversity, climate change, noise and travel objectives.

Note: health benefits are considered by the air quality objective.



Table 97. SA scores for Policy EN 23 – Biomass Technology

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy</b>
Air	--	+++
Biodiversity	0	+
Business Growth	0	0
Climate Change	--	++
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	+
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a proactive approach which will be beneficial to air, biodiversity, climate change and resources objectives

Note: health benefits are considered by the air quality objective.

Table 98. SA scores for EN 24 – Water Supply, Quality, and Conservation

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep relevant part of existing Policy CP5 in 2010 Core Strategy and 2006 Local Plan Policies EN16	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	+	++
Business Growth	0	0
Climate Change	+	++
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	+
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	++	+++

### Commentary

Option 2 provides a more proactive and detailed approach which will be beneficial to the biodiversity, climate change, landscape and water objectives.

Since the Draft Local Plan Stage, this policy has been expanded to incorporate more detail on water resource conservation. As such there is no longer a need for a secondary water conservation policy.

Table 99. SA scores for EN 25 – Flood Risk

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep relevant part of existing Policy CP5 in 2010 Core Strategy and 2006 Local Plan Policy EN18	<b>Option 2:</b> New Policy
Air	+	0
Biodiversity	+	+
Business Growth	0	0
Climate Change	++	++
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	+
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	++	+++

### Commentary

Option 2 provides a more detailed and proactive approach at local level which will be beneficial to the water and climate change objectives.

Table 100. SA scores for EN 26 – Sustainable Drainage

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy - rely on NPPF/NPPG only	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	+	++
Business Growth	0	0
Climate Change	++	++
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	+++	+++

### Commentary

Option 2 provides a more detailed and proactive approach at local level which will be beneficial to biodiversity, climate change, landscape and water objectives.

Table 101. SA scores for EN 27 – Noise

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep relevant part of existing Policy CP5 in 2010 Core Strategy	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	++	++
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	+
Noise	++	+++
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides more detail, clarity and guidance which will benefit the health, landscape and noise objectives.

Table 102. SA scores for EN 28 – Land Contamination

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep relevant part of existing Policy CP5 in 2010 Core Strategy	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	+	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	+	+
Heritage	0	0
Housing	0	0
Land use	+	+
Landscape	+	+
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	+	+

### Commentary

The scoring is the same, but Option 2 provides more detail, clarity and guidance which will benefit the biodiversity, health, housing, landscape 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 103. SA scores for H1 – Housing Mix

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing Policy H2 in 2006 Local Plan and 2010 Core Strategy Policy CP 6	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	0	0
Business Growth	0	+
Climate Change	0	0
Deprivation	+	+
Education	0	0
Employment	0	0
Equality	+	+
Health	+	+
Heritage	0	0
Housing	+++	+++
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	0	+
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a less prescriptive approach which will address the needs of a particular settlement or area and particularly benefit the housing objective.

Table 104. SA scores for Policy H 2 – Housing Density

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy - Rely on Section 11 of NPPF only	<b>Option 2:</b> Keep existing Policy in 2010 Core Strategy (CP6)	<b>Option 3:</b> New Policy
Air	0	0	0
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	+	0	0
Education	0	0	0
Employment	0	0	0
Equality	+	0	+
Health	+	0	0
Heritage	0	0	0
Housing	++	+	+++
Land use	0	0	+
Landscape	++	+	+++
Noise	0	0	0
Resources	0	0	0
Services & Facilities	++	0	++
Travel	++	0	++
Waste	0	0	0
Water	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 equality, housing, land use, landscape services and travel objectives.



Table 105. SA scores for Policy H 3 – Affordable Housing

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy - Rely on Section 5 of NPPF only (at least 10% affordable home ownership)	<b>Option 2:</b> Keep existing Policy in 2010 Core Strategy CP6 - retain existing threshold of 35% for 10 dwellings +	<b>Option 3:</b> New Policy with 2 different thresholds - greenfield (35%)/brownfield thresholds (40%) and off site contributions for 1 to 9 dwellings
Air	0	0	0
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	+	++	++
Education	0	0	0
Employment	0	0	0
Equality	0	0	0
Health	0	0	+
Heritage	0	0	0
Housing	+	++	+++
Land use	+	0	0
Landscape	0	0	+
Noise	0	0	0
Resources	0	0	0
Services & Facilities	0	+	+
Travel	0	+	+
Waste	0	0	0
Water	0	0	0

### Commentary

Option 3 provides a locally applicable approach for both greenfield and brownfield sites which will bring particular benefits to the deprivation, housing and landscape objectives.

Table 106. SA scores for Policy H 4 – Estate Regeneration

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy</b>
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	0
Deprivation	--	++
Education	0	0
Employment	0	0
Equality	0	0
Health	0	+
Heritage	0	0
Housing	--	++
Land use	-	++
Landscape	-	++
Noise	0	0
Resources	-	-
Services & Facilities	0	+
Travel	0	+
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a proactive and detailed approach which will particularly benefit the deprivation, housing, land use and landscape objectives.

Table 107. SA scores for Policy H 5 – Rural Exception Sites

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy rely on Section 5 of NPPF only	<b>Option 2:</b> Keep existing Policies (H8) in 2006 Local Plan and 2010 Core Strategy	<b>Option 3:</b> New Policy
Air	+	0	0
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	+	+	+
Education	0	0	0
Employment	0	0	0
Equality	0	+	+
Health	0	+	0
Heritage	0	0	0
Housing	++	+++	+++
Land use	0	+	0
Landscape	0	++	+++
Noise	0	0	0
Resources	0	0	0
Services & Facilities	++	++	++
Travel	++	++	++
Waste	0	0	0
Water	0	0	0

### Commentary

There is similar scoring across Options 2 and 3 but Option 3 provides a more detailed and locally applicable approach which will particularly benefit the housing delivery, landscape, services and travel objectives

Table 108. SA scores for H 6 (part 1 of 2) – Housing for Older People (Meeting Need)

<b>Sustainability Objective</b>	<b>Option 1:</b> Criteria based policy (as per new Policy)	<b>Option 2:</b> Site allocations only
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	0
Deprivation	+	+
Education	0	0
Employment	0	0
Equality	++	0
Health	+	?
Heritage	0	0
Housing	+++	+++
Land use	0	0
Landscape	+++	?
Noise	+	?
Resources	+	0
Services & Facilities	++	+
Travel	+	?
Waste	0	0
Water	0	0

### Commentary

Option 1 provides a more flexible approach which will benefit housing delivery (for a specific group), alongside the equality, landscape and services 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.

Table 109. SA scores for H 6 (part 2 of 2) – Housing for Older People (Accessibility)

<b>Sustainability Objective</b>	<b>Option 1:</b> Meet Building Reg Part 4 M(2) standards - affordable homes only	<b>Option 2:</b> Meet Building Reg Part 4 M(2) standards - all homes
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	0
Deprivation	+	+
Education	0	0
Employment	0	0
Equality	++	+++
Health	+	+
Heritage	0	0
Housing	++	+++
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a wider approach which will benefit the housing delivery objective for this particular group/housing type (subject to viability assessment).

Table 110. SA scores for H 7 – Rural Workers' Dwellings

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy - rely on para 79 of NPPF only	<b>Option 2:</b> Revised Rural Workers' Dwellings Policy (amendment to Policy in 2006 Local Plan)
Air	0	0
Biodiversity	0	0
Business Growth	-	+
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	-	+
Equality	0	0
Health	0	0
Heritage	0	0
Housing	--	++
Land use	0	0
Landscape	---	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a detailed approach which will benefit housing delivery (for a specific group) and the landscape objective in particular.

Table 111. SA scores for H 8 – Self Build and Custom Housebuilding

<b>Sustainability Objective</b>	<b>Option 1:</b> Focus on small/windfall sites (up to 10 dwellings)	<b>Option 2:</b> Alternative policy with 5% provision for 20+ units	<b>Option 3:</b> Alternative policy with 5% provision for 100+ units	<b>Option 4:</b> New policy with combined focus on windfalls and specific site allocations
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	0	0	0
Equality	0	0	0	0
Health	0	0	0	0
Heritage	0	0	0	0
Housing	++	++	++	++
Land use	?	?	0	0
Landscape	?	?	0 / +	+
Noise	0	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

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 but, based on current requirements, is likely to create a surplus of self/custom build plots and thus benefits are negated somewhat. 2020 evidence now suggests that it will be possible to deliver the majority of the self/custom build development needs delivered through windfall sites which will provide greater distribution across the borough than other options. However, some specific allocations will be required in areas with high needs. The scores for Option 4 reflect this balance.

Table 112. SA scores for Policy H9 – Gypsies and Travellers

<b>Sustainability Objective</b>	<b>Option 1:</b> Focus on intensification/extension of existing sites	<b>Option 2:</b> Focus on new allocations
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	++	++
Land use	+	0 / -
Landscape	++	0 / -
Noise	+	+
Resources	0	0
Services & Facilities	0	0
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 1 provides a workable and detailed approach which will benefit housing delivery (for a specific group and family needs) and landscape and noise objectives while Option 2 could be hindered by the landscape or land use objectives and result in less preferred locations in terms of meeting specific family needs.

Gypsy and Traveller needs in the borough are minimal and can mostly be accommodated on existing pitches by adding between 1 and 3 additional pitches. Significant impacts are not predicted from expanding existing pitches. The Pre Submission Local Plan makes one proposal for a new gypsy and traveller site at Greenfields Farm (site DCP\_15) which could potentially accommodate 3 additional pitches. The SA scores for this new site are considered in Chapter 8.



Table 113. SA scores for Policy H 10 – Replacement Dwellings Outside the LBD

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: Revised Replacement Dwellings Policy (amendment to Policy H10 in 2006 Local Plan)</b>
Air	0	0
Biodiversity	0	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	-	++
Housing	0	+
Land use	0	+
Landscape	--	+++
Noise	0	0
Resources	--	++
Services & Facilities	0	0
Travel	0	0
Waste	-	+
Water	0	0

### Commentary

Option 2 provides a directive approach as well as detailed guidance which will particularly benefit landscape, heritage and resources objectives.

Table 114. SA scores for Policy H 11 – Residential Extensions, alterations etc.

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy (amendment to Policy H11 in 2006 Local Plan)</b>
Air	0	0
Biodiversity	-	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	-	+
Housing	0	0
Land use	0	0
Landscape	--	+++
Noise	0	0
Resources	-	+
Services & Facilities	0	0
Travel	0	0
Waste	0	+
Water	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.

Table 115. SA scores for Policy H 12 – Extensions to Curtilages outside the LBD

Sustainability Objective	Option 1: No Policy	Option 2: New Policy
Air	0	0
Biodiversity	-	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	+
Housing	0	0
Land use	-	+
Landscape	--	+++
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	0	+
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a prescriptive 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 – H5) 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 (H6 – H12) 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 116. SA scores for Policy ED 1 – Key Employment Areas

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing Policies (ED1, ED2, ED3) in 2006 Local Plan and 2010 Core Strategy CP7	<b>Option 2:</b> New Policy
Air	+	+
Biodiversity	0	0
Business Growth	++	+++
Climate Change	+	+
Deprivation	0	0
Education	0	0
Employment	+++	+++
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	++	+
Landscape	0	0
Noise	+	0
Resources	+	+
Services & Facilities	+	+++
Travel	++	++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides more detail, clarity and guidance which will particularly benefit the business and service objectives.

Table 117. SA scores for Policy ED 2 – Retention of Existing Employment Sites and Buildings

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy</b>
Air	0	0
Biodiversity	0	0
Business Growth	--	+++
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	--	+++
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	++
Landscape	0	0
Noise	0	0
Resources	0	+
Services & Facilities	-	+
Travel	0	0
Waste	0	0
Water	0	0

### Commentary

Option 2 provides detail, clarity and guidance which will have relatively large benefit for the business growth, employment, land use, resources and services objectives when compared with Option 1.

Table 118. SA scores for Policy ED3 – Digital Communications and FTTP

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing Policy (EN20) in 2006 Local Plan	<b>Option 2:</b> New Policy
Air	0	+
Biodiversity	0	0
Business Growth	+++	++
Climate Change	0	+
Deprivation	0	0
Education	0	0
Employment	+	++
Equality	0	0
Health	++	+++
Heritage	0	0
Housing	0	0
Land use	0	+
Landscape	++	++
Noise	0	0
Resources	0	0
Services & Facilities	0	++
Travel	0	++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides more detail, clarity and guidance which will benefit to many environmental objectives. For example, improvement of the digital communications network will facilitate home working and help reduce the need to travel which will benefit air quality and climate change.

Table 119. SA scores for Policy ED 4 – Rural Diversification

<b>Sustainability Objective</b>	<b>Option 1: No policy - rely on NPPF only</b>	<b>Option 2: New policy</b>
Air	+	+
Biodiversity	0	0
Business Growth	+++	+++
Climate Change	+	+
Deprivation	0	0
Education	0	0
Employment	+++	+++
Equality	0	0
Health	0	0
Heritage	+	+++
Housing	0	0
Land use	+	++
Landscape	++	+++
Noise	0	0
Resources	+	++
Services & Facilities	+++	+++
Travel	++	++
Waste	0	+
Water	0	0

### Commentary

Option 2 provides more detail, clarity and guidance which will benefit several objectives especially heritage, land use, landscape, resources and waste.

Table 120. SA scores for ED 5 – Conversion of Rural Buildings Outside the LBD

<b>Sustainability Objective</b>	<b>Option 1:</b> No policy - rely on NPPF advice only	<b>Option 2:</b> Keep existing policies (H13 and ED5) in 2006 Local Plan	<b>Option 3:</b> New policy
Air	0	0	0
Biodiversity	0	0	+
Business Growth	++	++	+++
Climate Change	+	0	0
Deprivation	0	0	0
Education	0	0	0
Employment	++	+	++
Equality	0	0	0
Health	0	0	+
Heritage	+	++	+
Housing	0	0	0
Land use	+	++	+++
Landscape	+	+++	+++
Noise	0	0	0
Resources	+	+	++
Services & Facilities	+	0	+
Travel	+	0	0
Waste	0	0	+
Water	0	0	+

### Commentary

Option 3 provides more detail, clarity and guidance which will particularly benefit the biodiversity, business growth, health, land use, resources, waste and water objectives.



Table 121. SA scores for ED 6 – Commercial etc. Uses in the Countryside

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy</b>
Air	0	0
Biodiversity	0	+
Business Growth	-	+++
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	-	++
Equality	0	0
Health	-	+
Heritage	0	+
Housing	0	0
Land use	-	+++
Landscape	-	+++
Noise	0	0
Resources	-	++
Services & Facilities	-	+
Travel	0	0
Waste	0	+
Water	0	+

### Commentary

Option 2 provides a proactive and detailed approach which will be beneficial to economic, landscape, heritage and biodiversity objectives.

Since Draft Local Plan stage, this policy has been updated to provide greater protection to the existing landscape. However, the maximum score has already been applied for this objective and so scores remain unchanged.

Table 122. SA scores for ED 7 – Retention and promotion of Tourist Accommodation &amp; Attractions

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing policies (T1-T3) in 2006 Local Plan and 2010 Core Strategy CP7	<b>Option 2:</b> New policy
Air	0	+
Biodiversity	0	0
Business Growth	++	++
Climate Change	0	+
Deprivation	0	0
Education	0	0
Employment	+	++
Equality	0	0
Health	0	0
Heritage	+	+
Housing	0	0
Land use	0	+
Landscape	+	++
Noise	0	0
Resources	0	0
Services & Facilities	+++	+++
Travel	+	++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and detailed approach which will be beneficial to air, climate change, employment, landscape and travel objectives.

Since Draft Local Plan stage, this policy has been updated to refer to the Green Belt. As such, the land use objective score has been improved.

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 123. SA scores for Policy ED 8 – Centres Hierarchy

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 TW Local Plan Policies (CR1 – CR3) and 2010 Core Strategy Policy CP8	<b>Option 2:</b> New Policy
Air	0	+
Biodiversity	0	0
Business Growth	++	+++
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	+	++
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	++	+++
Travel	+	++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and constructive approach which will be particularly beneficial to the business growth, employment, services and travel objectives.

Table 124. SA scores for Policy ED 9 – Towns and Rural Service Centres

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 TW Local Plan Policies (CR5, CR7, CR9, CR10, CR12) and 2010 Core Strategy Policy CP8	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	0	0
Business Growth	++	+++
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	++	++
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	+
Resources	0	0
Services & Facilities	++	+++
Travel	+	+
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and constructive approach which will be beneficial to the business growth, employment and services objectives.

Table 125. SA scores for Policy ED 10 – Sequential Test and Local Impact Test

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 TW Local Plan Policies (CR1-CR3) and 2010 Core Strategy Policy CP8	<b>Option 2:</b> New Policy
Air	0 / +	+
Biodiversity	0	0
Business Growth	++	++
Climate Change	0	+
Deprivation	0	0
Education	0	0
Employment	++	+
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	+++	+++
Travel	+	++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and constructive approach which will be particularly beneficial to the air, climate change and travel objectives.

Table 126. SA scores for Policy ED 11 – Primary Shopping Areas and Retail Frontages

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 TW Local Plan Policies (CR5, CR7, CR9, CR10, CR12) and 2010 Core Strategy Policy CP8	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	0	0
Business Growth	++	+++
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	+	+
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	+++	+++
Travel	+	+
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a less prescriptive, more flexible approach which will be particularly beneficial to the business growth objective.

Table 127. SA scores for Policy ED 12 – Retention of Local Services and Facilities

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 TW Local Plan Policies (CS6 , CR13) and 2010 Core Strategy Policy CP8	<b>Option 2:</b> New Policy
Air	+	+
Biodiversity	0	0
Business Growth	+	+
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	+	+
Equality	+	+
Health	+	+
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	+++	+++
Travel	+	++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides more detail and guidance which will particularly benefit the 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 128. SA scores for TP 1 – Transport Assessments, Travel Plans &amp; Mitigation

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 TW Local Plan Policies (TP1 and TP2) and 2010 Core Strategy Policy CP3	<b>Option 2:</b> New Policy for Draft Local Plan	<b>Option 3:</b> Pre- Submission Local Plan New Policy
Air	++	++	+++
Biodiversity	0	0	0
Business Growth	+	++	++
Climate Change	+	+	++
Deprivation	0	0	0
Education	0	0	0
Employment	+	+	+
Equality	+	+	+
Health	++	++	++
Heritage	0	0	0
Housing	0	0	0
Land use	0	0	0
Landscape	0	0	0
Noise	++	++	++
Resources	0	0	0
Services & Facilities	++	++	++
Travel	+++	+++	+++
Waste	0	0	0
Water	0	0	0

### Commentary

Option 3 provides more detail, clarity and guidance which will be particularly beneficial to the air, business, health, noise, services and travel objectives.

Removal of the thresholds for requiring travel plans from the Pre-Submission Local Plan policy gives more flexibility and ensures all relevant developments would be subject to preparation of a travel plan. This brings further benefits to the air, climate change and travel objectives (although the travel objective had already been assigned the maximum score so this cannot be demonstrated).



Table 129. SA scores for TP 2 – Transport Design and Accessibility

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing 2006 TW Local Plan Policies (TP3) and 2010 Core Strategy Policy CP3	<b>Option 2:</b> New Policy
Air	+	+
Biodiversity	0	0
Business Growth	+	+
Climate Change	+	+
Deprivation	0	0
Education	0	0
Employment	+	+
Equality	+	++
Health	++	++
Heritage	0	++
Housing	0	0
Land use	0	0
Landscape	+	+++
Noise	++	++
Resources	0	0
Services & Facilities	++	++
Travel	+++	+++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more proactive and detailed approach which will be particularly beneficial to the landscape and travel objectives.

Table 130. SA scores for Policy TP 3 – Parking Standards

<b>Sustainability Objective</b>	<b>Option 1:</b> No Policy - rely on Section 9 of NPPF advice only	<b>Option 2:</b> Keep existing 2006 TW Local Plan Policy (policies TP5 - TP9)	<b>Option 3:</b> New Policy for Draft Local Plan	<b>Option 4:</b> Pre-Submission Local Plan New Policy
Air	+	+	+	++
Biodiversity	0	0	0	0
Business Growth	+	+	+	+
Climate Change	+	+	+	+
Deprivation	0	0	0	0
Education	0	0	0	0
Employment	+	+	+	+
Equality	+	0	0	0
Health	+	+	+	+
Heritage	0	++	+	+
Housing	0	0	0	0
Land use	0	0	0	0
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

The scoring for Options 2, 3 and 4 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 particularly beneficial to travel and landscape objectives.

There are elements of the Pre-submission Local Plan Policy that are an improvement upon the Draft Local Plan Policy e.g. the provision of exceptions to the mandatory parking spaces. This amendment will have benefits to the air, climate change and travel objectives. However, this is not reflected in the travel score because the maximum positive score has already been applied.

Table 131. SA scores for Policy TP 4 – Public Car Parks

<b>Sustainability Objective</b>	<b>Option 1: No Policy</b>	<b>Option 2: New Policy</b>
Air	0	+
Biodiversity	0	0
Business Growth	-	++
Climate Change	0	+
Deprivation	0	0
Education	0	0
Employment	-	+
Equality	0	0
Health	0	+
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	-	++
Travel	-	++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides clarity and guidance which will be particularly beneficial to the business, services and travel objectives.

Table 132. SA scores for Policy TP 5 – Railways

<b>Sustainability Objective</b>	<b>Option 1:</b> Keep existing Policy in 2010 Core Strategy (policy CP3)	<b>Option 2:</b> New Policy
Air	+	++
Biodiversity	0	0
Business Growth	+	+
Climate Change	+	+
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	+
Heritage	0	++
Housing	0	0
Land use	0	0
Landscape	0	+
Noise	0	0
Resources	0	0
Services & Facilities	+	++
Travel	++	+++
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a proactive and detailed approach which will be particularly beneficial to the air, heritage (former Hop Pickers line), travel and services objectives.

Table 133. SA scores for TP 6 – Safeguarding Roads (A228 Strategic Link).

<b>Sustainability Objective</b>	<b>Option 1: No safeguarding</b>	<b>Option 2: New Policy</b>
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	?
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	-	++
Waste	0	0
Water	0	0

### Commentary

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 objective. The climate change score is mixed score to reflect the fact that easing of congestion will reduce idling but also encourage faster speeds

Table 134. SA scores for TP 6 – Safeguarding Roads (A21 Kippings Cross/ Lamberhurst).

<b>Sustainability Objective</b>	<b>Option 1: No safeguarding</b>	<b>Option 2: New Policy</b>
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	?
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	0	0
Health	0	0
Heritage	0	0
Housing	0	0
Land use	0	0
Landscape	0	0
Noise	0	0
Resources	0	0
Services & Facilities	0	0
Travel	-	++
Waste	0	0
Water	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 objective. The climate change score is mixed score to reflect the fact that easing of congestion will reduce idling but also encourage faster speeds

See paragraph 8.1.8 for an explanation of how scores were determined for this policy.

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 in detail, as there is no commitment to a scheme.

## Open Space, Sport and Recreation

Table 135. SA scores for Policy OSSR1 – Retention of Open Space

<b>Sustainability Objective</b>	<b>Option 1:</b> Use existing Policy (R1) in 2006 Local Plan and 2010 Core Strategy Policy CP8	<b>Option 2:</b> New Policy
Air	0	+
Biodiversity	0	+
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0	0
Employment	0	0
Equality	+	+
Health	+++	+++
Heritage	0	0
Housing	0	0
Land use	+	+
Landscape	++	++
Noise	0	0
Resources	0	0
Services & Facilities	++	++
Travel	+	+
Waste	0	0
Water	0	0

### Commentary

Option 2 provides a more directive and detailed approach which will particularly benefit the air and biodiversity objectives.

Table 136. SA scores for Policy OSSR 2 – Provision of Publicly Accessible Open Space and Recreation

<b>Sustainability Objective</b>	<b>Option 1:</b> Use existing Policy (R2) in 2006 Local Plan and 2010 Core Strategy Policy CP8	<b>Option 2:</b> New Policy
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	0
Deprivation	+	+
Education	0	0
Employment	0	0
Equality	++	+++
Health	+++	+++
Heritage	0	0
Housing	0	0
Land use	+	+
Landscape	++	+++
Noise	0	+
Resources	0	0
Services & Facilities	++	+++
Travel	++	+++
Waste	0	0
Water	0	0

### Commentary

Although the scoring is similar for Options 1 and 2, Option 2 provides a more prescriptive and detailed approach which will particularly benefit the equality, landscape, noise services 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 Monitoring

### 10.1 Need for Monitoring

10.1.1 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.

10.1.2 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.

### 10.2 Proposed Measures for Monitoring

10.2.1 Table 137 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 137. 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

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Biodiversity	2. Protect and enhance biodiversity and the natural environment	<p>Number of developments generating adverse effects on sites recognised for biodiversity value (including local sites as well as Sites of Special Scientific Interest (SSSIs))</p> <p>Number of developments generating biodiversity enhancement including GI</p> <p>Deterioration in condition of SSSIs.</p> <p>Reduction in percentage cover of sites designated for nature conservation</p> <p>Biodiversity units lost or gained as a result of major development</p>	TWBC/ Natural England/TWBC/ KMBRC
Business Growth	3. Encourage business growth and competitiveness	Floor space targets for new Local Plan.	TWBC
Climate Change & Energy	4. Reduce carbon footprint and adapt to predicted changes	<p>Attainment of carbon reduction targets</p> <p>Grading of Energy Performance Certificates.</p> <p>Number of EV car registrations.</p> <p>Number of renewable energy schemes.</p>	TWBC/KCC
Deprivation	5. Reduce poverty and assist with regeneration	3 yearly Indices of Multiple Deprivation (IMD) Report.	KCC Research and Intelligence Monthly Bulletin (deprivation and poverty)
Education	6. Improve educational attainment and enhance the skills base	Ratio of applicants to school places.	KCC Education Department

SA Topic	SA Objective	Possible Monitoring Indicator	Source
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.  Number of Listed Buildings 'At Risk'.	TWBC
Housing	11.Provide sufficient housing to meet identified needs	5 year Housing Land Supply Housing Delivery Test	TWBC
Land use	12.Protect soils, and reuse previously developed land and buildings	MGB Allocation Summary  Brownfield register	TWBC
Landscape	13.Protect and enhance landscape and townscape	Majors permitted per year in the AONB.  Monitoring of the AONB Management Plan.	TWBC
Noise	14.Reduce noise pollution	Tranquillity maps  Noise maps	CPRE DEFRA
Resources	15.Reduce the impact of resource consumption	% of relevant applications where demolition is avoided  % of relevant applications where materials are sourced responsibly  Safeguarding of mineral and waste assets	TWBC/KCC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
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. Water Use calculations	EA/TWBC

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

10.2.3 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

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

## 11 Appendices

## Appendix A – Baseline Review

### Social Indicators Analysis

Table 138. Analysis of social baseline indicators and implication for new Local Plan

Indicator	Trend/Key Finding	Target	Implication
16-18 Not in Education, Employment or Training (NEET)	<p><b>TW KENT RANK</b></p> <p>2018 2.16 % 3.02% 6<sup>th</sup> lowest in Kent</p> <p>Number of NEET is close to Kent average and well below target.</p> <p>Source: KCC (2018) Young People Not in Education, Employment or Training</p>	TWBC 1.65 % Kent 2.5%	Where possible, this issue needs some attention in the new Local Plan.
Access for disabled people	<p>There are 62 identified community places within TWB. Of these:</p> <ul style="list-style-type: none"> <li>• 0% have level access and automatic doors</li> <li>• 58% have access via ramps, slopes or manual doors</li> <li>• 61% cater for mobility impaired walkers</li> <li>• 65% have seats available</li> <li>• 40% have accessible toilets</li> <li>• 48% have standard toilets</li> <li>• 2% have accessible changing rooms</li> <li>• 6% have large print</li> <li>• 2% have braille</li> <li>• 18% have a hearing system</li> <li>• 47% have *** parking standards</li> <li>• 2% have ** parking standards</li> <li>• 11% have * parking standards</li> </ul> <p>Not doing as well as could be in the borough. The SHMA indicates that the growing older population will create a demand for wheelchair accessible homes.</p> <p>Sources: AccessAble (2020) <a href="#">Tunbridge Wells Accessibility Guide</a> HousingLIN (2020) <a href="#">SHOP Toolkit</a> Tunbridge Wells Borough Council (2017) <a href="#">Strategic Housing Market Assessment</a></p>	<p>Equality Act (2011) places a duty upon public authorities to consider all individuals when carrying out their day to day work including shaping policy.</p> <p>SHOP@ (Strategic Housing for Older People Analysis Tool) advises that the number of units required per 1,000 of the population over 75 years old for extra care is 25 or 2.5%.</p> <p>Based on 2018 ONS population projections of the increase in residents over 75 years of age, this would equate to some 431 extra care home dwellings in the borough by 2038</p>	<p>Accessible community places are limited in the borough. Improvements must be made to existing places.</p> <p>Adopt a policy that enforces the additional technical housing standard for accessibility and wheelchairs.</p>
Access to recreation and green open space	<p>TWB Open Space Study presented the existing shortfalls in amenity green space and youth play space. On-site provision of these types of open space as part of new development is to be a priority of the Local Plan.</p> <p>Improvements to existing open space will first be considered.</p> <p>It is important that the policies and recommendations included within the open space study are enshrined in the</p>	<p>New provision of open space to be provided as part of new development where there are deficiencies in quality or access to open space.</p>	<p>New Local Plan should reflect the policies and recommendations within the Open Space, Sports and Recreation Study.</p>

Indicator	Trend/Key Finding	Target	Implication												
	Local Plan.  Source: Tunbridge Wells Borough Council (2018) <a href="#">Open Space Study</a>														
Participation in sport and leisure	Key issues for the borough are presented within the Open Space <a href="#">Community and Stakeholder Consultation Report</a> . The main issues are: -Lack of quality outdoor space for teenagers and MUGAs -Quality of walk/cycle routes -Accessibility of local open space -improvements to sports and leisure centres required	Various targets relating to Sports and Recreation Study	New Local Plan should encourage sport and allocate land for sports in appropriate locations.												
Affordable housing	<table border="1"> <thead> <tr> <th>Year</th> <th>Affordable Homes</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>108</td> </tr> <tr> <td>2016/17</td> <td>139</td> </tr> <tr> <td>2017/18</td> <td>61</td> </tr> <tr> <td>2018/19</td> <td>72</td> </tr> </tbody> </table> <p>Average over last decade: 82.53 per annum</p> <p>The latest SHMA predicts a need of 341 households per year for affordable housing. Source: Tunbridge Wells Borough Council (2017) <a href="#">Strategic Housing Market Assessment</a></p>	Year	Affordable Homes	2015/16	108	2016/17	139	2017/18	61	2018/19	72	Current target is 70 units per year	More affordable homes are urgently required.		
Year	Affordable Homes														
2015/16	108														
2016/17	139														
2017/18	61														
2018/19	72														
Childhood obesity rates	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>SE</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>Age 4-5</td> <td>12.7%</td> <td>12.7%</td> <td>12.9%</td> </tr> <tr> <td>Age 10-11</td> <td>12.9%</td> <td>13.4%</td> <td>14.1%</td> </tr> </tbody> </table> <p>Obesity rates in TWB children (average for 2018/2019) follow the same trend as in the South East and England, albeit slightly less prevalent. Long term trends are for a rise in childhood obesity in the past 2 decades. Source: Public Health England (2020) <a href="#">Obesity Profile</a></p>		TWB	SE	England	Age 4-5	12.7%	12.7%	12.9%	Age 10-11	12.9%	13.4%	14.1%	n/a	The new Local Plan should help support a reduction in childhood obesity.
	TWB	SE	England												
Age 4-5	12.7%	12.7%	12.9%												
Age 10-11	12.9%	13.4%	14.1%												
Children in poverty	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2018/19</td> <td>9.2%</td> <td>14.7%</td> <td>15.3%</td> </tr> </tbody> </table> <p>Half of the borough is within the 20% of districts in the country with the lowest levels of child poverty. In Kent, Tunbridge Wells has the lowest number and proportion of children in all age groups living in absolute low income families.  Source: KCC (2020) <a href="#">Child Poverty</a></p>		TWB	KCC	ENGLAND	2018/19	9.2%	14.7%	15.3%	National target set by the Child Poverty Act 2010: 1.7million or fewer children live in poverty by 2020.	Although forecasts predict national targets will be missed, rates of child poverty in the borough are relatively low.  This topic is not a priority for the new Local Plan.				
	TWB	KCC	ENGLAND												
2018/19	9.2%	14.7%	15.3%												
Cycling rates	<table border="1"> <thead> <tr> <th></th> <th>Cycle at least least once a month</th> <th>Cycle at once a week</th> </tr> </thead> <tbody> <tr> <td>TWB (2019)</td> <td>19.4</td> <td>14.1</td> </tr> <tr> <td>Kent</td> <td>16.3</td> <td>10.6</td> </tr> </tbody> </table>		Cycle at least least once a month	Cycle at once a week	TWB (2019)	19.4	14.1	Kent	16.3	10.6	n/a	Frequent cycling is limited to a certain population demographic.  The new Local Plan should seek to encourage cycling for all			
	Cycle at least least once a month	Cycle at once a week													
TWB (2019)	19.4	14.1													
Kent	16.3	10.6													



Indicator	Trend/Key Finding	Target	Implication																														
	<p>(2019)</p> <p>England 16.1 11.2 (2019)</p> <p>TWB ranks highest in Kent for cycling once a month and one per week, which is also higher than the national average.</p> <p>Source: OGL (2020) <a href="#">Walking and cycling statistics, England: 2019</a></p>		able residents.																														
Demand for rail services	<p>Between 2017 and 2019, demand for rail services increased as follows:</p> <table> <tr> <td>Ashurst</td> <td>15% ↑</td> </tr> <tr> <td>High brooms</td> <td>0.5% ↑</td> </tr> <tr> <td>Paddock Wood</td> <td>7% ↑</td> </tr> <tr> <td>Tunbridge Wells</td> <td>0.7% ↑</td> </tr> </table> <p>Source: Office of Rail and Road (2020) <a href="#">Estimation of station usage</a></p>	Ashurst	15% ↑	High brooms	0.5% ↑	Paddock Wood	7% ↑	Tunbridge Wells	0.7% ↑	n/a	The new Local Plan should prioritise easy access to train stations both in the borough and in neighbouring local authorities.																						
Ashurst	15% ↑																																
High brooms	0.5% ↑																																
Paddock Wood	7% ↑																																
Tunbridge Wells	0.7% ↑																																
Dwelling, population and age structure forecasts	<table> <thead> <tr> <th>2015-2031</th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>Age 0-4:</td> <td>↓ 12%</td> <td>↑ 5%</td> </tr> <tr> <td>Age 5-11:</td> <td>↓ 6%</td> <td>↑ 16%</td> </tr> <tr> <td>Ages 12-18:</td> <td>↑ 5%</td> <td>↑ 9%</td> </tr> <tr> <td>Ages 19-24:</td> <td>↓ 13%</td> <td>↑ 5%</td> </tr> <tr> <td>Ages 25-35:</td> <td>↓ 15%</td> <td>↑ 7%</td> </tr> <tr> <td>Ages 36-50:</td> <td>↓ 6%</td> <td>↑ 1%</td> </tr> <tr> <td>Ages 51-65:</td> <td>↑ 10%</td> <td>↑ 12%</td> </tr> <tr> <td>Ages 66-80:</td> <td>↑ 25%</td> <td>↑ 33%</td> </tr> <tr> <td>Ages 81+:</td> <td>↑ 79%</td> <td>↑ 50%</td> </tr> </tbody> </table> <p>Flight of young working age residents in TWB is reflected in the declining number of under 5s and school age children.</p> <p>The recent baby-boom will be felt in TWB at secondary school level during the plan period.</p> <p>Rising life expectancy is reflecting in the increasing aging population.</p> <p>Demographic changes will bring about an increase in the older population.</p> <p>Increase in number of children, lone parents and Black and Ethnic Minority Groups expected in new few years.</p> <p>These groups have a greater reliance on rented accommodation.</p> <p>Self and custom build homes are a potential growth sector in the future.</p> <p>Source: KCC (2020) <a href="#">Population and census data</a></p>	2015-2031	TWB	KCC	Age 0-4:	↓ 12%	↑ 5%	Age 5-11:	↓ 6%	↑ 16%	Ages 12-18:	↑ 5%	↑ 9%	Ages 19-24:	↓ 13%	↑ 5%	Ages 25-35:	↓ 15%	↑ 7%	Ages 36-50:	↓ 6%	↑ 1%	Ages 51-65:	↑ 10%	↑ 12%	Ages 66-80:	↑ 25%	↑ 33%	Ages 81+:	↑ 79%	↑ 50%	n/a	<p>Education provision during the plan period should reflect an increase in secondary school aged children.</p> <p>The significant rise in the elderly population will create critical housing and care issues.</p> <p>Facilities and services should reflect both these issues.</p> <p>There will be potential for growth in private rented sector. Quality of housing in the private rented sector must be ensured.</p> <p>The self and custom build home sector must be supported.</p>
2015-2031	TWB	KCC																															
Age 0-4:	↓ 12%	↑ 5%																															
Age 5-11:	↓ 6%	↑ 16%																															
Ages 12-18:	↑ 5%	↑ 9%																															
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Ages 66-80:	↑ 25%	↑ 33%																															
Ages 81+:	↑ 79%	↑ 50%																															
Excess winter mortality	<p>In Tunbridge Wells, 8.6% of households are estimated to be living in fuel poverty. This is approximately 4157 households. This proportion is equal to the Kent average but higher than the South East average (8.1%18).</p> <p>The local value (3 year average) for excess winter deaths is 27.6 is significantly higher than the England 3 year average which is 16.5</p>	n/a	<p>Reasons are complicated but a high number of pre 1919 properties in the borough play a part. Listing, solid walls and large windows mean these properties are not well insulated.</p> <p>The Local Plan should seek to rectify this.</p>																														

Indicator	Trend/Key Finding	Target	Implication
	Sources: Apho (2019) <a href="#">Public Health Guide</a> TWBC (2015) <a href="#">Mind the Gap Health Inequalities Action Plan 2015-19</a>		
Fear of crime	The TWB Community Safety Strategic Assessment and Partnership Plan indicates that Tunbridge Wells had the lowest overall crime rate in Kent between 2018 -19, with a 6% annual reduction in crime.  There have been reductions in all crime, victim-based crime, violent crime and sexual offences in TWB.  Source: Tunbridge Wells Borough Council (2020) <a href="#">Strategic Assessment and Partnership Plan 2020/21</a>	n/a	The new Local Plan should seek to reduce fear of crime rates by encouraging good design.  This should be a lower priority issue.
Health deprivation inequalities	The most deprived areas of the borough for health are located within the following areas: <ul style="list-style-type: none"> <li>• Sherwood</li> <li>• Rusthall</li> <li>• Southborough and High Brooms</li> <li>• Broadwater</li> </ul> Tunbridge Wells is one of the 20% least deprived districts/unitary authorities in England Levels of teenage pregnancy (13.5%), GCSE attainment (74.4%) and unemployment (0.7%11) are better than the England average. There is a shortage of affordable housing in Tunbridge Wells, particularly in the rural areas. Access to goods and services in rural areas also presents a barrier. This indicates a need for community based services.  Sources: TWBC (2015) <a href="#">Mind the Gap Health Inequalities Action Plan 2015-19</a> Public Health England (2020) <a href="#">Tunbridge Wells Local Authority Health Profile 2019</a>	n/a	There are pockets of health deprivation within the borough around Tunbridge Wells, Hawkhurst and Cranbrook.  The new Local Plan should seek to address this imbalance by improving access to exercise and healthy eating and drinking in the vulnerable locations.
Health service provision	Within the Tunbridge Wells borough, there are 18 existing General Practices, which fall within three clusters: Tunbridge Wells, Weald, and Tonbridge. The infrastructure Delivery Plan (IDP) 2020 prioritises the provision of health care in the following settlements: <ul style="list-style-type: none"> <li>• RTW – New general practice premises within the town</li> <li>• Paddock Wood/Capel parish – One new GP practice should be commissioned and allocated</li> <li>• Pembury – Extension to the existing GP practice</li> <li>• Hawkhurst – One new GP premises as an amalgamation</li> </ul>	TBC	Support the findings of the upcoming IDP by allocating growth in locations where health-related infrastructure can cope with increased demand.

Indicator	Trend/Key Finding	Target	Implication																								
	<p>of the existing two practices.</p> <ul style="list-style-type: none"> <li>Horsmonden – New practice premises to serve this area</li> </ul> <p>Source: TWBC (2020) Draft Infrastructure Delivery Plan</p>																										
Homelessness and temporary accommodation	<p>In the last 5 years, the number of people accepted as homeless and in priority need in TW has followed national and regional trends. Demands for temporary accommodation follow similar trends.</p> <p>Across Kent, the number of households presenting themselves as homeless have doubled between 2013 – 2015 to 191 households.</p> <p>The number of rough sleepers in Kent has more than doubled since 2011.</p> <p>Source: West Kent <a href="#">Housing and Homelessness Strategy 2016 – 2021</a></p>	n/a	Trends reflect increasing demand for social rented housing stock. The new local Plan should seek to address this demand.																								
House price to earnings ratio	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>South East</th> <th>NOTES</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>12.32</td> <td>10.20</td> <td>2<sup>nd</sup></td> </tr> <tr> <td>2018</td> <td>12.63</td> <td>10.48</td> <td>2<sup>nd</sup></td> </tr> <tr> <td>2017</td> <td>13.16</td> <td>10.38</td> <td>2<sup>nd</sup></td> </tr> <tr> <td>2016</td> <td>11.69</td> <td>9.92</td> <td>2<sup>nd</sup></td> </tr> <tr> <td>2015</td> <td>10.79</td> <td>9.20</td> <td>2<sup>nd</sup></td> </tr> </tbody> </table> <p>highest in Kent</p> <p>In the period between 2015 and 2019, TWB had the 2<sup>nd</sup> highest house price to earnings ratio in Kent.</p> <p>It is assumed that this trend would continue over the plan period.</p> <p>Average earnings in TWB are the highest in Kent (£650 per week gross) suggesting affordability pressures stem from high house prices rather than low incomes.</p> <p>Source: Office for National Statistics (2020) <a href="#">House price (existing dwellings) to workplace-based earnings ratio dataset.</a></p>		TWB	South East	NOTES	2019	12.32	10.20	2 <sup>nd</sup>	2018	12.63	10.48	2 <sup>nd</sup>	2017	13.16	10.38	2 <sup>nd</sup>	2016	11.69	9.92	2 <sup>nd</sup>	2015	10.79	9.20	2 <sup>nd</sup>	n/a	Housing in the borough is expensive. More affordable housing is needed.
	TWB	South East	NOTES																								
2019	12.32	10.20	2 <sup>nd</sup>																								
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Household structure forecasts	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th></th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>2.36</td> <td>2.36</td> <td>Persons per dwelling</td> </tr> <tr> <td>2023</td> <td>2.26</td> <td>2.30</td> <td>Persons per dwelling</td> </tr> <tr> <td>2033</td> <td>2.20</td> <td>2.24</td> <td>Persons per dwelling</td> </tr> </tbody> </table> <p>Average household size will slowly decline over the plan period.</p> <p>Key SHMA finding: Focus of new market housing provision should be on 2 and 3 bed properties which would suit expanding families and older households downsizing.</p>		TWB	KCC		2013	2.36	2.36	Persons per dwelling	2023	2.26	2.30	Persons per dwelling	2033	2.20	2.24	Persons per dwelling	n/a	<p>The decline is not significant enough to affect housing type provision.</p> <p>Focus on 2 and 3 bed market housing properties should continue.</p>								
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Indicator	Trend/Key Finding	Target	Implication																																
	<p>Sources: KCC (2020) <a href="#">Population and census data</a> Tunbridge Wells Borough Council (2017) <a href="#">Strategic Housing Market Assessment</a></p>																																		
Indices of multiple deprivation	<p>Most deprived areas of the borough are located within the following areas:</p> <ul style="list-style-type: none"> <li>• Broadwater</li> <li>• Rusthall</li> <li>• St James</li> <li>• St Johns</li> <li>• Sherwood</li> <li>• Southborough and High Brooms</li> </ul> <p>This index considers income, employment, education, skills and training, health deprivation and disability, crime, barriers to housing and services, and living environment deprivation.</p> <p>Tunbridge Wells continues to rank as the least deprived local authority in Kent.</p> <p>Source: KCC (2020) <a href="#">The Index of Multiple Deprivation: Headline findings for Kent</a></p>	n/a	<p>Pockets of deprivation continue to exist within the borough and are all located within Tunbridge Wells.</p> <p>The new Local Plan should seek to help these locations.</p>																																
Life expectancy at birth	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>♀ years</td> <td>84.5</td> <td>83.4</td> <td>80.6</td> </tr> <tr> <td>♂ years</td> <td>81.1</td> <td>79.9</td> <td>84.5</td> </tr> </tbody> </table> <p>(2016-18)</p> <p>TWB has second highest male and female life expectancy in Kent.</p> <p>Male life expectancy in Kent increased from 78.6 years in 2006/08 to 79.9 years in 2016/18.</p> <p>Female life expectancy at birth in Kent increased from 82.3 years in 2006/08 to 83.4 years in 2016/18.</p> <p>Source: KCC (2020) <a href="#">Life Expectancy at Birth Bulletin</a></p>		TWB	KENT	ENGLAND	♀ years	84.5	83.4	80.6	♂ years	81.1	79.9	84.5	n/a	<p>Female life expectancy is increasing at an ever faster rate. Even more housing and care for elderly females will be required in the future.</p> <p>TWB will continue to require suitable housing and care for elderly males in the future.</p>																				
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	Heart Fail. 0.67    0.7    9 <sup>th</sup> Hyperten. 13.24    14.7    12 <sup>th</sup> Stroke    1.87    1.81    6 <sup>th</sup> Mental    0.93    0.82    3 <sup>rd</sup> Dementia 0.82    0.82    6 <sup>th</sup> *column shows how TWB is ranked in Kent compared with other districts e.g. 1 <sup>st</sup> = TW has highest prevalence in Kent. Source: Kent Public Health Observatory (2020) <a href="#">Health and Social Care Maps</a>	stroke and dementia. The recorded rates are less than the predicted rates for all these illnesses which is likely to mean sufferers are undiagnosed due to not attending/being registered with a GP.	should seek to address. Asthma rates are high so improving air quality will be important for the next local plan. Likewise, relatively high rates of strokes, mental illness and cancer suggest there is scope to raise awareness and provide for specialist health care over the plan period.																																																
Long term vacant dwellings	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>NOTES</th> </tr> </thead> <tbody> <tr> <td>2019:</td> <td>377</td> <td>5,370</td> <td>4<sup>th</sup> lowest in Kent</td> </tr> <tr> <td>2018:</td> <td>405</td> <td>5,028</td> <td>5<sup>th</sup> lowest in Kent</td> </tr> <tr> <td>2017:</td> <td>448</td> <td>4,778</td> <td>6<sup>th</sup> lowest in Kent</td> </tr> <tr> <td>2016:</td> <td>376</td> <td>4,999</td> <td>8<sup>h</sup> lowest in Kent</td> </tr> <tr> <td>2015:</td> <td>276</td> <td>4,496</td> <td>4<sup>th</sup> lowest in Kent</td> </tr> </tbody> </table> Vacant dwellings have generally been declining in the past 5 years. The declines in TWB are not significantly different from other authorities in Kent. Source: KCC (2020) <a href="#">Housing Stock 2019 Kent Local Authorities</a>		TWB	KENT	NOTES	2019:	377	5,370	4 <sup>th</sup> lowest in Kent	2018:	405	5,028	5 <sup>th</sup> lowest in Kent	2017:	448	4,778	6 <sup>th</sup> lowest in Kent	2016:	376	4,999	8 <sup>h</sup> lowest in Kent	2015:	276	4,496	4 <sup>th</sup> lowest in Kent	n/a	Long term vacant dwellings are declining.  Not a high priority issue.																								
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National Health Indicators	32 indicators considered in total. Hospital stays for self-harm. Data standardised for age and sex (cases per 100,000): <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>2018/19:</td> <td>239</td> <td>200</td> <td>194</td> </tr> </tbody> </table> Suicide rate. Data standardised for age and sex (cases per 100,000): <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>2017 – 19:</td> <td>10</td> <td>10</td> <td>10</td> </tr> </tbody> </table> Killed and seriously injured casualties on England's roads. Data standardised for age and sex (cases per 100,000): <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>2016 – 18:</td> <td>47</td> <td>50</td> <td>43</td> </tr> </tbody> </table> Estimated diabetes diagnosis rate. Data standardised for age and sex: <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>2018:</td> <td>72%</td> <td>75%</td> <td>78%</td> </tr> </tbody> </table> Estimated dementia diagnosis rate (aged 65 and over). <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>2020:</td> <td>63%</td> <td>65%</td> <td>67%</td> </tr> </tbody> </table> Smoking prevalence in adults in routine and manual occupations. Data standardised for age and sex: <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>18%</td> <td>12%</td> <td>14%</td> </tr> </tbody> </table> Source: Public Health England (2020) <a href="#">Tunbridge Wells Local Authority Health Profile</a>		TWB	KCC	England	2018/19:	239	200	194		TWB	KCC	England	2017 – 19:	10	10	10		TWB	KCC	England	2016 – 18:	47	50	43		TWB	KCC	England	2018:	72%	75%	78%		TWB	KCC	England	2020:	63%	65%	67%		TWB	KCC	England	2019	18%	12%	14%	n/a	Improved mental health support services must be a priority.
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People who provide unpaid care	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2011:</td> <td>9%</td> <td>11%</td> <td>10%</td> </tr> </tbody> </table> In Kent, TW has the lowest proportion		TWB	KCC	ENGLAND	2011:	9%	11%	10%	n/a	There are relatively few unpaid carers in TW.																																								
	TWB	KCC	ENGLAND																																																
2011:	9%	11%	10%																																																

Indicator	Trend/Key Finding	Target	Implication																				
	of people who provide unpaid care. Source: KCC (2013) <a href="#">2011 Census: Health and provision of unpaid care in Kent</a>		This is a lower priority for the new Local Plan.																				
People with long term disability which limits day to day activities	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>14%</td> <td>18%</td> <td>18%</td> </tr> </tbody> </table> <p>In Kent, TWB has the lowest proportion of people with a long-term disability that limits day to day activities a little and the 3<sup>rd</sup> lowest with a disability that limits day to day activities a lot.</p> <p>Source: KCC (2020) <a href="#">Disability in Kent</a></p>		TWB	KCC	ENGLAND	2011	14%	18%	18%	n/a	<p>Rates of limited disabilities are relatively low in Tunbridge Wells.</p> <p>This should be a lower priority for the new Local Plan.</p>												
	TWB	KCC	ENGLAND																				
2011	14%	18%	18%																				
Percentage of households in fuel poverty	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>Rank*</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>7.3%</td> <td>8.9%</td> <td>2<sup>nd</sup> best</td> </tr> <tr> <td>2017</td> <td>9%</td> <td>9.5%</td> <td>6<sup>th</sup></td> </tr> <tr> <td>2015</td> <td>9.7%</td> <td>9.9%</td> <td>4<sup>th</sup> worse</td> </tr> <tr> <td>2014</td> <td>9.8%</td> <td>8.9</td> <td>2<sup>nd</sup> worse</td> </tr> </tbody> </table> <p>*column shows how TWB is ranked in Kent compared with other districts TWB has an average to high rate of fuel poverty compared with other areas. Source: OGL (2020) <a href="#">Fuel poverty sub-regional statistics</a></p>		TWB	KENT	Rank*	2018	7.3%	8.9%	2 <sup>nd</sup> best	2017	9%	9.5%	6 <sup>th</sup>	2015	9.7%	9.9%	4 <sup>th</sup> worse	2014	9.8%	8.9	2 <sup>nd</sup> worse	Fuel Poverty (England) Regulations 2014 state those people who live in fuel poverty must (as far as reasonably applicable) live in a home with a minimum energy efficiency of band C by 2030.	Energy efficiency of new and existing homes should be improved in line with the target specified.
	TWB	KENT	Rank*																				
2018	7.3%	8.9%	2 <sup>nd</sup> best																				
2017	9%	9.5%	6 <sup>th</sup>																				
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Percentage of people describing their own health as good or very good	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> <th>ENGLAND</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>85%</td> <td>81.6%</td> <td>81%</td> </tr> </tbody> </table> <p>People describing their health as good or very good is higher in TWB than any other Kent district (census data).</p> <p>Source: Tunbridge Wells Borough Council (2017) <a href="#">Strategic Housing Market Assessment</a></p>		TWB	KENT	ENGLAND	2011	85%	81.6%	81%	n/a	People's opinion of their own health is very high. Thus, improving this aspect is a low priority.												
	TWB	KENT	ENGLAND																				
2011	85%	81.6%	81%																				
Rate and type of crime	<p>TWB has one of the lowest rates of crime in Kent.</p> <p>Total rates of crime in TWB have not changed significantly in the past 5 years.</p> <p>The 3 most common types of crime in TWB during the last 5 years were anti-social behaviour, violent crime, and criminal damage and arson.</p> <p>Source: UK Crime Stats (2020) <a href="#">Tunbridge Wells, England</a></p>	n/a	<p>The new Local Plan should seek to reduce crime rates by encouraging good design.</p> <p>This should be a lower priority issue.</p>																				
Rates of physical activity	<p>Percentage of physical active adults (2018-19) - 80%</p> <p>Percentage of physically inactive adults 2018-19) - 10.8%</p> <p>Percentage of physically active children and young people (2018-19) - 31.7%</p> <p>Sources: TWBC Environmental Health Team PHE (2020) <a href="#">Tunbridge Wells Physical Activity</a></p>	n/a	<p>Physical activity levels in Tunbridge Wells, Southborough, Cranbrook and Paddock Wood require improvement.</p> <p>Vulnerable population groups must be targeted.</p>																				

Indicator	Trend/Key Finding	Target	Implication
Selective non-private schools	<p><b>TW KENT RANK</b></p> <p>Selective 44% 33% Joint 1st</p> <p>TW has a higher than average number of selective non private secondary schools which is reflected by higher than average attainment levels in the borough. However, this has implications for social mobility of children from poorer backgrounds.</p> <p>Source: Kelsi (2020) <a href="#">Facts and Figures</a></p>	n/a	If population forecasts are correct and another secondary school is required within the borough during the plan period, a non-selective school should be prioritised.
Traffic, road safety and congestion	<p>RTW is the borough's primary retail, employment and education centre and peak hour congestion along the key routes is significant. The annual average daily flow of RTW is 90,000 vehicles.</p> <p>Other congested parts of the borough include:</p> <ul style="list-style-type: none"> <li>• A21 (Kiplings Cross to Lamberhurst)</li> <li>• A228 (restricted width sections)</li> <li>• A229 (particularly at Hawkhurst crossroads)</li> <li>• North Farm estate</li> </ul> <p>Due to the prevalence of rural roads and busy interurban roads, TWB ranks highly in the county for road crashes.</p> <p>Priority transport projects:</p> <ul style="list-style-type: none"> <li>• Pembury Rd A263 capacity improvements</li> <li>• London Rd/St John's Rd A26 capacity improvements</li> <li>• North Farm infrastructure improvements</li> <li>• RTW town centre public space improvements</li> <li>• Network of key cycling routes</li> <li>• Speed reduction projects in priority locations</li> <li>• Lobby for duelling of A21 (Kiplings Cross to Lamberhurst)</li> <li>• A228 Colts Hill Improvement scheme</li> </ul> <p>Source: TWBC (2015) <a href="#">Transport Strategy 2015 -2026</a></p>	n/a	The new local plan should support the 8 priority transport projects identified by the Transport Strategy 2015.
Travel to work	<p>(2011) <b>TWB SE ENGLAND</b></p> <p>Train: 14% 7% 9%</p> <p>Bus: 2% 4% 7%</p> <p>Car driver: 50% 57% 54%</p> <p>Car passenger: 4% 5% 5%</p> <p>Bike: 1% 3% 3%</p> <p>On foot: 13% 10% 10%</p> <p>Home working: 14% 12% 10%</p> <p>Popular methods of travel to work in TWB are train, car and on foot. Least</p>	n/a	<p>Bus and cycling improvements are necessary to encourage residents away from car travel, particularly in rural areas.</p> <p>Employment should be focused on locations easily accessible by public transport.</p> <p>New development should seek to support</p>

Indicator	Trend/Key Finding	Target	Implication								
	<p>popular are bus and bike. A high proportion of residents work from home. Due to the 2020 pandemic, it is expected that this trend will become more prevalent as people are encouraged to work from home.</p> <p>Source: Office for National Statistics (2020) <a href="#">Methods of travel to work dataset</a></p>		<p>home working e.g. through fast broadband connections.</p>								
Wellbeing	<p>A growing body of evidence is linking mental and physical wellbeing with access to heritage natural green spaces.</p> <p>Accessible Natural Greenspace Standards (ANGst):</p> <p><b>Distance to open space</b></p> <p><b>Percentage of households in TWB:</b></p> <table border="0"> <tr> <td>300m to a 2ha space</td> <td>34%</td> </tr> <tr> <td>2km of 20ha space</td> <td>77%</td> </tr> <tr> <td>5km of 100ha space</td> <td>71%</td> </tr> <tr> <td>10km of 500 ha space</td> <td>9%</td> </tr> </table> <p>In relation to heritage, 93% of residents agree that local heritage has an impact upon their quality of life (nationwide survey).</p> <p>Source: KCC (2016) <a href="#">Greenspace Needs Assessment Tunbridge Wells</a></p>	300m to a 2ha space	34%	2km of 20ha space	77%	5km of 100ha space	71%	10km of 500 ha space	9%	<p>Natural England recommends that all households should meet the ANGst.</p> <p>Historic England recommends heritage assets be protected for the sake of personal wellbeing.</p>	<p>The new Local Plan should support provision for and accessibility to natural green spaces.</p> <p>The new Local Plan should support access to heritage assets.</p>
300m to a 2ha space	34%										
2km of 20ha space	77%										
5km of 100ha space	71%										
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## Economic Indicators Analysis

Table 139. Analysis of economic baseline indicators and implication for new Local Plan

Evidence	Trend	Target	Implication																		
3 Year Business Survival Rates	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>62%</td> <td>59%</td> </tr> <tr> <td>2017</td> <td>62%</td> <td>63%</td> </tr> <tr> <td>2016</td> <td>66%</td> <td>62%</td> </tr> <tr> <td>2015</td> <td>60%</td> <td>58%</td> </tr> <tr> <td>2014</td> <td>64%</td> <td>60%</td> </tr> </tbody> </table> <p>The proportion of new businesses which remain surviving after 3 years trading in TWB has followed a similar trend to KCC (declining over the past 5 years) but is generally higher in TWB than the KCC average.</p> <p>Sources: Tunbridge Wells (2016) <a href="#">Economic Needs Study</a> KCC (2019) <a href="#">Kent Economic Indicators 2019</a></p>		TWB	KCC	2018	62%	59%	2017	62%	63%	2016	66%	62%	2015	60%	58%	2014	64%	60%	n/a	Support for new business must be provided by the new Local Plan.
	TWB	KCC																			
2018	62%	59%																			
2017	62%	63%																			
2016	66%	62%																			
2015	60%	58%																			
2014	64%	60%																			
Availability of services and facilities	<p>The key services identified in TWB are:</p> <ul style="list-style-type: none"> <li>• post office</li> <li>• convenience store</li> <li>• public house</li> <li>• doctors surgery</li> <li>• primary school</li> <li>• secondary school</li> <li>• frequent bus service (hourly Monday to Saturday)</li> <li>• train station</li> <li>• supermarket</li> </ul> <p>The Settlement Role and Function Study (2020) identifies that the larger settlements, including Paddock Wood, Cranbrook and Hawkhurst, tend to score more highly across the range of sustainability indicators identified in terms of the level of provision of services and facilities</p> <p>In 2020 businesses have been affected by the pandemic but the latest Settlement Role and Function study (2020) will take this in to account.</p> <p>Source: TWBC Draft Settlement Role and Function Study 2020.</p>	TBC	Housing growth should be focussed only in locations with suitable services and facilities.																		
Broadband connectivity	<p>95% of properties across Kent and Medway can now access a superfast broadband service of at least 24mbps.</p> <p>BDUK and Openreach are working together to connect an additional 5,000 rural homes and businesses with no or slow broadband with gigabit capable, fibre-to-the-premise broadband.</p> <p>Source: KCC (2020) <a href="#">Broadband Programme</a></p>	n/a	The new Local Plan should seek to ensure the 'final 5% areas' also have superfast broadband.																		
Gross Value Added per Head	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>£30,679</td> <td>£23,149</td> </tr> <tr> <td>2018</td> <td>£31,409</td> <td>£22,395</td> </tr> <tr> <td>2017</td> <td>£28,699</td> <td>£21,799</td> </tr> <tr> <td>2016</td> <td>£25,503</td> <td>£21,194</td> </tr> </tbody> </table>		TWB	KCC	2019	£30,679	£23,149	2018	£31,409	£22,395	2017	£28,699	£21,799	2016	£25,503	£21,194	n/a	The population of TWB is generally prosperous.			
	TWB	KCC																			
2019	£30,679	£23,149																			
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2017	£28,699	£21,799																			
2016	£25,503	£21,194																			

Evidence	Trend	Target	Implication																		
	<p>2015      £23,701      £20,469 Residents of TWB contribute more to the economy than the average for KCC. The Information, communication and professional sectors has contributed the most to this trend.</p> <p>Sources: Tunbridge Wells <a href="#">Economic Needs Study (2016)</a> KCC (2019) <a href="#">Kent Economic Indicators 2019</a></p>																				
Knowledge Economy (a key driver for economic growth)	<p>TWB has the third highest proportion of employees whose main purpose centres on knowledge or information in KCC (23.5%). TWB has seen the biggest decline in the knowledge economy of -45.5% between 2015 – 2018. Industries that fall in this category are likely to have high dependency on technology and provide highly skilled and technical jobs.</p> <p>Source: KCC (2019) <a href="#">The Knowledge Economy</a></p>		The growth and importance of the knowledge economy in the borough is significant and must be maintained by the new Local Plan through attractions for employers such as fast broadband speeds and suitable premises.																		
NVQ4 or higher	<table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>50%</td> <td>35%</td> </tr> <tr> <td>2018</td> <td>40%</td> <td>34%</td> </tr> <tr> <td>2017</td> <td>49%</td> <td>37%</td> </tr> <tr> <td>2016</td> <td>45%</td> <td>34%</td> </tr> <tr> <td>2015</td> <td>40%</td> <td>32%</td> </tr> </tbody> </table> <p>The number of residents in TWB borough that are qualified to degree level or equivalent or above, fluctuates from year to year but has been generally increasing at a similar rate to the KCC average. TWB NVQ4 or higher are well above the national median, which is within the top 20% of all English authorities. The workforce contains a greater proportion of people with lower level qualifications.</p> <p>Source: KCC (2019) <a href="#">Kent Economic Indicators 2019</a></p>		TWB	KCC	2019	50%	35%	2018	40%	34%	2017	49%	37%	2016	45%	34%	2015	40%	32%	n/a	The local plan should ensure that residents continue to gain a high level of qualification through supporting education services.
	TWB	KCC																			
2019	50%	35%																			
2018	40%	34%																			
2017	49%	37%																			
2016	45%	34%																			
2015	40%	32%																			
Resident labour supply (2015 - 2031)	<p>Taking into account births, deaths, natural change and net migration, the TWB resident labour supply will increase by 0.8% over the plan period.</p> <p>Source: Tunbridge Wells Borough Council (2017) <a href="#">Strategic Housing Market Assessment</a></p>	n/a	Insignificant change.																		
Significant Industries	<p>The biggest growth industries in TWB in 2018 were:</p> <ul style="list-style-type: none"> <li>• Wholesale and retail trade</li> <li>• Professional, scientific and technical</li> <li>• Human health and social work</li> </ul> <p>The biggest industries as a whole in TWB in 2017 were:</p> <ul style="list-style-type: none"> <li>• Wholesale and retail trade</li> <li>• Human health and social work</li> <li>• Education</li> </ul> <p>The smallest industries in TWB in 2018 were:</p> <ul style="list-style-type: none"> <li>• Arts, recreation and entertainment</li> <li>• Public administration and defence</li> <li>• Real estate activities</li> </ul>	n/a	The new Local Plan should support industries that contribute most highly to the local economy.																		

Evidence	Trend	Target	Implication																																		
	<p>The latest Economic Development Strategy (2018) sets out the sector strengths which include finance &amp; insurance, scientific &amp; technical, wholesale &amp; retail and human health &amp; social work.</p> <p>Sources: KCC (2020) <a href="#">Business Register and Employment Survey results for 2019</a> Tunbridge Wells <a href="#">Economic Development Strategy 2018 - 2021</a> KCC (2019) <a href="#">The Knowledge Economy</a></p>																																				
Tourism	<p>Average for 2015 – 2017</p> <table border="1"> <thead> <tr> <th></th> <th>TWB</th> <th>KCC</th> </tr> </thead> <tbody> <tr> <td>Num. of Visitors</td> <td>4.7m</td> <td>65m</td> </tr> <tr> <td>Overnight stays</td> <td>311,000</td> <td>4.9m</td> </tr> <tr> <td>Spend (£)</td> <td>278m</td> <td>3.8bn</td> </tr> </tbody> </table> <p>TWB attracts relatively few tourists compared to other Kent districts. Neighbouring districts of Wealden and Rother also attract at least double the spend and near double the number of nights stay as TWB. The Covid-19 pandemic has significantly impact tourism due to travel restriction and socially distancing measures put in place under government guidance.</p> <p>Sources: TWBC <a href="#">Visitor's Visitor Economy Infographic</a> TWBC <a href="#">Destination Management Plan for Tunbridge Wells 2013-16</a></p>		TWB	KCC	Num. of Visitors	4.7m	65m	Overnight stays	311,000	4.9m	Spend (£)	278m	3.8bn	TWB to be widely recognised as ideal short break destination by 2020 (TW Destination Management Plan).	<p>Tourism is a less important in TWB compared with other districts in the region.</p> <p>The new Local Plan should attempt to strengthen this part of the local economy.</p>																						
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Num. of Visitors	4.7m	65m																																			
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## Environmental Indicators Analysis

Table 140. Analysis of environmental baseline indicators and implication for new Local Plan

Evidence	Data and Trend	Target	Implication
Agricultural and woodland productivity	<p>TWB has large areas of good quality agricultural land. There are pockets of land graded as 3 or better in the centre of the borough and around Paddock Wood. However, more detailed analysis at local level throughout the borough would be required to accurately determine quality.</p> <p>No data on woodland productivity but if 2/3rds of existing woodland in TWB was actively managed (i.e. their increment harvested) this would equate to at least: 23,000m<sup>3</sup> per year.</p> <p>Of this, 6,000m<sup>3</sup> would be saw logs – which could be used locally, and &gt; 17,000 m<sup>3</sup> of lower quality wood which could be used as a sustainable and low carbon fuel source – having an energy value of 35,000MWh (equivalent to 3,500,000 litres of heating oil per year).</p> <p>Sources: Natural England (2012) <a href="#">Agricultural Land Classification Technical Information note</a> Matthew Woodcock, Forest Commission</p>	n/a	The new Local Plan should support continued development of housing on poor grade agricultural land in preference to best and most versatile.
Air Quality Management Areas	<p>Currently two roads in Tunbridge Wells:</p> <ul style="list-style-type: none"> <li>• A26 beginning at junction with Park Rd (Southborough) and finishing at the roundabout with Nevill Terrace.</li> <li>• Grosvenor Rd</li> </ul> <p>An improvement in baseline air quality may be seen as vehicle emissions are improved with advances in technology, Euro 6 standards and transition to electric vehicles. This improvement rate is often described as 2%pa for the first half of the plan period so will not create a significant long term change.</p> <p><b>TWBC is in the process of declaring a second AQMA in the borough in Hawkhurst. This AQMA will be located on the northern arm of the crossroads on Cranbrook Road.</b></p> <p><b>Source:</b> TWBC (2020) <a href="#">Air Quality</a></p>	n/a	Development in this region (and any other areas with poor air quality) must not contribute to poor air quality or put sensitive receptors at risk. The new Local Plan should seek to improve air quality in these locations.
Aircraft/rail Noise	<p>The Gatwick airport flight path falls within the west of TWB.</p> <p>The area west of TW has over 35 flights per day with flights per day falling from 35 to 10 as you travel west to east across the town.</p> <p>The rest of the borough has between 1 and 10 flights per day.</p> <p>There are two train lines and 3 train stations in the borough. Noise from these sources needs consideration.</p> <p>Source: John McCollough, Senior Environmental Health Officer</p>	n/a	Development within the areas of high flight numbers or railway noise should be avoided particularly residential developments or those for sensitive receptors.
Area of Outstanding Natural	<p>The High Weald AONB washes over 70% of the borough.</p> <p>In 2017, the condition was assessed as follows:</p>	n/a	The new Local Plan must protect and enhance this area.

Evidence	Data and Trend	Target	Implication																																								
Beauty	<p style="text-align: right;">Number of sub elements</p> <table border="0"> <tr> <td>Poor and under threat</td> <td style="text-align: right;">4</td> </tr> <tr> <td>Poor and vulnerable</td> <td style="text-align: right;">2</td> </tr> <tr> <td colspan="2"><hr/></td> </tr> <tr> <td>Average but under threat</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Average but vulnerable</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Average and stable</td> <td style="text-align: right;">2</td> </tr> <tr> <td colspan="2"><hr/></td> </tr> <tr> <td>Good but under threat</td> <td style="text-align: right;">4</td> </tr> <tr> <td>Good and stable</td> <td style="text-align: right;">1</td> </tr> </table> <p>Sources: High Weald AONB <a href="#">Management Plan 2019 - 2024</a>. TWBC (2016) <a href="#">Development Constraints Study</a></p>	Poor and under threat	4	Poor and vulnerable	2	<hr/>		Average but under threat	2	Average but vulnerable	2	Average and stable	2	<hr/>		Good but under threat	4	Good and stable	1																								
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Biodiversity Opportunity Areas	<p>There are 3 BOAs within the borough:</p> <ol style="list-style-type: none"> <li>(1) High Weald</li> <li>(2) Medway and Low Weald grassland and Wetland</li> <li>(3) Romney Marshes</li> </ol> <p>Source: TWBC (2019) <a href="#">Green Infrastructure Framework for Draft Local Plan</a></p>	Numerous	The targets for the BOAs should be supported by the new Local Plan.																																								
Climate change	<p>Kent's geographical location and population density mean that it is likely to suffer from some of the severest impacts of climate change in the UK. Key changes are below. By 2080:</p> <ul style="list-style-type: none"> <li>• summers are likely to be hotter by around 5°C to 6°C</li> <li>• winters are likely to be warmer by around 3°C to 4°C</li> <li>• summer rainfall is likely to decrease by 30% to 50%</li> <li>• winter rainfall is likely to increase by 20% to 30%</li> <li>• sea level rise is likely to increase by 0.8m</li> </ul> <p>These changes will have far-reaching impacts including:</p> <ul style="list-style-type: none"> <li>• Changes in species distribution, including invasive species, pests and disease</li> <li>• Water shortages in summer months</li> <li>• Heat exhaustion in vulnerable people</li> <li>• Increased flooding events</li> <li>• Transport route disruption</li> </ul> <p>Kent Climate Emergency Declaration was made in May 2019 to formally recognise and commit resources to addressing the climate emergency and set a target of net zero emissions by 2050 for Kent</p>	Net zero emissions by 2030	The new Local Plan must make provision for adaptation to the impacts of climate change.																																								

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	<p>and Medway.</p> <p>TWBC Climate Emergency Declaration was made in July 2019 to formally recognise and commit resources to addressing the climate emergency and set a target of net zero emissions by 2030 for the borough.</p> <p>Sources: Met Office (2020) <a href="#">UK Climate Projections</a> KCC (2020) <a href="#">Climate change risk and impact assessment</a></p>																																																														
CO <sub>2</sub> emissions per capita (tonnes)	<table border="1"> <thead> <tr> <th></th> <th>Industry/ Commercial</th> <th>Transport</th> <th>Domestic</th> <th>Total TWB</th> </tr> </thead> <tbody> <tr><td>2018</td><td>2.5</td><td>2.2</td><td>2.2</td><td>3.5</td></tr> <tr><td>2017</td><td>2.5</td><td>2.2</td><td>2.2</td><td>3.6</td></tr> <tr><td>2016</td><td>2.5</td><td>2.2</td><td>2.2</td><td>3.8</td></tr> <tr><td>2015</td><td>2.5</td><td>2.2</td><td>2.2</td><td>4.1</td></tr> <tr><td>2014</td><td>2.5</td><td>2.2</td><td>2.2</td><td>4.3</td></tr> <tr><td>2013</td><td>2.5</td><td>2.2</td><td>2.2</td><td>4.9</td></tr> <tr><td>2012</td><td>2.5</td><td>2.2</td><td>2.2</td><td>5.1</td></tr> <tr><td>2011</td><td>2.8</td><td>2.2</td><td>2.0</td><td>4.9</td></tr> <tr><td>2010</td><td>3.0</td><td>2.2</td><td>2.2</td><td>5.4</td></tr> <tr><td>2009</td><td>2.7</td><td>2.3</td><td>2.1</td><td>5.1</td></tr> <tr><td>2008</td><td>3.5</td><td>2.4</td><td>2.2</td><td>5.7</td></tr> </tbody> </table> <p><a href="#">Data source.</a></p>		Industry/ Commercial	Transport	Domestic	Total TWB	2018	2.5	2.2	2.2	3.5	2017	2.5	2.2	2.2	3.6	2016	2.5	2.2	2.2	3.8	2015	2.5	2.2	2.2	4.1	2014	2.5	2.2	2.2	4.3	2013	2.5	2.2	2.2	4.9	2012	2.5	2.2	2.2	5.1	2011	2.8	2.2	2.0	4.9	2010	3.0	2.2	2.2	5.4	2009	2.7	2.3	2.1	5.1	2008	3.5	2.4	2.2	5.7	Net zero emissions by 2030	Reduction target has not been achieved in all years (especially associated with transport). The new Local Plan must support further work in carbon reduction.
	Industry/ Commercial	Transport	Domestic	Total TWB																																																											
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Construction materials	<p>Materials are the biggest contributor to a development sites carbon footprint.</p> <p>The removal of the Code for Sustainable Homes and ability of local Authorities to require a developer meet high environmental standards, means a developer's choice of materials may be less stringent.</p> <p>Developers should aim to source materials locally and responsibly, and should choose materials with a low embodied energy and high recycled content. This data is often not captured thoroughly by Construction Environmental Management Plans.</p> <p>Source: EAUC (2020) <a href="#">BERR strategy for sustainable construction</a></p>	Materials used in construction to have the least environmental and social impact feasible (Government's Sustainable Construction Strategy)	With a high number of construction sites for housing developments expected in the plan period, the new Local Plan must help meet target for responsible sourcing of materials with a low environmental impact.																																																												
Construction waste	<p>The construction industry is responsible for 24% of all waste in the UK. 19% of this is from materials that are delivered and unused, and 12% of this waste is sent straight to landfill.</p> <p>Sources: EAUC (2020) <a href="#">BERR strategy for sustainable construction</a> Construction Leadership Council (2020) <a href="#">Zero avoidable waste in construction</a></p>	National target in the government's <a href="#">Resources and Waste Strategy (2018)</a> to eliminate avoidable waste of all kinds by 2050	With a high number of construction sites for housing developments expected in the plan period, the new Local Plan must help meet target for reducing construction waste to landfill.																																																												
Consumption of water	<p>SEW supply whole borough.</p> <table border="1"> <thead> <tr> <th>TWB</th> <th>KENT</th> <th>ENGLAND &amp; WALES</th> </tr> </thead> <tbody> <tr> <td>158</td> <td>154</td> <td>141</td> </tr> </tbody> </table> <p>litres/household/day 2013-14 data.</p> <p>Sources: KCC (2015) <a href="#">Kent State of the Environment</a></p>	TWB	KENT	ENGLAND & WALES	158	154	141	110 litres per person per day to be the standard for house builders to implement (TWBC, 2017)	TWB consumption rates are higher than the national average and must be reduced.																																																						
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	TWBC (2017) <a href="#">Water Efficiency Background Paper</a>																																												
Demolition and rebuild	In recent years, DM officers have observed an increase in the number of planning applications for demolition and rebuild of existing good quality dwellings.	n/a	This is an unsustainable use of resources and should be discouraged by the new Local Plan.																																										
Energy generation	Removal of government subsidies may bring about a decline in the renewable energy industry. Good opportunities exist in the borough for developing a large biomass industry especially following the recent opening of the Discovery Park biomass burner in east Kent. Community heating schemes provide benefits for energy conservation, fuel poverty and social regeneration. Government subsidies are becoming increasingly available and more and more councils are gaining experience in installing heat networks. This opportunity has not yet been exploited in the borough.  Source: TWBC (2019) <a href="#">Energy Topic Paper for Draft Local Plan</a>	Net zero emissions by 2030	The new Local Plan should support renewable and community energy wherever possible.																																										
Exceedance s of air quality targets for nitrogen dioxide and particulate matter	<table border="1"> <thead> <tr> <th>NO<sub>2</sub></th> <th>Hourly &gt;200µg/m<sup>3</sup></th> <th>Annual &gt;40µg/m<sup>3</sup></th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>0</td> <td>34</td> </tr> <tr> <td>2018</td> <td>0</td> <td>37</td> </tr> <tr> <td>2017</td> <td>0</td> <td>40</td> </tr> <tr> <td>2016</td> <td>0</td> <td>44</td> </tr> <tr> <td>2015</td> <td>0</td> <td>44</td> </tr> <tr> <td><b>Target</b></td> <td><b>18</b></td> <td><b>40</b></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>PM<sub>10</sub></th> <th>Daily &gt;50µg/m<sup>3</sup></th> <th>Annual &gt;40µg/m<sup>3</sup></th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>10</td> <td>21</td> </tr> <tr> <td>2018</td> <td>13</td> <td>27</td> </tr> <tr> <td>2017</td> <td>13</td> <td>24</td> </tr> <tr> <td>2016</td> <td>10</td> <td>26</td> </tr> <tr> <td>2015</td> <td>10</td> <td>27</td> </tr> <tr> <td><b>Target</b></td> <td><b>35</b></td> <td><b>40</b></td> </tr> </tbody> </table> <p>(monitoring station roadside A26) Sources: KentAir (2020) <a href="#">Kent Air Quality</a> TWBC Senior Scientific Officer</p>	NO <sub>2</sub>	Hourly >200µg/m <sup>3</sup>	Annual >40µg/m <sup>3</sup>	2019	0	34	2018	0	37	2017	0	40	2016	0	44	2015	0	44	<b>Target</b>	<b>18</b>	<b>40</b>	PM <sub>10</sub>	Daily >50µg/m <sup>3</sup>	Annual >40µg/m <sup>3</sup>	2019	10	21	2018	13	27	2017	13	24	2016	10	26	2015	10	27	<b>Target</b>	<b>35</b>	<b>40</b>	<p>Air Quality Directive, 2008</p> <p>NO<sub>2</sub>: Not to exceed 200µg/m<sup>3</sup> more than 18 times per year and annual mean of 40µg/m<sup>3</sup></p> <p>Particulates: Not to exceed 50µg/m<sup>3</sup> more than 35 times per year and annual mean of 40µg/m<sup>3</sup></p>	European NO <sub>2</sub> targets are not being met. The Local Plan must support traffic reduction in Tunbridge Wells.
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Features of historical value	<p>Within TWB there are:</p> <ul style="list-style-type: none"> <li>14 Registered Parks and Gardens (with special historic interest) and a further 30 recognised by KCC</li> <li>25 Conservation Areas</li> <li>2,985 Listed Buildings (including 1 building at risk: Providence Chapel, Cranbrook)</li> <li>12 Scheduled Ancient Monuments</li> </ul> <p>The borough is also rich in numerous other heritage assets e.g. monuments, sites of archaeological potential and historic routeways.</p> <p>Sources: TWBC (2018) <a href="#">Historic Environment Review</a> Historic England (2020) <a href="#">National Heritage List</a> Defra (2020) <a href="#">MAGIC Interactive Map</a></p>	TBC	The new Local Plan must protect and/or enhance these features.																																										
Green Belt	7,130 ha of TWB are classified as Green Belt. This is 22% of the area of the borough. The key purpose of this Green Belt land is to prevent encroachment (i.e. purpose 3 of paragraph 80 in the	n/a	The new Local Plan should seek to protect land that makes a strong																																										

Evidence	Data and Trend	Target	Implication																					
	<p>NPPF). 3 Green Belt studies were carried out to inform the level of harm on the Green Belt resulting from the allocations proposed for the new Local Plan.</p> <p>Sources: Tunbridge Wells Borough <a href="#">Green Belt Strategic Study (2016)</a> Tunbridge Wells <a href="#">Green Belt Study Stage Two (2017)</a> Tunbridge Wells Green Belt Study Stage Three (2020)</p>		contribution to the 5 purposes of Green Belt land (see NPPF).																					
Green Infrastructure and trees	<p>Green Infrastructure in the borough needs strengthening. Priority projects are:</p> <ul style="list-style-type: none"> <li>• Applications for new development</li> <li>• Forest Ridge Project</li> <li>• High/Low Weald links</li> <li>• Teise to Medway river links</li> <li>• Romney Marsh Biodiversity Opportunity Area extension</li> <li>• Tourist attraction links</li> <li>• High Weald transition zone</li> <li>• Redundant railways</li> <li>• Surface water management</li> </ul> <p>Source: TWBC (2019) <a href="#">Green Infrastructure Framework for Draft Local Plan</a></p>	n/a	The new Local Plan must support the priority Green Infrastructure projects.																					
Groundwater recharge	<p>The groundwater source protection zones in TBC are:</p> <p>North of Tudeley East of Pembury towards Kippings Cross South of Lamberhurst West of Goudhurst</p> <p>Sources: Defra (2020) <a href="#">MAGIC Interactive Map</a> Tunbridge Wells Borough Council <a href="#">Level 1 Strategic Flood Risk Assessment (SFRA)</a></p>	n/a	<p>Recharge rates are relatively fast for the region.</p> <p>The Local Plan does not need to promote land management practices that encourage faster recharge.</p>																					
Historic Farmsteads	<table border="1" data-bbox="371 1348 970 1534"> <thead> <tr> <th></th> <th>TWB</th> <th>KENT</th> </tr> </thead> <tbody> <tr> <td>Minimal change</td> <td>16%</td> <td>10%</td> </tr> <tr> <td>More than 50% retention</td> <td>46%</td> <td>36%</td> </tr> <tr> <td>Less than 50% retention</td> <td>22%</td> <td>25%</td> </tr> <tr> <td>Farmhouse only</td> <td>10%</td> <td>16%</td> </tr> <tr> <td>Completely lost</td> <td>5%</td> <td>12%</td> </tr> <tr> <td>% Survival</td> <td>84%</td> <td>71%</td> </tr> </tbody> </table> <p>There are 700 farmsteads and 86 out farms or field barns within the borough. Survival rates are higher than the Kent average.</p> <p>Source: Tunbridge Wells Borough Council (2016) <a href="#">Farmsteads Assessment Guidance for Tunbridge Wells Borough</a></p>		TWB	KENT	Minimal change	16%	10%	More than 50% retention	46%	36%	Less than 50% retention	22%	25%	Farmhouse only	10%	16%	Completely lost	5%	12%	% Survival	84%	71%	n/a	The new Local Plan should seek to protect historic farmsteads.
	TWB	KENT																						
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Household waste	<p>In 2018/19 a total of 20825 tonnes of waste was generated, equating to 0.425 tonnes per household.</p> <p>Source: Tunbridge Wells Borough Council Contracts Team (2020)</p>	<p>Reduce 2010/11 household waste per person by 10% by 2020/21 i.e. 397 kg/person (Climate Local Tunbridge</p>	Close to achieving target now. Likely that target will be achieved by 2020/21.																					



Evidence	Data and Trend	Target	Implication
		Wells)	
Household waste diverted from landfill	In 2017/18 46.7% of Kent's household waste was reused, recycled, or composted - working towards the national aim of recycling or composting at least 50% of household waste by 2020/21. In 2018/19 a total of 21020 tonnes was recycled, equating to 0.430 tonnes per household.  Source: Tunbridge Wells Borough Council Contracts Team (2020)	County target for landfill reduction (less than 2% to landfill by 2020/21) 50% recycling rate by 2020 and 65% by 2030 (EU)	Close to target but progress is slow. More work required.
Landscape Character and Quality (historic and existing)	There are 19 Landscape Character Areas in the borough and other valuable landscapes including Important Landscape Approaches, Areas of Landscape Importance, Arcadian Areas and Areas of Important Open Space. The historic landscape is under threat from development.  Source: Tunbridge Wells Borough Council (2017) <a href="#">Landscape Character Assessment</a>	n/a	The new Local Plan must help protect the character of the existing and historic landscape.
Light pollution	Some of the best dark skies in the South East are south of Tunbridge Wells (outside of the Borough).	n/a	The new Local Plan should seek to protect dark skies.
New homes built on previously developed land	2015-2018 59% of new addresses were created on previously developed land. This is slightly higher than the England average of 56%. This proportion is relatively high in Kent, ranking 4 <sup>th</sup> highest.  Sources: OGL (2020) <a href="#">Live tables on land use change statistics</a>  KCC (2019) <a href="#">New residential addresses by previous land use in Kent: 2015 - 2018</a>	n/a	The new Local Plan should support continued development of housing on brownfield land in preference to greenfield.
Number of car club vehicles for hire	5 vehicles are in Tunbridge Wells. Source: Co-Wheels (2020) <a href="#">Electric Vehicles</a>	n/a	Local Plan policies should support the expansion of the car club throughout the borough.
Number of electric vehicle charge points	4 charge points: <ul style="list-style-type: none"> <li>• 1 in The Great Hall car park</li> <li>• 1 in Crescent Road car park</li> <li>• 3 in Jockey Lane car park</li> </ul> Source: Co-Wheels (2020) <a href="#">Locations</a>	n/a	Local Plan policies should support the installations throughout the borough along with other low emission technologies.
Premature deaths from poor air	In 2010, there were 67 premature deaths (per 100,000) as a direct result of the air pollutant PM <sub>2.5</sub> . TWB is the 8 <sup>th</sup> worse district in Kent. Calculations for other pollutants are not available.  Source: Public Health England (2014) <a href="#">Estimating Local Mortality Burdens associated with Particulate Air Pollution</a>	n/a	Poor air quality in the borough is shortening people's lives. The Local Plan must support traffic reduction in Tunbridge Wells.
Priority B lines	Routes for pollinators have been mapped in Kent and Sussex. A key B Line travels through the borough from Maidstone, southwards into the borough and forks into two lines near Goudhurst; one of which travels southeast towards Rolvenden, the other southwest towards Wadhurst.	n/a	To address pollinator declines, the new Local Plan must assist with creation of wildflower rich grassland in the

Evidence	Data and Trend	Target	Implication
	These particular B Lines are also described as being areas where adding new habitat would have the greatest impact on flow from source to target. Source: Buglife (2015) <a href="#">Making a B-Line for Kent and Sussex</a>		location of identified B lines.
Properties at risk from flooding	Most flood risk is from rivers in the catchments of the Rivers Medway, Teise, Beult and Rother. There are also areas at risk from flooding relating to stormwater and groundwater, including Paddock Wood, Five Oak Green and RTW.  Sources: Tunbridge Wells Borough Council (2019) <a href="#">Level 1 Strategic Flood Risk Assessment (SFRA)</a> Tunbridge Wells Borough Council (2019) <a href="#">Level 2 Strategic Flood Risk Assessment (SFRA)</a>	n/a	The new Local Plan must ensure existing properties are not put at further risk of flooding and that risk is reduced wherever possible.
Road Noise	Defra Important Areas for road noise within TWBC: A21 – 5 sections A267 – 2 sections A228 – 6 sections A26 – 7 sections B2162 – 1 section  Sources: Defra (2017) <a href="#">Strategic Noise Mapping dataset</a>	n/a	Development adjacent to these sections of road should be avoided, particularly residential developments or those for sensitive receptors.
Sites of biodiversity value	Within TWB there are: 4 Local Nature Reserves 59 Local Wildlife Sites 17 Sites of Local Nature Conservation value 12 Roadside Nature Reserves  Sources: Tunbridge Wells Borough Council (2020) <a href="#">Natural conservation and wildlife sites</a> Defra (2020) <a href="#">MAGIC Interactive Map</a> KCC (2016) <a href="#">Kent Environment Strategy</a>	60% of LWs to be in positive management for their conservation by 2020 (Kent Environment Strategy)	The new Local Plan must protect and/or enhance all site of ecological value
Sites of geological value	Within TWB there is: 1 Regionally Important Geological Site  Source: Natural England (2020) <a href="#">Designated Sites View, Southborough Pitt SSSI</a>	n/a	The new Local Plan must protect and/or enhance this site of geological value
SSSIs units in favourable or recovering condition	<b>TWB</b> 2019 – 79.22 <b>KENT &amp; SOUTH EAST</b> 2020 – 91.7% <b>ENGLAND</b> 2020 – 91.64% There are 10 SSSIs in TWB. Data is collected by Natural England.  Sources: Natural England (2020) <a href="#">Designated Sites View</a> Tunbridge Wells Borough Council (2019) <a href="#">Authority Monitoring Report 2018/19</a>	95% <b>(England Biodiversity 2020)</b>	TWB lags behind.  Where possible, new Local Plan must support work to improve condition of SSSIs (Natural England is overseeing body).
Water body quality	% of water bodies in the South East (excluding estuaries and coastal) with good or better status for: Ecology – 21%	Various to be achieved by 2021	The new Local Plan must protect and enhance water

Evidence	Data and Trend	Target	Implication								
	<p>Chemical – 99% Groundwater – 52%</p> <p>The most common pressures and the associated sources for not achieving a good status are:</p> <table border="0"> <tr> <td><b>Pressure</b></td> <td><b>Key Sources</b></td> </tr> <tr> <td>Phosphate</td> <td>Water industry      Agriculture and rural land</td> </tr> <tr> <td>Physical modification</td> <td>management Local &amp; central government Agriculture and rural land management</td> </tr> <tr> <td>Dissolved oxygen</td> <td>Water industry Agriculture and rural land management</td> </tr> </table> <p>Ground water quality status in TWB is defined as failing.</p> <p>Source: OGL (2020) <a href="#">River basin management plans: 2015</a></p>	<b>Pressure</b>	<b>Key Sources</b>	Phosphate	Water industry      Agriculture and rural land	Physical modification	management Local & central government Agriculture and rural land management	Dissolved oxygen	Water industry Agriculture and rural land management		bodies that are within or connected to TWB.
<b>Pressure</b>	<b>Key Sources</b>										
Phosphate	Water industry      Agriculture and rural land										
Physical modification	management Local & central government Agriculture and rural land management										
Dissolved oxygen	Water industry Agriculture and rural land management										
Water supply and stress	<p>70% of drinking water supply in Kent is taken from groundwater. This is by far the highest proportion in the UK (next highest proportion in the UK is 50% by Wessex Water).</p> <p>Abstraction pressure in Kent is highest on the River Medway and the greatest ecological pressure is in the north Kent Rivers. No water is available for abstraction in TWB so there is no abstraction pressure.</p> <p>Water transfers take place from Bewl Water reservoir to the south of TWB and Maidstone Borough to the north.</p> <p>The Environment Agency class South East Water as being an area of serious water stress both currently and in all future modelled scenarios.</p> <p>South east England gets 31% less rainfall on average than the rest of the UK.</p> <p>Sources: South East Water (2020) <a href="#">Customer Metering Programme</a> Hydroworks (2020) <a href="#">Knowledge Hub</a></p>	n/a	<p>TWB is in an area of serious water stress.</p> <p>Adopt a policy that enforces the additional technical housing standard for water.</p>								
Wildlife sites of international importance	<p>The Ashdown Forest SAC and SPA are approximately 7km south west of the Borough. 20% of the total area is in favourable condition. 10% of the heathland area is in favourable condition.</p> <p>Source: Ashdown Forest <a href="#">Management Plan in support of Countryside Stewardship 2016-2020</a></p>	Conservation Management Plan contains various targets to improve condition.	The new Local Plan must protect and/or enhance this site following guidance from up to date Habitat Regulations Assessment.								
Woodland Cover	<p>5391 ha of TWB is classified as Ancient Woodland. This is 16% of the area of the borough. TWB has 7215ha of woodland in total. This is 21.8% of the area of the borough.</p> <p>Source: Tunbridge Wells Borough Council (2020) <a href="#">Ancient woodland inventory</a></p>	n/a	The new Local Plan must protect this area.								

## Appendix B - Decision-aiding questions used for scoring SA objectives

Table 141. 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 <sub>2</sub> and PM <sub>10</sub> 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 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) CIHT define desirable walking distances as follows: town centre = 200m commuting/school = 2000m elsewhere = 1200m
	...help reduce premature deaths from poor air quality (cause by PM <sub>2.5</sub> )?	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		Where construction services would be supported on a temporary basis only, no benefit was recorded.

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations
		financial services, 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 flood 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

Appendix B

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations
	opportunities		generally	development sites score 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 without the use of a car. Desirable walking distances (see air quality objective above) 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	HIGH Housing demands	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

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations
		suitable for older people?	are in borough are not being met.	services.
		...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	...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.  Includes a consideration of light pollution
		...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 or 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 resource consumption	...prevent unsustainable demolition and rebuild projects?		The extent to which demolition of existing structurally sound development is required or prevented.
		...Improve use of responsible sourced and low environmental impact		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

Appendix B

Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations
		materials e.g. traditional weatherboarding?		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 generation and disposal	...support continued decline in household waste reduction?		Proposed site allocation unlikely to make a significant difference to this objective.
		...improve rates of household waste diverted from landfill?		Outside the scope of proposed site allocations.



Topic	Objective	Decision-aiding questions: Does the Policy/Plan/Objective?	Weighting	Comments / Limitations
		...reduce construction waste?		Would depend on successful implementation of DM policy and development priorities. In these cases, an unknown score was often applied.
Water	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 C - 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 Draft Local Plan 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 Tudeley Village policy
- Add expectation for improvements to Accessible Natural Greenspace Standards to the expectations for both the Tudeley Village 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 D - 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 E - Cumulative Impact Assessment for Green Belt sites

Table 142. SA scores for allocated sites in the Green Belt including cumulative impact assessment to inform STR 9 Green Belt.

Sustainability Objective	AL/S P 1	AL/P E 1	AL/P E 2	AL/P E 3	AL/P E 4	AL/P E 5	AL/PE 7	AL/R TW 5	AL/RT W 14	AL/RT W 16	AL/RT W 17	AL/R TW 19	STR/S S 1	STR/S S 3	STR 9
Air	0 / -	0	0	0	0 / -	0 / -	0	0 / -	?	0 / -	0	0	?	?	?
Biodiversity	0	-	0 / -	0	0	0	0 / -	0 / -	0 / -	0 / -	-	0	0 / -	0 / -	-
Business	0	0	0	0	0	0 / -	+	0	+ / ?	0	++	0	+ / ++	+	++
Climate	0	? / -	? / -	? / -	? / -	0	? / -	-	0 / -	0 / -	0 / -	0	- / --	-	--
Deprivation	0	0	0	0	0	0	0	0	0 / +	0	0	0	+ / ++	+	++
Education	0 / -	+	+	+	+	+	+	0	+	+	0	0	+ / ++	+ / ++	++
Employment	+	+	+	+	+	+	+ / ++	+	+	++	+++	+	++	++	+++
Equality	-	+	+	+	0 / +	0 / +	+	0	+ / ++	+ / ++	0	+	++	++ / +	++ / +
Health	0	0	0	0	0 / +	0	+ / ++	+	0 / +	0 / +	0	+	++	++	++ / +
Heritage	0	-	-	0 / -	-	0 / -	0	0	0	- / --	0	0	-	--	--
Housing	+	+ / +	+ / +	+ / +	0 / +	0 / +	0	++	?	++	0	0	+++	+++	+++
Land use	-	-	-	-	- / --	0 / +	-	- / --	0 / -	- / --	--	0 / -	-- / --	-- / --	---
Landscape	0 / -	-	-	-	-	0 / -	0 / -	-	0 / -	- / --	-	-	- / --	--	-- / ---
Noise	-	-	-	-	0 / -	0	-	-	- / ?	--	0 / -	0 / -	- / --	- / --	--
Resources	0 / ?	- / ?	- / ?	0 / ?	0 / ?	- / ?	-- / ?	0 / ?	- / ?	0 / ?	0 / ?	0	0 / +	0 / +	0 / +
Services	-	0 / -	0 / -	0 / -	0 / -	0 / -	0 / -	++	++	++	0	+++	++	+++	+ / ++
Travel	0 / -	0	0	0	-	-	0	++	+	+ / ++	0 / +	+	+	++	+
Waste	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	+ + / ?	+ + / ?	?

### **Commentary**

See settlement tables in Appendices F, I, H, R and U 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 addition of 1.1ha of land to the Green Belt (Land West of Colts Hill, close to Badshell Road) is also considered within the cumulative scores. The scale of Policy STR/SS 1 and STR/SS 3 in comparison to the other allocations, dominates this assessment of cumulative effects. Mix scores are assigned for air and water to reflect the wide variety of scores across the sites.

Note. C/B House: Land at Colebrook House, Pembury Rd is not allocated within the Local Plan but will be released from the Green Belt

## Appendix F - Royal Tunbridge Wells

### Scores for Reasonable Sites in Royal Tunbridge Wells (part 1 of 12)

	7	24	30	39
Sustainability Objective	Montacute Gardens, Royal Tunbridge Wells, TN4 8HG	Wyevale 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 / -	-- / ---	-
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. Demolition of these buildings is expected to be necessary.	Air quality score is mixed to reflect fact that development here is likely to increase traffic in the AQMA whilst also presents opportunities to make improvements most likely in the form of contributions that benefit the wider town. Flood zones 2 and 3 present on site are unlikely to prevent development and can be factored into scheme design. 2020 MGB Study: Overall Harm Rating is Low Moderate. The resources objective is informed by the minor impact on Superficial Sub-Alluvial River Terrace deposits.	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, and is in a parcel of Green Belt that would constitute very high harm if released for development. This causes the land use objective to be given a highly negative score.	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.

## Scores for Reasonable Sites in Royal Tunbridge Wells (part 2 of 12)

	53		57	72
Sustainability Objective	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
Business Growth	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 / -
Noise	-	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	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).	This site is highly sustainable. All objectives are neutral or positive except for landscape, land use and 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 use of flood slights would cause some negative impact to dark skies. The 2020 LVIA study also influences landscape score. Health and services score better than most sites in the vicinity due to the proposal for sports use. 2020 MGB Study: Overall Harm Rating is Moderate.	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. Landscape score reflects the significant but, but short-term impacts that will lessen once the woodland to the east matures (2020 LVIA report). 2020 Grassland study found site to have moderate botanical importance and moderate ecological importance. Biodiversity score adjusted. Business growth score reflects the large scale of the site and probability that the business park would support growth of the local economy in key industries. 2020 MGB Study: Overall Harm Rating is Moderate.	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



	53		57		72
Sustainability Objective	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)
					guarantees are given.

Scores for Reasonable Sites in Royal Tunbridge Wells (part 3 of 12)

	73	99	101	100
Sustainability Objective	Land at Pembury Road (south), Tunbridge Wells	Land at Pembury Road, Tunbridge Wells TN2	Colebrook House, Pembury Road, Capel TN11 0QD	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm (including part of Site 30)
Air	-	-	0 / -	0 / -
Biodiversity	0	0	-	0 / -
Business Growth	0	0	+	0
Climate Change	-	-	0 / -	-
Deprivation	0	0	0	0
Education	0 / +	0 / +	0	0
Employment	+	+	+++	+
Equality	0 / +	0 / +	0	0
Health	0 / +	0 / +	0	+
Heritage	-	-	-	0
Housing	+ / ++	+ / ++	0	++
Land use	- / --	-- / ---	--	- / --
Landscape	--	-- / ---	-	-
Noise	0 / -	0 / -	0 / -	-
Resources	0 / ?	0 / ?	+++ / ?	0 / ?
Services & Facilities	++	++	0	++
Travel	+	+	0 / +	++
Waste	0	0	0	0
Water	0	0	0	0
Commentary	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,	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 setting of the AONB and part of a Green Belt parcel of land that	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	This site has a range of strong positive scores. It is let down by the land use score which reflects the loss of greenfield land in the

Appendix F

	73	99	101	100
Sustainability Objective	Land at Pembury Road (south), Tunbridge Wells	Land at Pembury Road, Tunbridge Wells TN2	Colebrook House, Pembury Road, Capel TN11 0QD	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm (including part of Site 30)
	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.	would cause high harm if released. 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.	adjacent site (Policy RTW 17) 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. 2020 Grassland study found site to have low-moderate botanical importance and moderate ecological importance. Biodiversity score adjusted slightly. Business growth score reflects the scale of the site and probability that the business park would support growth of the local economy in key industries. 2020 MGB Study: Overall Harm Rating is Moderate.	Green Belt. 2020 MGB Study: Overall Harm Rating is Low Moderate.

Scores for Reasonable Sites in Royal Tunbridge Wells (part 4 of 12)

	114	116	134	137
Sustainability Objective	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 / +	?	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	+	+	+	+ +
Land use	-- / ---	--	0 / -	- / --
Landscape	0 / -	-- / ---	0 / -	- / --
Noise	0 / -	0 / -	-	- / --
Resources	0 / ?	0 / ?	? / -	0 / ?
Services & Facilities	+ +	+ +	+ +	+ +
Travel	0	+	+ / + +	+ / + +

	114	116	134	137
Sustainability Objective	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
Waste	0	0	0	0
Water	0	0	0	?
Commentary	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.	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.	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.	This site traverses the boundary with Wealden district thus cross boundary impacts have been considered. Negative impacts that have been predicted for the landscape objective apply to the AONB in both constituencies.  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. A negative score is applied 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. The negative land use and landscape scores reflect impact upon the sensitive AONB landscape and the loss of greenfield land which is also Green Belt. Heritage is scored negatively due to the compromised setting of the Hill Fort (a Scheduled Ancient Monument) and loss of assart field. 2020 MGB Study: Overall Harm Rating is Low Moderate.

### Scores for Reasonable Sites in Royal Tunbridge Wells (part 5 of 12)

	140	145	165	175
Sustainability Objective	Knights Park, Tunbridge Wells, TN2 3UW (including 138 and 139)	Turner Pie 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	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 / -	-	-	-

## Appendix F

	140	145	165	175
<b>Sustainability Objective</b>	Knights Park, Tunbridge Wells, TN2 3UW (including 138 and 139)	Turner Pie 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
Resources	0 / ?	?	0 / ?	? / -
Services & Facilities	-	++ / +++	++ / +++	++
Travel	0 / +	+ / ++	+ / ++	+ / ++
Waste	0	0	0	0
Water	0	0	0	0
<b>Commentary</b>	<p>Scores were applied based on an assumption that this site would provide further retail and leisure uses. 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. However, business growth and services objective score negatively to reflect the findings of the Town Centre Uses report that states that future development should be focussed in the centre of the town.</p>	<p>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 loss of employment space on the site. However, it is accepted that the existing business was no longer viable, so this score is only slightly negative.</p>	<p>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 site position, surrounded by the Tunbridge Wells and Rusthall Common a designated Local Wildlife Site. The land use score is influenced by the site 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 site location relative to the A26.</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>

### Scores for Reasonable Sites in Royal Tunbridge Wells (part 6 of 12)

Sustainability Objective	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	0
Climate Change	0	0	0	0 / -	0
Deprivation	0 / +	0 / +	0	0	0
Education	+	+	0 / +	0 / +	0 / +
Employment	+	+	+	+	+
Equality	+ / ++	+ / ++	0	+	0

Sustainability Objective	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
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 a historic field.	A largely sustainable site with loss of greenfield land being the only significant detractor.	This site lies in close proximity to the boundary with Wealden district thus cross boundary impacts have been considered. Negative impacts predicted for the landscape objective apply to the AONB in both constituencies. Likewise, Broadwater Down/The Warren has been taken into account when considered access to open space for the Health Objective. The 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 cannot 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.

Scores for Reasonable Sites in Royal Tunbridge Wells (part 7 of 12)

	237	238	249	250	258
Sustainability Objective	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)	TN2 Centre and adjacent land, Greggs Wood Rd, Sherwood
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 / +	+

## Appendix F

	237	238	249	250	258
<b>Sustainability Objective</b>	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)	TN2 Centre and adjacent land, Greggs Wood Rd, Sherwood
Education	+	+	0 / +	0	0
Employment	+	+	+	+++	+
Equality	+	0 / +	+	+ / ++	+
Health	0	0	0 / +	0	+
Heritage	0	0	?	0	0
Housing	+	+ / ++	+	0	0
Land use	-	-	0	+	+
Landscape	0 / -	0 / -	0	0	-
Noise	-	0 / -	0	0 / -	-
Resources	- / ?	- / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	+	+	++	0 / +	++
Travel	+ / +++	+ / +++	+	+	++ / +++
Waste	0	0	0	0	0
Water	0	0	0	0	0
<b>Commentary</b>	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 transverses the boundary with Wealden district thus cross boundary impacts have been considered.  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 nature of this allocation allows it to score highly for the health objective. Air and transport scores reflect the accessible location. Whilst landscape and biodiversity scores relate to the sensitive adjacent land.

### Scores for Reasonable Sites in Royal Tunbridge Wells (part 8 of 12)

	260	260	262	264	267
<b>Sustainability Objective</b>	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	?	?	?	?	?

	260	260	262	264	267
<b>Sustainability Objective</b>	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
Biodiversity	0	0	-	0	0
Business Growth	0 / +	0 / +	0 / +	0 / +	0
Climate Change	0	0	0 / -	0	-
Deprivation	0	0	0 / +	0 / +	+
Education	+	0	0	0	+
Employment	+ / + +	+ +	+ + +	+ +	+ +
Equality	+ / + +	+ / + +	+ / + +	+ / + +	+ / + +
Health	+	0	0 / +	0	0 / +
Heritage	?	0	--	-	0
Housing	+	0	0	0	+ + / + + +
Land use	+	+	0 / -	+	+ / + +
Landscape	0 / +	0	0 / -	0 / ?	0
Noise	-	0	0 / -	0 / -	-
Resources	? / -	0	? / - - -	?	- - - / ?
Services & Facilities	+ + / + + +	0	+	+ + / + + +	+ + +
Travel	+ / + +	+	+	+	+
Waste	0	0	0	0	0
Water	0	0	0	0 / +	?
<b>Commentary</b>	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 and the provision for a low traffic neighbourhood make the air quality score mixed despite the proximity to the AQMA. The resources objective has a mixed/negative score to reflect the demolition that would be necessary.

## Scores for Reasonable Sites in Royal Tunbridge Wells (part 9 of 12)

	268	328	359	400	411
<b>Sustainability Objective</b>	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
<b>Commentary</b>	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.



## Scores for Reasonable Sites in Royal Tunbridge Wells (part 10 of 12)

	434	SALP AL/RTW 2B	SALP AL/RTW 22	459
Sustainability Objective	Tutty's Farm, Hawkenbury, Royal Tunbridge Wells	Former cinema site, Mount Pleasant Road	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	Land at 202 and 230 Upper Grosvenor Road
Air	?	?	?	0
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 / +	+
Heritage	-	-	-	0
Housing	++	++	++	+
Land use	-- / ---	+	+	-
Landscape	--	0 / +	0 / ?	0
Noise	0	-	-	-
Resources	? / -	0 / ?	+ / ?	-- / ?
Services & Facilities	+ / ++	+++	++ / +++	++
Travel	0 / +	+ / ++	+ / ++	+ / ++
Waste	0	0	0	0
Water	0	0	0	0
Commentary	<p>This site transverses the boundary with Wealden district thus negative impacts that have been predicted for the landscape objective apply to the AONB in both constituencies.</p> <p>This site 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>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>	<p>A largely sustainable site with a range of neutral or slightly positive scores. Strong positives for services and travel reflect the urban location. Noise objective scores negatively to reflect the adjacent railway line.</p>

## Scores for Reasonable Sites in Royal Tunbridge Wells (part 11 of 12)

	SALP AL/RTW 5	SALP AL/RTW 20	DPC 5	137
Sustainability Objective	Land at 36-46 St John's Road	Land at 77 Mount Ephraim (Sturge House, Brockborne House)	Land north of Hawkenbury Road	WHOLE SITE: Land to the west of Eridge Road at Spratsbrook Farm, Royal Tunbridge Wells TN3
Air	?	?	?	-
Biodiversity	0	0	- / - -	-
Business Growth	0 / -	+	0	0
Climate Change	0	0	0 / -	-
Deprivation	0 / +	0	0	0
Education	0 / ?	0	+	+
Employment	+	+++	+	++
Equality	+ / ++	+ / ++	+	+ / ++
Health	0 / +	0 / +	0 / +	0 / +
Heritage	0	0	-	--
Housing	++ / ?	0	++	++
Land use	+	+	-- / - - -	--
Landscape	0 / ?	0 / ?	--	--
Noise	-	-	0	- / - -
Resources	- - - / ?	?	0 / ?	0 / ?
Services & Facilities	++ / +++	++ / +++	+ / ++	++
Travel	+ / ++	+	0 / +	+ / ++
Waste	0	0	0	0
Water	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. 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.	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.	This site 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, loss of an assart field and landscape setting of Tunbridge Wells. The biodiversity score reflects the fact that the entire site is designated as a Local Wildlife Site.	This site traverses the boundary with Wealden district thus cross boundary impacts have been considered. Negative impacts that have been predicted for the landscape objective apply to the AONB in both constituencies.  The scores for this site are mixed and tend to be more extreme versions of those applied to the appraisal of the part site.

Scores for Reasonable Sites in Royal Tunbridge Wells (part 12 of 12)

	SALP AL/RTW 10	SALP AL/RTW 16	EA_195
Sustainability Objective	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 G - Southborough

### Scores for Reasonable Sites in Southborough (part 1 of 2)

	8	10	45	90	232
<b>Sustainability Objective</b>	Whealers Field, Powder Mill Lane	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 Rd (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 / -
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 / +
<b>Commentary</b>	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. The heritage score is let down by a significant portion of the site having archaeological potential.	This is a reasonable 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 and biodiversity as part of the site is a wildflower meadow and 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 (Green Belt location the release of which would cause moderate harm to the Green Belt) and landscape score (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.	This site transverses the boundary with Tonbridge and Malling district thus negative impacts that have been predicted for the objectives consider aspects in the adjacent constituencies e.g. the AONB, Tonbridge AQMA. 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 adverse impacts on the AONB predicted by the 2020 LVIA report has been considered in the Landscape and Heritage scores.	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.

## Scores for Reasonable Sites in Southborough (part 2 of 2)

	233	327	335	441	445	DPC13
Sustainability Objective	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	Land at Baldwins Lane, North Farm Rd, Southborough
Air	0	0	-	-	-	0 / +
Biodiversity	--	0	0	0	0 / -	0
Business Growth	0	0	0	0	++ / +++	0 / -
Climate Change	0	0	0	0 / -	0 / -	0
Deprivation	0	0	0	0	0	+
Education	+	+	+	0 / -	+	+
Employment	+	+	+	+	++	0 / +
Equality	0	0	0 / -	++ / +++	-	+
Health	+	+	+	+	+	+
Heritage	0	0	--	0	++	0
Housing	0 / +	0 / +	+ / ++	++ / +++	+ / ++	+
Land use	0 / -	0 / -	--	0 / -	-	+
Landscape	0 / -	0 / -	--	0 / ?	--	0
Noise	- / --	0 / -	0 / -	-	-	-
Resources	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.	This site has mixed scores. 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 impacted upon. The adverse impacts on the AONB predicted by the 2020 LVIA report have been considered in the Landscape and Land Use scores.	Largely sustainable site. The resources objective is scored to reflect the necessity for demolition. The remaining negative scores are minor and reflect loss of existing business space and noise sensitive location. The urban location means reliance on private car use is not essential for access the wide range of facilities and services.

## Appendix H - Capel

Scores for Reasonable Sites in Capel (part 1 of 3). Nb. Potential sites for a garden settlement are considered in chapter 6.

	11	48	143	216	307
Sustainability Objective	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.

## Scores for Reasonable Sites in Capel (part 2 of 3)

	329	330	331	387	450
Sustainability Objective	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 site 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.

## Scores for Reasonable Sites in Capel (part 3 of 3)

	451	LS_10	LS_12	454	LS_29
Sustainability Objective	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 (including FS_9)	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	++	+	+	- / --	++
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 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. Heritage score affects impact upon the setting of Somerhill House grade 1 listed building.	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 I - Paddock Wood

Scores for Reasonable Sites in Paddock Wood (part 1 of 3). Nb. potential urban extension sites are considered in Chapter 6.

	LS_26	SALP AL/PW4
Sustainability Objective	Park Farm, Queen Street	Land at Mascalls Farm (and additional land at LS_52)
Air	-	0 / -
Biodiversity	-	0 / -
Business	0	0
Climate	? / - -	? / - -
Deprivation	0	0
Education	+	+
Employment	+	+
Equality	-	+
Health	0 / +	+
Heritage	-	-
Housing	++ / +++	++ / +++
Land use	--	--
Landscape	--	- / - -
Noise	0 / -	0 / -
Resources	0 / ?	0 / ?
Services	+	+ / ++
Travel	-	+
Waste	0	0
Water	-	0
Commentary	This is a large site with capacity for significant benefits to the housing objective. The Water score scores negatively to reflect the areas of flood zone 2 and 3 in the north. The travel, air and equality objectives reflect the distance to the town centre and facilities. The narrow shape of the site makes it an inefficient use of land.	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 mean 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. Overall, the development represents a significant change to the setting of the historic landscape. 2020 MGB Study: Overall Harm Rating is Very Low. However, site still represents a large loss of greenfield land.

Scores for Reasonable Sites in Paddock Wood (part 2 of 3). Nb. potential urban extension sites are considered in Chapter 6.

	DPC_6	DPC_8
Sustainability Objective	Land at Mile Oak Road & Knowle Road	Mile Oak Stables, Mile Oak Road, Paddock Wood
Air	-	-
Biodiversity	-	-
Business	0	0
Climate	? / -	? / -
Deprivation	0	0
Education	+	+
Employment	+	+
Equality	-	-
Health	0 / +	0 / +
Heritage	0	0
Housing	+	+
Land use	-	-
Landscape	- / - -	0 / -
Noise	0	0
Resources	0 / ?	0 / ?
Services	+	+
Travel	-	-
Waste	0	0
Water	0	0
Commentary	This remote site scores similarly to adjacent site DPC_8 with a more negative landscape score to reflect AONB setting issues. Ponds on and off site with potential for protected species causes the biodiversity score to be negative. The travel, air and equality objectives reflect the distance to the town centre services and facilities.	This remote site scores similarly to adjacent site DPC_6. Ponds on and off site with potential for protected species causes the biodiversity score to be negative. The travel, air and equality objectives reflect the distance to the town centre services and facilities.

Scores for Reasonable Sites in Paddock Wood (part 3 of 3). Nb. potential urban extension sites are considered in Chapter 6.

	STR/SS 2	DPC_15
Sustainability Objective	Town Centre (including sites 272, 276 and DPC 14)	Greenfields, adjacent to Paddock Wood Parish boundary
Air	+	0
Biodiversity	0	0
Business	++ / +++	0
Climate	? / -	0
Deprivation	+ / ++	0
Education	+	0
Employment	++	0
Equality	+	0
Health	0 / +	0
Heritage	0	0
Housing	0 / +	0 / +
Land use	+	0
Landscape	0 / +	0
Noise	0	0
Resources	?	0
Services	++	0 / -
Travel	++ / +++	0 / -
Waste	0	0
Water	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 been assessed for the use being proposed by the Pre Submission Local Plan for Gypsies and Travellers. The remote nature of the site does not improve travel choice or improve access to or range of services or facilities. However, the relatively modest nature of the proposed use means these aspects are not scored significantly negatively.</p> <p>Likewise, nearby environmental feature such as the historic farmstead at Little Old Hay are unlikely to be impacted on significantly by the Local Plan proposals.</p>

## Appendix J - Cranbrook and Sissinghurst

### Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 1 of 7)

	BK_1	25	29	54
Sustainability Objective	Land at Brick Kiln Farm, Cranbrook	Land to the west of Frythe Way and east of Freight Lane, Cranbrook	Land at Boycourt Orchards, A229 Angley Road, Wisley Pound, Cranbrook TN17 2HR	Land on the east side of Mill Lane, Sissinghurst, TN17 2HX
Air	0 / -	0 / -	-	0
Biodiversity	- / - -	0 / -	0	0
Business Growth	0	0	0	0
Climate Change	? / -	? / -	? / -	0
Deprivation	0	0	0	0
Education	0 / -	+	0 / -	0 / -
Employment	+	+	+	+
Equality	+	0 / +	0 / -	0 / +
Health	0 / +	+	0 / +	0 / +
Heritage	- -	0 / -	0 / -	-
Housing	+ + / + + +	+ +	0 / +	0 / +
Land use	- -	- / - -	- / - -	- / - -
Landscape	-	- / - -	- / - -	-
Noise	-	0	0	0
Resources	- / ?	?	0 / ?	0 / ?
Services & Facilities	0 / -	0	-	-
Travel	-	0 / -	- / - -	0 / -
Waste	0	0	0	0
Water	0 / -	0 / -	0 / +	0
Commentary	Landscape scores are negative to reflect the scale of development being out of keeping with the settlement and impact upon the AONB. Impacts on heritage assets such as historic farmsteads will also be unavoidable. Biodiversity score reflects risk of recreational pressure on the Local Nature Reserve and location of site within the impact risk zone for Robins Wood SSSI. Development at this site will contribute to the already high noise levels and could affect the Important Areas for Road Noise (IARN) at Wisley Green. The large size of the site allows the housing objective to score highly positively. The resources objective is informed by the minor impact on Superficial Sub-Alluvial River Terrace deposits.	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, Land Use and Travel objectives scoring most negatively reflecting loss of greenfield land in the AONB and limited transport options in Sissinghurst. The limited transport options also prompts the air quality objectives to become negative. Development here would risk dilution of the historic settlement character.	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. 2020 Grassland study found site to have low botanical importance and low-moderate ecological importance. Score unchanged. Heritage and landscape scores adjusted to better consider the setting of the rural lane.

## Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 2 of 7)

	110	120	122	125
<b>Sustainability Objective</b>	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	Land adjoining Wilsley Farm, adjacent to Angley Road and Whitewell Lane, Cranbrook, TN17 2LE
Air	0 / +	0	-	0 / -
Biodiversity	0	-	- / - -	0 / -
Business Growth	0 / +	0	0	0
Climate Change	? / -	0	? / -	? / -
Deprivation	? / 0	0	0	0
Education	0 / +	0 / -	0 / -	+
Employment	+	+	+	+
Equality	0	0 / +	0 / -	0
Health	0 / +	0 / +	0 / +	0 / +
Heritage	0 / -	- / - -	0 / -	-
Housing	0 / +	0 / +	+	0 / +
Land use	- - -	- / - -	- / - -	- / - -
Landscape	+	- -	- / - -	-
Noise	0	0	0 / -	0 / -
Resources	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	+	-	-	0 / -
Travel	0 / +	0 / -	- / - -	0 / -
Waste	0	0	0	0
Water	0	0	0	0 / +
<b>Commentary</b>	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. 2020 Grassland study found site to have moderate botanical importance and moderate ecological importance. Score adjusted. Heritage and landscape scores adjusted to better consider the setting of the rural lane and the AONB.	This rural site scores negatively for numerous objectives, particularly in landscape and land use terms and for travel and lack of key services and facilities. Biodiversity also scores negatively to reflect proximity to Robins Wood SSSI. The site is within the impact risk zone and a PRoW brings people into contact with the boundary of the site. Indirect effects are likely.	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.  2020 Grassland study found site to have low-moderate botanical importance and low-moderate ecological importance. Score adjusted slightly.

## Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 3 of 7)

	129	130	131	132	133
<b>Sustainability Objective</b>	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	?	?	?	+	+
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 / +
<b>Commentary</b>	Largely sustainable site with the only negatives being related to the sensitive environmental features such as the rural character of Quaker Lane which would be compromised by development here. Site is reasonably well located for walking or cycling access to services. However, a mixed score is applied for the health objective as it was felt that development could compromise use of the field for sports.	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. However, a mixed score is applied for the health objective as it was felt that development could compromise use of the field for sports.	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. The Landscape Objective also scores negatively as 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. 2020 Grassland study found site to have low botanical importance and low-moderate ecological importance. Score unchanged.

## Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 4 of 7)

	159	188	296	396
<b>Sustainability Objective</b>	Land south of The Street, Sissinghurst (and late site 51)	Land adjacent to Hartley Dyke, Cranbrook	Oak Tree Farm, The Common, Wilsey Pound, Cranbrook	Land West of Freight Lane, Cranbrook
Air	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	+ / ++	0 / -	0 / -	+
Health	0 / +	0 / -	0 / +	0 / +
Heritage	0	- / --	-	0 / -
Housing	+	++	0 / +	+ / ++
Land use	- / --	--	- / --	- / --
Landscape	- / --	-- / ---	0 / -	- / --
Noise	0	-	0	0
Resources	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	-	-	-	0 / -
Travel	0	- / --	- / --	-
Waste	0	0	0	0
Water	0 / +	0	0 / +	0 / -
<b>Commentary</b>	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. 2020 AONB Setting Study showed short term impacts and thus the landscape score has been adjusted accordingly.	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.	Development here would risk dilution of the historic settlement character.  2020 Grassland study found site to have low botanical importance and low ecological importance. Score unchanged.	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.

## Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 5 of 7)

	407	409	430	68	LS_6
<b>Sustainability Objective</b>	Land at Brooksden, High Street, Cranbrook	The High Weald Academy, Angley Road, Cranbrook	Turnden Farm, Hartley Road, Cranbrook	Land at corner of Frittenden Road and Common Rd, Sissinghurst.	Part OS Plot 2429 Common Road, Sissinghurst, Cranbrook
Air	+	0	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
Education	+	?	0 / -	0 / -	0 / -
Employment	?	?	+	+	+
Equality	0	+	+	0	0 / -
Health	0	+	0 / +	0 / +	0
Heritage	0	0	- / - -	0 / -	0 / -
Housing	0 / +	+	++	+	0 / +
Land use	-	+	--	- / - -	- / - -
Landscape	0 / -	0	-- / - - -	-	- / - -
Noise	0	? / 0	-	0	0
Resources	0 / ?	? / -	+ / ?	0 / ?	0 / ?
Services & Facilities	+	0 / -	0 / -	-	- -
Travel	0	0	-	0 / -	0 / -
Waste	0	0	0	0	0
Water	0	0	0 / -	0	0 / ?
<b>Commentary</b>	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. The central location of the site in relation to services and facilities prevents the air and travel objectives from being negative. The scores reflect the relatively small size of this site. It is borderline whether a yield of 10 dwellings could be achieved.	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. 2020 Grassland study found site to have low botanical importance and low-moderate ecological importance. Score adjusted to account for large scale of site. Business growth score has been updated to reflect the fact allocation does not include employment space. 2020 LVIA report and Landscape officer comments state allocation is possible. Score unchanged.	As for all sites in Sissinghurst, this site is let down by accessibility to services and facilities and public transport. Of particular note is the biodiversity score is influenced by the 2020 Grassland study found site to have low-moderate botanical importance and moderate ecological importance. In addition, this site is BAP priority habitat for orchard.	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 which are in turn informed by the loss of a greenfield site and location of site relative to settlement.



## Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 6 of 7)

	LS_30	LS_32	LS_37	FS1
<b>Sustainability Objective</b>	Pinecroft, Frittenden Road, Sissinghurst, TN17 2AQ	Land off of Golford Road, Cranbrook,	Glenn House, Hartley Road, Cranbrook. TN17 3QP	Courtlands, Turnden Road, Hartley, Cranbrook
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	0 / -	+	-	0 / -
Health	0	0 / +	0 / +	0 / +
Heritage	0 / -	0 / -	0	0
Housing	0 / +	++	+	0 / +
Land use	0	--	- / --	-
Landscape	0 / -	---	-	0 / -
Noise	0	0	0 / -	0 / -
Resources	0 / ?	0 / ?	? / -	? / -
Services & Facilities	--	0 / -	-	-
Travel	0 / -	0 / -	- / --	- / --
Waste	0	0	0	0
Water	0 / ?	-	0	0
<b>Commentary</b>	This site scores mostly neutral, with some positive scores. It is let down by accessibility to services and facilities and public transport. In addition, 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. The negative water score reflects adjacent flood zone 3, and the very negative landscape score reflects the recommendation of the 2020 LVIA report not to allocate this site.	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 impact risk zone and rural area and proximity to Ancient Woodland and Biodiversity Opportunity Area further north of the site.	This site scores similar to site LS_37 with adjustments made to some objectives to reflect the smaller scale of this site.

## Scores for Reasonable Sites in Cranbrook and Sissinghurst (part 7 of 7)

	59 / LS_14	292	SC_1	FS8	442
<b>Sustainability Objective</b>	Hartley Parcels (including sites 70, 323, 345 and LS_53)	Land South of Corn Hall, Crane Valley, Cranbrook	Sissinghurst Castle	Land Adjacent to The Barracks, Cranbrook	Land at Frittenden Road, Sissinghurst
Air	-	0	0 / +	-	0
Biodiversity	- / - -	-	+	0 / -	-
Business Growth	+	0	0 / +	0	0
Climate Change	? / -	0	0 / +	0	0
Deprivation	?	0	0	0	0
Education	0 / +	0	0	0 / -	0 / -
Employment	++	+	0	+	+
Equality	0 / -	+	0 / +	0 / -	0
Health	0 / +	0 / +	0	0 / +	0 / +
Heritage	0 / -	-	+	- -	0 / -
Housing	+	+	0	+	+
Land use	- / - -	- / - -	0	- -	-
Landscape	- - / - - -	-	+	- / - -	-
Noise	0 / -	0 / -	0	0	0
Resources	?	0 / ?	0	0 / ?	0 / ?
Services & Facilities	-	0 / -	0 / +	-	0 / -
Travel	- / - -	-	0 / +	- / - -	0 / -
Waste	0	0	0	0	0
Water	0	0	0	0 / +	0
<b>Commentary</b>	This group of sites has positive impacts on some economic and social objectives but it let down by the distance to Cranbrook town centre. 2020 Grassland study found western side of site cluster to have low-moderate botanical importance and moderate ecological importance. Score adjusted slightly. Landscape score downgraded following AONB Units advice to better reflect impact upon the AONB and 2020 LVIA study.	Landscape scores are negative to reflect impact upon the AONB. Impacts on heritage assets will also be unavoidable. Biodiversity score reflects risk of recreational pressure on the Local Nature Reserve and location of site within the impact risk zone for Robins Wood SSSI. Land use score largely reflects loss of greenfield land with likely pockets of best and more versatile soils.	This policy scores largely neutral or positive with specific benefits to tourism, access to heritage assets and improvements to transport modes.	This site scores similar to site 296 with adjustments made to some objectives to reflect the larger scale. The Conservation Area is particularly vulnerable to development at this site and this is reflected in the heritage score.	This site is scored similarly to site 68 with adjustments made to some objectives to reflect the smaller scale.

## Appendix K - Hawkhurst

### Scores for Reasonable Sites in Hawkhurst (part 1 of 7)

	2	17	19	33	52
<b>Sustainability Objective</b>	Chittenden Fields, adjacent to High Street and Slip Mill Road, Hawkhurst	Land adjacent to High Banks Nursery, Cranbrook Road, Gill's Green,	Land at Heartenok 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 / -	-
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
<b>Commentary</b>	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 the key services and facilities and public transport options. Air quality score has been downgraded since draft local plan stage to better reflect high likelihood of private car use.

## Scores for Reasonable Sites in Hawkhurst (part 2 of 7)

	55	86	102	107
<b>Sustainability Objective</b>	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 / -
Biodiversity	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 / -
<b>Commentary</b>	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. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared, and dependency on private car use in this location.	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. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared.	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. 2020 Grassland study found site to have low botanical importance and moderate ecological importance. Biodiversity score adjusted slightly. 2020 LVIA confirms development could take place here without significant adverse effects on the AONB. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared, and dependency on private car use in this location.	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.

## Scores for Reasonable Sites in Hawkhurst (part 3 of 7)

	115	167	201	284
<b>Sustainability Objective</b>	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
Biodiversity	-	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
<b>Commentary</b>	<p>Appraisal assumed site would provide a relief road in additional to new dwellings.</p> <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 very adverse impacts on heritage assets and the character of the AONB (confirmed by 2020 LVIA report). 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 large noise and air benefits to the centre of Hawkhurst by diverting traffic away from the AQMA on Cranbrook Rd. 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. The resources objective is informed by the minor impact on Superficial Sub-Alluvial River Terrace deposits.</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. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared.</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>

## Scores for Reasonable Sites in Hawkhurst (part 4 of 7)

	291	334	350	351	361
<b>Sustainability Objective</b>	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 / -
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
<b>Commentary</b>	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. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared.	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. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared.	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.

## Scores for Reasonable Sites in Hawkhurst (part 5 of 7)

	391	392	394	413
Sustainability Objective	Rear of Limes Grove Oast, Slip Mill Road, Hawkhurst	Trewint Farm and Jacks Paddock, Slip Mill Lane, Hawkhurst (includes site DPC_22).	Land west of Slip Mill Lane at Trewint Farm, Slip Mill Lane, Hawkhurst	Land at Fowlers Park, Hawkhurst
Air	-	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	0
Heritage	0	0	-	-
Housing	0	0 / +	0 / +	+ / ++
Land use	- / --	0 / -	- / --	- / --
Landscape	-	- / --	- / --	-- / ---
Noise	0	0	0	0
Resources	?	? / -	0 / ?	0 / ?
Services & Facilities	0	-	-	0 / -
Travel	- / --	- / --	- / --	-
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.	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. The sensitive edge of settlement location is still likely to cause impacts upon the character of the AONB and the wider historic environment (confirmed by the 2020 LVIA report). The large number of dwellings will also put pressure upon local water resources and may impact upon the AQMA about to be declared. 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.

## Scores for Reasonable Sites in Hawkhurst (part 6 of 7)

	413	422	433	455	SALP AL/HA 1
<b>Sustainability Objective</b>	PART SITE Land at Fowlers Park, Hawkhurst	Santers Yard, Gills Green Farm, Gills Green, Hawkhurst	OS Plot 7007, Cranbrook Road, Hawkhurst	Whitewood Farm, White Lane, Hawkhurst	Site of Former Springfield Nurseries
Air	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	+	+	+	+
Employment	0	++	+	+	+
Equality	0	-	-	+	0
Health	0	0	0	0	0
Heritage	0	0	0	0	0
Housing	0	0 / +	0 / +	+	+
Land use	0	- / - -	- / - -	- / - -	-
Landscape	0	- -	-	-	0 / -
Noise	0	0	0	0	0
Resources	0 / ?	? / +	0 / ?	? / -	? / -
Services & Facilities	0 / +	-	0 / -	0 / -	0 / -
Travel	0	- / - -	0 / -	-	0 / -
Waste	0	0	0	0	0
Water	0	0 / ?	0 / ?	0 / -	0
<b>Commentary</b>	This is a relatively small site and significant impacts are not predicted for any objective. The Services and Facilities objective reflects the benefit that a new, upgraded GP surgery in a central location will bring to the whole community.	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). It is expected that demolition could be avoided demolition makes the resources objective slightly positive. Development of the whole site would have severe impact on the AONB (confirmed by the 2020 LVIA report). 2020 Grassland study found site to have low botanical importance and low-moderate ecological importance. Biodiversity score unchanged.	A site that scores mostly neutral that is let down by lack of key services and facilities and sue to negatives impacts upon the sensitive landscape.	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. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared.	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.



## Scores for Reasonable Sites in Hawkhurst (part 7 of 7)

	LS_3	457	78	SALP AL/HA 5
Sustainability Objective	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
Biodiversity	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 / -	+
Travel	- / --	0 / -	0 / -	0
Waste	0	0	0	0
Water	0 / ?	0	0	0
Commentary	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.	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.	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.  2020 Grassland study found parts of the site to have low-moderate botanical importance and low-moderate ecological importance. Biodiversity score adjusted slightly given scale of site.  Landscape score reflects the findings of the 2020 LVIA report.	A largely neutral site that scores positively for health and services objectives reflecting the opportunity to make improvements to the existing leisure facilities and the provision of an improved GP surgery for the settlement.

## Appendix L - Benenden

### Scores for Reasonable Sites in Benenden (part 1 of 2)

	158	222	277	425	LS_41
Sustainability Objective	Land rear of Greenacres, The Street & adjacent to New Pond Rd (includes site DPC20)	Land on the west side of Iden Green Rd	Feoffee Cottages and Land Walkhurst Rd	Land to the east of Mockbeggar Lane	Land at Benenden Hospital, North of Goddards Green Rd
Air	0 / -	0 / -	0 / -	-	-
Biodiversity	-	0 / -	0 / -	- / - -	- / - -
Business Growth	0	0	0	0	0 / +
Climate Change	? / -	? / -	0	0	? / -
Deprivation	0	0	0	0	0
Education	0	+	+	+	+
Employment	+	+	+	+	+
Equality	0 / +	+	+	-	-
Health	0 / +	0 / +	0	0	0
Heritage	- / - -	- -	-	0	0
Housing	+	+	+	0 / +	+
Land use	- -	- -	- / - -	- / - -	+
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	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 parish.	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.	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 reflects the balance of the risk to the well connected Local Wildlife Site in the south and west, and the benefit that would come from contributions to its long term management. Heritage score reflects risk to the non designated heritage asset.

## Scores for Reasonable Sites in Benenden (part 2 of 2)

	LS_8	LS_16	LS_21	LS_40
Sustainability Objective	Land south of Chapel Lane, Iden Green, Cranbrook	Uphill, New Pond Road, Benenden, Cranbrook	Little Weavers, Iden Green, Benenden, Cranbrook	Land at Benenden Hospital, South of Goddards Green Road (including site 424)
Air	-	0 / -	-	-
Biodiversity	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	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.	Reasonable site. Setting of adjacent Conservation Area needs consideration. Lack of services and facilities is a key issue for all development in this settlement. 2020 grassland study shows this site has moderate-low botanical importance and moderate ecological importance. Score changed from 0 to - to reflect this.	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.	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 neutral overall reflecting the balance of the risk to the relatively isolated Local Wildlife Site, and the benefit that would come from contributions to its long term management. Heritage score reflects risk to the non designated heritage asset.

## Appendix M - Brenchley and Matfield

### Scores for Reasonable Sites in Brenchley and Matfield (part 1 of 5)

	18	34	36
<b>Sustainability Objective</b>	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
Biodiversity	0 / -	0 / -	-
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	0 / +	0 / +	0 / +
Employment	+	+ / ?	+
Equality	0	0	0
Health	0	0	0
Heritage	-	-	0 / -
Housing	+	+	0 / +
Land use	--	--	- / --
Landscape	- / --	- / --	- / --
Noise	0	0	0
Resources	0 / ?	0 / ?	0 / ?
Services & Facilities	- / --	-	- / --
Travel	0 / -	-	0 / -
Waste	0	0	0
Water	0	0	0
<b>Commentary</b>	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. 2020 Grassland study found site to have low-moderate botanical importance and moderate ecological importance. Biodiversity score adjusted slightly.	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 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.

## Scores for Reasonable Sites in Brenchley and Matfield (part 2 of 5)

	76	80	215	220
<b>Sustainability Objective</b>	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
<b>Commentary</b>	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.

## Scores for Reasonable Sites in Brenchley and Matfield (part 3 of 5)

	288	353	393	401	403
<b>Sustainability Objective</b>	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
<b>Commentary</b>	A site that has several neutral scores 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.

## Scores for Reasonable Sites in Brenchley and Matfield (part 4 of 5)

	406	410	414	417
<b>Sustainability Objective</b>	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
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
<b>Commentary</b>	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.

## Scores for Reasonable Sites in Brenchley and Matfield (part 5 of 5)

	LS_7	LS_27	LS_33	LS_46	LS_47
<b>Sustainability Objective</b>	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
<b>Commentary</b>	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 distance, 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 its 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 its location further from services and facilities than some other sites. Negative score for land use is influenced by grade 2 agricultural land.



## Appendix N - Frittenden

### Scores for Reasonable Sites in Frittenden

	349	LS_28
Sustainability Objective	Pound Hill Field, Biddenden Road, Frittenden	Land at Cranbrook Road, Frittenden
Air	0 / -	0 / -
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	0 / -	0 / -
Employment	+	+
Equality	-	-
Health	0	0
Heritage	-	-
Housing	+	+
Land use	-	-
Landscape	0 / -	0 / -
Noise	0	0
Resources	0 / ?	0 / ?
Services & Facilities	-- / ---	-- / ---
Travel	- / --	- / --
Waste	0	0
Water	0 / +	0 / +
Commentary	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 (as for all sites in this parish).	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 O - Goudhurst

### Scores for Reasonable Sites in Goudhurst

	83	124	174	370	415	DPC_3
<b>Sustainability Objective</b>	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	Blantyre House
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	0	0	0	0
Education	0 / -	0 / -	0 / -	0 / -	0 / -	0 / -
Employment	+	+	+	+	+	+
Equality	+ / ?	+ / ?	0	-	-	--
Health	0	0	0	0	0	+
Heritage	0	0	0	0	0 / -	0 / -
Housing	+ / ?	+ / ?	0 / +	0 / +	0 / +	++
Land use	-	-	-	-	-	+
Landscape	-	0 / -	0 / -	- / --	--	0 / -
Noise	0	0	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	--	--	--	--	--	---
Travel	0 / -	0 / -	0 / -	0 / -	0 / -	---
Waste	0	0	0	0	0	0
Water	0	0	0 / +	0 / +	0 / +	0
<b>Commentary</b>	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 a historic settlement.	Reasonable site with many neutral or slightly positive scores. Slight negative scores mostly reflect the dependency on private car use, the sensitive AONB landscape, loss of greenfield land and educational pressure.	Reasonable site with many neutral or slightly positive scores. Slight negative scores mostly reflect the dependency on private car use, the sensitive AONB landscape, loss of greenfield land and educational pressure.	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).	This site is in a very remote location which would encourage use of private cars to reach the nearest services and facilities (which in themselves are limited). The site is outside the AONB but setting issues may need consideration (likewise heritage assets). The brownfield nature of the site enables a positive score for the Land Use objective. The positive health score reflects the suitability of the site for C2 use.

## Appendix P - Horsmonden

### Scores for Reasonable Sites in Horsmonden (part 1 of 3)

	31	82	93	96
<b>Sustainability Objective</b>	Land adjacent to Furnace Lane and Gibbett Lane, 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 / -	-	-
Biodiversity	0	0	0	0
Business Growth	0	0	0	0
Climate Change	0	? / --	0	0
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	+	+	+
Equality	+	+	0 / -	+
Health	0	0	0	0
Heritage	0	-	- / --	- / --
Housing	+	++	+	+
Land use	--	--	-	-
Landscape	0 / -	- / --	- / --	- / --
Noise	0	0	0	0
Resources	0 / ?	0 / ?	0 / ?	0 / ?
Services & Facilities	--	- / --	--	--
Travel	-	-	- / --	- / --
Waste	0	0	0	0
Water	0	0 / -	0	0
<b>Commentary</b>	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.	Scale of this site is out of keeping with the existing settlement and causes negative scores for landscape and heritage especially with regard to short term adverse impacts on the AONB setting. 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 positively 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.

## Scores for Reasonable Sites in Horsmonden (part 2 of 3)

	97	162	207	321	322
<b>Sustainability Objective</b>	Land on the north west side of Maidstone Road and to the south east of Swigs Hole Farm, Horsmonden	Land south of Brenchley Road and west of Fromandez Drive, 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	+	0 / +	+	+	+
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
<b>Commentary</b>	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. The heritage score reflects the impact of the rural character of the settlement pattern and the impact upon a heritage asset.	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. Setting of the adjacent listed building is likely to be affected.	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.

## Scores for Reasonable Sites in Horsmonden (part 3 of 3)

	324	355	377	378	LS_42
<b>Sustainability Objective</b>	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
<b>Commentary</b>	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. There is significant concern about the ability to provide an appropriate means of vehicular access to serve the site.

## Appendix Q – Lamberhurst

### Scores for Reasonable Sites in Lamberhurst (part 1 of 2)

	1	74	170	279	285
<b>Sustainability Objective</b>	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	Land to the West of Spray Hill, 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
Resources	0 / ?	0 / ?	0 / ?	?	?
Services & Facilities	- / - -	- / - -	- / - -	-	- / - -
Travel	-	-	-	-	-
Waste	0	0	0	0	0
Water	0	0	-	0 / +	0
<b>Commentary</b>	Similar to many sites in the parish, this site scores several neutrals with some positive scores. It is let down by a lack of key services and options for public transport. Land use score is slightly better than other sites in the parish to reflect it being partially PDL.	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. The contribution of new development to the noise levels in the adjacent Important Area for Road Noise causes the noise objective to score negatively.	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. The area of flood zone 3 and 2 on site causes the water score to be negative. The contribution of new development to the noise levels in the adjacent Important Area for Road Noise causes the noise objective to score negatively.	Some positive criteria identified including improved access to heritage asset. However, site is not well located for easy access to services and travel options are limited. The services and facilities score is influenced by the slight improvement for tourism possible with this development (links to Scotney Castle).	Similar to many sites in the parish, this site with many largely neutral scores with some slight negative scores mostly reflect dependency on private car use. Landscaping work undertaken in 2020 has confirmed that impacts upon the character of the village and settlement pattern would be adverse. Scores for heritage and landscape objectives reflect this. Groundwater source protection zone also requires consideration.

## Scores for Reasonable Sites in Lamberhurst (part 2 of 2)

	363	423	LS_36	FS3
<b>Sustainability Objective</b>	Land at 36 Brewer Street, Lamberhurst	Lamberhurst Winery, Lamberhurst Down, Lamberhurst	Land at Whisketts Farm, Lamberhurst, TN3 8JG	Heathertye, Mount Pleasant Lane, Lamberhurst (including sites 302, 303 and 363)
Air	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 / +
Employment	+	+	+	+
Equality	0	0	0	0
Health	0	0	0 / +	0
Heritage	0	0 / -	-	-
Housing	+	+ / ++	+ / ++	+ / ++
Land use	0 / -	-	-	-
Landscape	0 / -	- / --	- / --	- / --
Noise	0	0	0 / -	-
Resources	? / -	0 / ?	0 / ?	0 / ?
Services & Facilities	- / --	- / --	- / --	- / --
Travel	-	-	-	-
Waste	0	0	0	0
Water	0	0	0 / +	0 / -
<b>Commentary</b>	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. Land use score is slightly better than other sites in the parish to reflect it being partially PDL.	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. In 2020, consideration was given to whether the site could deliver development in the south eastern section. It was felt that a smaller scale development would not address the issues identified by many of the scores above. Groundwater source protection zone also requires consideration.	This site scores some neutrals and some positive scores. It also scores a number of negatives, which reflect the loss of an historic field in the AONB adjacent to an historic settlement. It's relatively high potential yield potential causes poor air quality, climate change and services/facilities scores which are also influenced by the location of the site relative to the settlement centre and the lack of public transport available.	This site is relatively large and thus prompts a relatively high score for the housing objective. However, development in this location would be out of keeping with the rest of the settlement and thus landscape and heritage objectives score negatively. The contribution of new development to the noise levels in the adjacent Important Area for Road Noise causes the noise objective to score negatively.

## Appendix R - Pembury

### Scores for Reasonable Sites in Pembury (part 1 of 6)

	28	44	50	189
Sustainability Objective	Land at Woodside Road, Pembury TN2 4BG	Land rear of High Street and west of Chalket Lane (including site 67, 369 & LS_5)	50A Hubbles Farm and 32 Hastings Road (including adjacent land), TN2 4JP (including 390)	Land south of Hastings Road, Pembury
Air	0	0	0	0
Biodiversity	0	-	0 / -	0
Business Growth	0	0	0	0
Climate Change	0	? / -	? / -	? / -
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	+	+	+
Equality	0	+	+	+
Health	0	0	0	0
Heritage	0 / -	-	-	0 / -
Housing	0 / +	+ / ++	+ / ++	+ / ++
Land use	- / - -	-	-	-
Landscape	-	-	-	-
Noise	0	-	-	-
Resources	0 / ?	- / ?	- / ?	0 / ?
Services & Facilities	0 / -	0 / -	0 / -	0 / -
Travel	0 / -	0	0	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 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. 2020 Grassland study found site to have moderate botanical importance and moderate ecological importance. Biodiversity score adjusted. 2020 LVIA report findings are used to inform the landscape score. 2020 MGB Study: Overall Harm Rating is Low.	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. 2020 Grassland study found site to have low-moderate botanical importance and low-moderate ecological importance. Biodiversity score adjusted slightly. 2020 LVIA report findings are used to inform the landscape score. 2020 MGB Study: Overall Harm Rating is Low.	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. 2020 Grassland study found site to have low botanical importance and low-moderate ecological importance. Biodiversity score unchanged. 2020 LVIA report findings are used to inform the landscape score. 2020 MGB Study: Overall Harm Rating is Low.



## Scores for Reasonable Sites in Pembury (part 2 of 6)

	190	191	208	241
Sustainability Objective	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 & east of Woodside Rd
Air	0	0	0	0
Biodiversity	0	0	0	0
Business	0	0	0	0
Climate	? / -	? / -	? / -	? / -
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	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 harm) 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.

## Scores for Reasonable Sites in Pembury (part 3 of 6)

	282	290	332	354
Sustainability Objective	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	0	0	0 / ?	0
Climate	? / -	? / -	0	0
Deprivation	0	0	0	0
Education	+	+	+	+
Employment	+	+	+	+
Equality	-	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	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 harm) 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.

## Scores for Reasonable Sites in Pembury (part 4 of 6)

	367	373	375	379
Sustainability Objective	Land to the southwest of Woodside House, Woodside Rd	Land at Downingbury Farm, Pembury	Land at Dowingbury Farm, Rowley Hill	Land at Henwood Green Road & Land at Sturgeons fronting Henwood Green Rd (site 458)
Air	0	0 / -	0 / -	0 / -
Biodiversity	0 / -	0	0	0
Business	0	0 / +	0	0 / -
Climate	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	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. 2020 MGB Study: Overall Harm Rating is Low Moderate.	Green Belt (moderate harm) and greenfield land, with grade 3 soils in the AONB. The heath 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. Air quality scores slightly negatively largely due to the distance to local facilities and good local road network meaning private car use will be preferred.

## Scores for Reasonable Sites in Pembury (part 5 of 6)

	458	444
Sustainability Objective	Land at Sturgeons fronting Henwood Green Rd (site 458)	Land north of Tunbridge Wells Hospital, Tonbridge Rd
Air	0 / -	-
Biodiversity	0	-
Business Growth	0 / -	+ / + +
Climate Change	0	? / -
Deprivation	0	0 / +
Education	+	+
Employment	+	+ +
Equality	0 / +	+
Health	0	+
Heritage	0 / -	-
Housing	0 / +	+
Land use	0 / +	- / - -
Landscape	0 / -	- -
Noise	0	-
Resources	- / ?	?
Services & Facilities	0 / -	0 / -
Travel	-	0 / -
Waste	0	0
Water	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. 2020 MGB Study: Overall Harm Rating is Very Low.	This site has been appraised for development as medical facilities including education and key worker housing. 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 site could 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. Development here poses 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.

## Scores for Reasonable Sites in Pembury (part 6 of 6)

	64	136	395	LS_13	460
Sustainability Objective	Land at Woodside House, Woodside Road TN2 4BG	Land at Notcutts Garden Centre TN2 4QN	Woodsgate Corner, Pembury	Owlsnest Wood, Tonbridge Road	Cornford Court, Cornford Lane
Air	0	0	0	0 / -	0
Biodiversity	0	0	0 / -	-	0 / -
Business Growth	0	0	+	+	+
Climate Change	0	? / -	? / -	? / -	? / -
Deprivation	0	0	0	0 / +	0
Education	+	+	+	0	+
Employment	+	+	+ / + +	+ / + +	+ / + +
Equality	0	0 / +	+	+	+
Health	0	0	++	+ / + +	+ / + +
Heritage	0 / -	0	0	0	0
Housing	0 / +	0 / +	0	0	0
Land use	- / - -	0 / -	0 / -	0 / -	-
Landscape	--	0	0 / -	0 / -	0 / -
Noise	0	-	-	-	-
Resources	? / -	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 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.	This site scores reasonably well with mostly neutral scores. The roadside location causes the noise objective to score negatively. The land use objective is neutral and influenced by the brownfield location. There are no significant positive or negative scores.	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 greenfield land, with grade 3 soils in the AONB. Noise scores negatively because of exposure to high noise levels and also the contribution to a deterioration in existing levels. Health scores positively to reflect need for C2 uses across the borough.	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 greenfield land. The health objective scores positively to reflect the benefits that will be seen from improving hospital facilities. The nature of the proposed use 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 slightly negatively. The proposals pose a risk to the nearby designated wildlife sites. However, buffers and schemes for enhancements will reduce biodiversity impacts.	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 (low harm) greenfield land, with grade 3 soils in the AONB. Noise scores negatively because of exposure to high noise levels and also the contribution to a deterioration in existing levels. There are also slight risks to existing landscape and biodiversity due to being within the AONB and adjacent to woodland. However, utilising the existing development on site lessens this risk. Resources score is influenced by the demolition of a building.

## Appendix S - Rusthall

### Scores for Reasonable Sites in Rusthall

	22	60	SALP AL/RTW 9	146
Sustainability Objective	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	-	- / - -
Business Growth	0	0	0	0
Climate Change	0	0	0	-
Deprivation	0	0	0	0
Education	0 / +	0 / +	0 / +	0 / -
Employment	+	+	0	+
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	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.	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.	This site is largely sustainable scoring a number of neutral and positive scores. 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. Business and employment scores reflect loss of current use as a car dealership. Land use scores positively to reflect the brownfield site and the positive services and facilities score reflects proximity to RTW.	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.

## Appendix T - Sandhurst

### Scores for Reasonable Sites in Sandhurst (part 1 of 2)

	DPC_12	153	227 and 149	227 and 149
Sustainability Objective	Sharps Hill Farm, Queen Street, Sandhurst	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	- / - -	0 / -
Housing	0 / +	0 / +	+	0 / +
Land use	0 / -	-	-	-
Landscape	0 / -	- -	- -	0 / -
Noise	0	0	0	0
Resources	- - / ?	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. The AONB, Conservation Area, listed building and non-designated heritage asset (Sharps Hill Oast) are likely to experience a slight negative impact. It is expected that this could be overcome with sensitive design.	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. Risk to the AONB and nearby heritage assets (historic farmstead and Windmill) is low and expected to be overcome with sensitive design.

## Scores for Reasonable Sites in Sandhurst (part 2 of 2)

	299	320	LS_11	LS_50	FS2
Sustainability Objective	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	Field to the south of Bodiam Road, Sandhurst
Air	-	0 / -	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	+	+	+	+	+
Employment	+	+	?	+	+
Equality	0	0	0	0	0
Health	0	0	0	0	0
Heritage	- / - -	- -	0	- -	-
Housing	++	+	0 / +	0 / +	0 / +
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 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 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.	Site scores similarly to others in the parish for some objectives. However, landscape impacts are particularly negative reflecting the loss of the soft green backdrop to the settlement that this site would create. The setting of the listed farmhouse would also be impacted and causes a negative heritage score.



## Appendix U - Speldhurst

### Scores for Reasonable Sites in Speldhurst (part 1 of 3)

	27	42	94	231
<b>Sustainability Objective</b>	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 / -
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	+	+	+	0 / +
Land use	- -	-	-	-
Landscape	0 / -	0 / -	-	0 / -
Noise	0	- / - -	-	-
Resources	0 / ?	0 / ?	0 / -	0 / ?
Services & Facilities	-	-	-	-
Travel	-	0 / -	-	0 / -
Waste	0	0	0	0
Water	0	0	0	0 / +
<b>Commentary</b>	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.	This site has several neutral and single negative 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. Equality, air and travel scores were downgraded in Pre-Submission version of SA to reflect confirmation of this difficulty for active travel.	There are no significant negative scores for this site. The site is in a sensitive, edge of settlement location within the AONB. However, the scale is in keeping with the existing settlement and sensitive design will ensure impacts are reduced. 2020 Grassland study confirms site has low botanical and ecological importance so biodiversity impacts are not expected to be significant. The education objective scores slightly negative because the existing primary school 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. Noise scores negatively because the site is within the main flight path for Gatwick airport.

## Scores for Reasonable Sites in Speldhurst (part 2 of 3)

	239	337	338	386
<b>Sustainability Objective</b>	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 -	-
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	-	-	- / - -
Health	0 / +	0	0	0
Heritage	0	0	- -	0
Housing	0	+	++	+
Land use	0 / -	- / - -	- - / - - -	-
Landscape	-	-	- -	-
Noise	0	0	- -	-
Resources	0	? / -	0 / ?	0 / -
Services & Facilities	0 / +	0 / -	-	-
Travel	0	-	0 / -	0 / -
Waste	0	0	0	0
Water	0	0	0	0
<b>Commentary</b>	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 negative to reflect the fact that flood lighting would 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. Equality, air and travel scores were downgraded in Pre Submissions version of SA to reflect confirmation of this difficulty for active travel.	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.

## Scores for Reasonable Sites in Speldhurst (part 3 of 3)

	416	LS_15	FS_10	LS_39
Sustainability Objective	Land North of Langton House, Langton Green	Herons Oast Farm, Speldhurst Road, Langton Green, Tunbridge Wells	Land at Hollands Farm, Speldhurst	Dragonfly Farm, Langton Road, Speldhurst TN3 0NR
Air	0 / -	0 / -	0 / -	0 / -
Biodiversity	--	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	-	-	-	-
Health	0	0	0	0
Heritage	--	- / --	- / --	0
Housing	++	++	++ / +++	+
Land use	--	--	-- / ---	- / --
Landscape	--	- / --	--	0 / -
Noise	-	-	-	-
Resources	? / -	? / -	? / -	? / -
Services & Facilities	-	-	-	-
Travel	0 / -	0 / -	0 / -	0 / -
Waste	0	0	0	0
Water	0 / ?	0 / ?	0 / ?	0 / +
Commentary	<p>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 impact upon the AONB. There is a large Local Wildlife Site on the majority of the site which greatly reduce development potential. The site adjoins and risks impacting upon the setting of the Conservation Area.</p>	<p>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).</p>	<p>This relatively large site is in a sensitive edge of settlement location and consequently is assigned some highly negative scores. The majority of the site is in the AONB and the entire site is within the Green Belt, the release of which would have a high impact. Development here would risk impact upon the setting of nearby heritage assets.</p>	<p>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.</p>

