

Tunbridge Wells Borough Local Plan



Sustainability Appraisal Issues and Options Report

Final Report

May 2019

Document History

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

Sustainability Appraisal Scoping Report (Stage A)

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

Sustainability Appraisal (Stage B)

| Date | Title | Content | |
|----------------------------|--|---|--|
| May 2017 | Sustainability Appraisal Assessment Report Issues and Options Stage Consultation Draft | Issue for consultation alongside Local Plan Issues and Options Report | Was published for consultation for the period from 2 May to 12 June 2017 |
| December 2017 and May 2019 | Sustainability Appraisal Assessment Report Issues and Options Stage Final Report | Updated following consultation with statutory bodies and other interested parties, and consideration of new studies. Latest update includes minor changes. | This report. |

Non Technical Summary

This report summarises how sustainability has been considered at the Issues and Options stage for the preparation of a new Local Plan for the borough.

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

Testing the Local Plan objectives against the sustainability appraisal framework

A compatibility test was undertaken to determine how well the 8 draft strategic objectives of the emerging Local Plan match the 19 sustainability objectives previously determined as appropriate for this borough (see <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>).

The key finding from this test was that the majority of Local Plan strategic objectives were compatible with the sustainability objectives.

Developing the Local Plan options including reasonable alternatives

To provide advice on this topic, the various growth options presented by the Issues and Options Local Plan report were tested against a sustainability objective scoring system. An alternative, in which no plan is implemented, was also tested.

Evaluating the likely significant effects of the Local Plan alternatives

The sustainability scores for each growth strategy option were analysed and compared alongside a written commentary. It was found that all the options had a range of advantages and disadvantages. However, once suggestions for mitigating adverse effects and maximising benefits were considered (in order to help remove the influence of unknown issues), all growth strategies became dominated by positive scores.

Overall, the 'no plan' option was determined to be the least favourable option and the 'garden village' option was determined to be the most favourable option. Because the 'garden village' option would be unable to provide for the full housing needs of the borough, it was suggested that an approach that combines the principles of the other strategies could be adopted. On this basis and to ensure the best outcome possible across sustainability objectives, it was recommended that the 'garden village' option be combined with an additional scaled-down version of the 'A21 growth corridor' option, which was the second best scoring strategy overall.

Considering ways of mitigating adverse effects and maximising beneficial effects

Numerous options for improving the outcome of both the objectives and the various growth options were recommended. These included providing clarity about whether the Local Plan's Transport Objective could include reference to sustainable travel. As explained above, implementation of all the recommendations resulted in improved compatibility of objectives and largely positive scores for all planned growth options.

Proposing measures to monitor the significant effects of implementing the Local Plan

Sources of information that can be used to monitor the significant effects of the Local Plan were presented and included statistical bulletins and mapping analyses. Monitoring information will be updated as the Local Plan progresses to the next stage and the exact effects become clearer.

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1 Introduction

1.1 Local Plan background

- 1.1.1 The new Local Plan currently being prepared by Tunbridge Wells Borough Council (TWBC) is intended to set out the policies and plans to guide the future development of the borough in the period up to 2033. It will identify the scale of development and also the key locations that will be used to meet this need.
- 1.1.2 The new Local Plan will provide:
- a spatial vision for the borough and strategic objectives to achieve that vision
 - a development strategy to provide:
 - a framework for the allocation of sites for specific uses (for example, housing and business use)
 - the context for designating areas where specific policies will apply, either encouraging development to meet economic and/or social objectives or constraining development in the interests of environmental protection
 - Site-specific allocations and policies for development of identified sites
- 1.1.3 The main objectives of the new Local Plan are to meet development needs, protect and enhance the environment, deliver sufficient infrastructure, provide high quality housing, provide for economic growth, ensure adequate leisure and recreational facilities, deliver sustainable development, and deliver adequate transport and parking capacity.
- 1.1.4 The new Local Plan will replace the following policy documents in current use:
- Tunbridge Wells Borough local Plan saved policies (June 2006)
 - Tunbridge Wells Borough Core Strategy DPD (June 2010)
 - Tunbridge Wells Borough Site Allocations Local Plan (July 2016)
- 1.1.5 The new Local Plan has sustainability implications for the entire borough. The economic, environmental and social characteristics of the borough are described in the Sustainability Appraisal Scoping report (see <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>) and also the Local Plan Issues and Options 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).

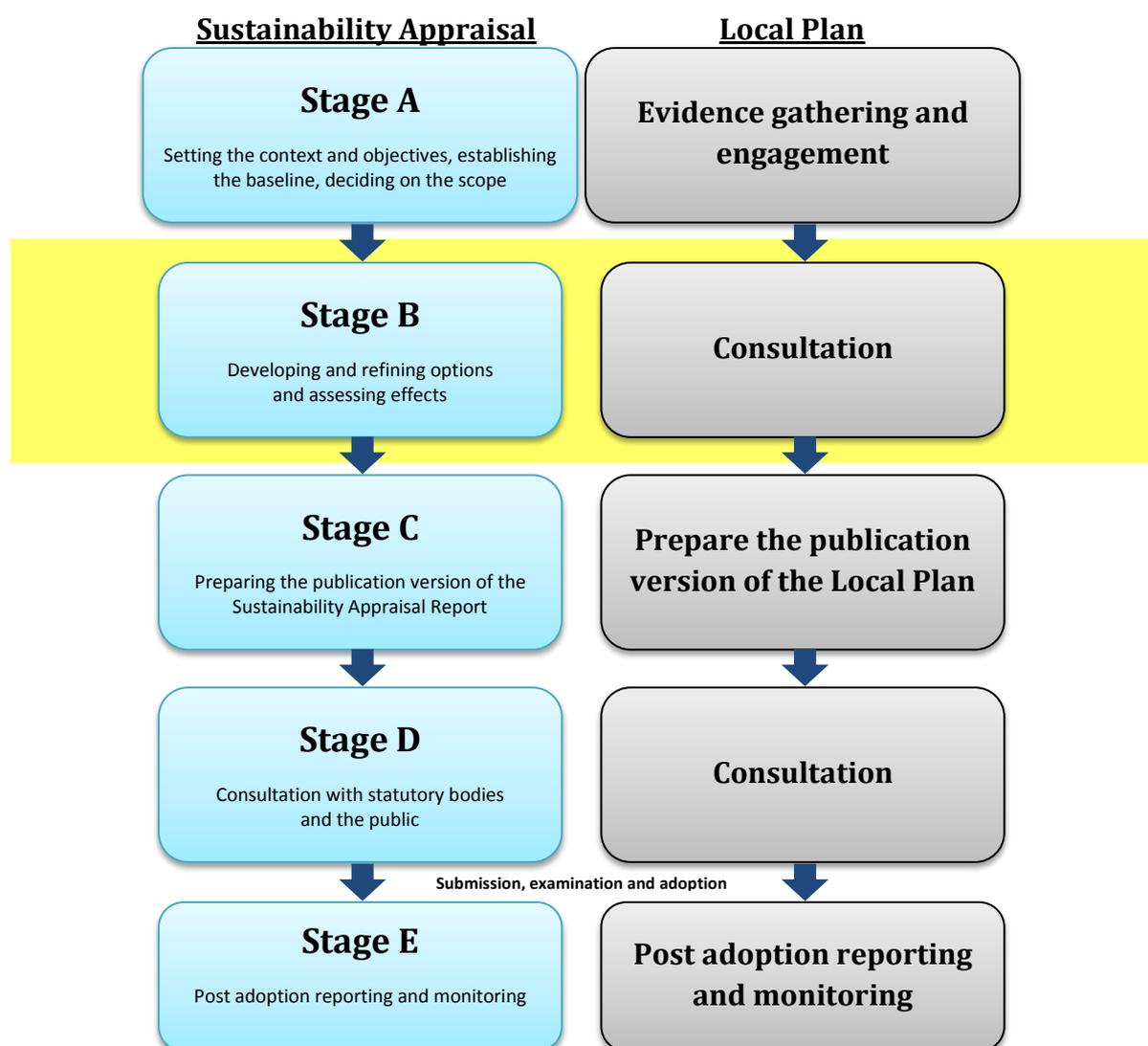


Figure 1. Key stages of Local Plan preparation and the relationship with the sustainability appraisal process. Adapted from Planning Practice Guidance Reference 11-013-20140306. **Yellow highlight** indicates current stage of work.

1.3 Purpose of this Report

- 1.3.1 Stage A of the sustainability appraisal process was undertaken in 2015-16 and resulted in the production of a Scoping Report that was consulted on in June 2016. The report was then updated to take into account consultees' comments and a final version prepared in October 2016. The Stage A Scoping Report should be referred to for a description of the baseline, relevant plans, policies and programmes and the justification for the sustainability objectives that are being implemented in this Issues and Options Sustainability Appraisal report.
- 1.3.2 This report represents Stage B of the process and should be read in conjunction with the SA Scoping Report available at <http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>). Stage B is divided into five further sub-processes (see Figure 2).

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

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

- 1.3.3 The outcomes of these five sub-processes are described in Chapters 4, 5 and 6 of this report, and a reminder of which sub-process is being addressed is shown in the margin next to each chapter.
- 1.3.4 It should be noted that this report only applies the Stage B process to the draft growth strategy options and plan objectives as outlined in the Local Plan Issues and Options document. A further iteration of the Stage B process will be applied to the allocation of sites and policies for development as they are developed. This work will be presented in the Stage C report to accompany the draft Local Plan (see Figure 1).
- 1.3.5 A formal report is not a requirement for Stage B (see Figure 1). However, a report for consultation was prepared nevertheless as it was felt to be a useful interim presentation of the application of the SA scoring methodology and a good opportunity for relevant organisations to provide opinions following the initial scoping stage and prior to the scoring being extensively applied to sites and policies. This report also provides a record of how alternatives are being assessed and the Local Plan is being shaped before production of the final document. Section 7.2 details how the results of the consultation exercise have been taken into account.

The Stage B sub-processes are shown within the margins

2 Legal Compliance

2.1 The SEA Directive

2.1.1 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.

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 (this report) Draft Local Plan Sustainability Appraisal (future 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 (this report). Section 1.1 |
| The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme. | Scoping Report (2016) Section 3.4 Issues and Options Sustainability Appraisal (this report). Section 4.2 |
| The environment characteristics of areas likely to be significantly affected | Scoping Report (2016) Appendix E Issues and Options Sustainability Appraisal (this report). Chapters 4 and 5 |
| 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). | Scoping Report (2016) Section 4.4 and Appendix E |
| The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation. | Scoping Report (2016) Chapter 2 |

| SEA Regulations Requirements | Relevant Report |
|--|---|
| <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 (this report). Chapters 4 and 5</p> <p>Draft Local Plan Sustainability Appraisal (future report)</p> |
| <p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p> | <p>Issues and Options Sustainability Appraisal (this report). Chapter 5</p> <p>Draft Local Plan Sustainability Appraisal (future report)</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>Draft Local Plan Sustainability Appraisal (future report)</p> |
| <p>A description of measures envisaged concerning monitoring in accordance with regulation 17.</p> | <p>Issues and Options Sustainability Appraisal (this report). Chapter 6</p> <p>Draft Local Plan Sustainability Appraisal (future report)</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 (this report). Non Technical Summary</p> <p>Draft Local Plan Sustainability Appraisal (future report)</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 (this report). Chapter 7</p> <p>Draft Local Plan Sustainability Appraisal (future report)</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"> - the plan or programme adopted - the environmental report - a statement summarising: <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: <ul style="list-style-type: none"> (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. | <p>Adoption statement (future report)</p> |
| <p>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 (this report). Chapter 6</p> <p>Draft Local Plan Sustainability Appraisal (future report)</p> |

3 Methodology

3.1 Sustainability Objectives

3.1.1 At scoping stage, 19 sustainability objectives were identified. These are summarised in Table 2.

Table 2. Sustainability Objectives for Tunbridge Wells Borough

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

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

- water consumption rates
- risk of flooding
- ability to managing impacts from flooding
- groundwater quality
- pressure on water ecology

3.1.3 See Appendix A for a description of all indicators for each objective.

3.2 Scoring method

3.2.1 To provide an indication of how well a policy, strategy or allocation contributes to each of the indicators for the sustainability objectives, a score was chosen from an eight point scale of impact as shown below.

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

- 3.2.2 Where the scores across the various key indicators or decision-aiding questions vary, an overall score is determined using the following process:
- An equal number of positive, negative and neutral scores without weightings would score neutral overall or an appropriate combined score¹
 - 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.
- 3.2.3 Indicator weightings and scores for decision-aiding questions can be seen in Appendix B. In general, higher weightings were given to issues that were legislatively driven, of critical importance to the borough and where finite assets were concerned. This shows the scoring for Growth Strategy 1 as an example of how overall scores were applied.
- 3.2.4 Once an overall score for each objective was determined, a scoring summary table was provided that summarises the scoring across all objectives and, importantly, provides a written commentary on the overall impressions of the policy, strategy or allocation, including recommendations and potential improvements.
- 3.2.5 Also, it should be noted that no assumptions were made about mitigation being put in place prior to a score being applied. The only exception to this was where a policy is sufficiently advanced so as to include a specific requirement for mitigation. This is not the case at Issues and Options stage. At this stage, potential mitigation options are discussed in the description once scores were applied.

¹ 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.

- 3.2.6 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 allocation. 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.

3.3 Updates to Baseline Data

- 3.3.1 As explained in the Stage A Scoping Report, the Sustainability Appraisal is a dynamic process that is continuously adapted or updated as more data or evidence becomes available.
- 3.3.2 Below is a list of information that has yet to be made available for consideration at scoping stage. As these studies become available, they will be reviewed and, where appropriate, the SA approach will be adapted. Any change to scores already undertaken for this report, will be reported on in the Stage C Sustainability Appraisal Report (see Figure 1 in Section 1.2).

Table 3. Evidence that has yet to be incorporated into Sustainability Appraisal work.

| Evidence | Source | Expected Date for Completion |
|--------------------------------------|--|--|
| Ecological Studies | KMBRC | Spring 2017 |
| Green Belt Capacity Review | External consultant commissioned by TWBC | Spring/Summer 2017 |
| Gypsy and Traveller Needs Assessment | External consultant commissioned by TWBC | End 2017 |
| Heritage Strategy | TWBC Conservation Team | Spring 2018 |
| Historic Landscape Characterisation | External consultant commissioned by TWBC | Summer 2017 |
| Historic Environment Review | External consultant commissioned by TWBC | Summer 2017 |
| Housing Needs Survey | External consultant commissioned by TWBC | End 2017 |
| Infrastructure Development Plan | TWBC Policy Team | Spring 2018 |
| Landscape Capacity Study (RTW) | External consultant commissioned by TWBC | Spring 2017 |
| Landscape Character Assessment | External consultant commissioned by TWBC | Spring 2017 |
| Neighbourhood Plans | External consultants commissioned by parish councils | At various stages throughout borough. Hawkhurst’s expected to be “made” by Autumn 2017 |
| Open Space/Recreation Study | External consultant commissioned by TWBC | End 2017 |
| Playing Fields/Pitch Strategy | External consultant commissioned by TWBC | Summer 2017 |
| Retail Study | External consultant commissioned by TWBC | Spring 2017 |
| Settlement Role and Function Study | Internal assessment by TWBC | Spring 2017 |
| Strategic Flood Risk Assessment | External consultant | Summer 2017 |

| Evidence | Source | Expected Date for Completion |
|--|---|-------------------------------------|
| | commissioned by TWBC | |
| Strategic Housing and Economic Land Availability Assessment (SHELAA) | TWBC Policy Team | Spring 2017 (interim study only) |
| Urban tree canopy data mapping | Forestry Commission national programme | Spring 2017 |
| Viability Assessment | External consultants commissioned by TWBC | Spring 2018 |

4 Sustainability Appraisal

4.1 Local Plan Strategic Objectives

Stage B1

4.1.1 There are eight Strategic Objectives guiding the new Local Plan. These are shown in Figure 3 as follows:

1. **Meeting development needs:** to provide sufficient, developable and deliverable land for a mix of uses in order to meet the borough's Local Plan development requirements to 2033.
2. **The borough's distinctive environment:** all new development will seek to protect and enhance both the natural and built environment to ensure that its special character is maintained.
3. **Delivering sufficient infrastructure:** to ensure the provision of existing and future sufficient infrastructure to support the delivery of new development.
4. **To provide high quality housing:** to deliver the Local Plan's housing requirements, to include a range of housing types to meet local needs.
5. **Provision of economic growth:** to deliver the Local Plan's economic requirements in relation to employment and retail growth in order to deliver jobs and long term economic prosperity.
6. **Ensuring adequate leisure and recreational facilities:** ensuring the provision of high quality sports, recreation, community and cultural facilities that are accessible to all the borough's residents.
7. **Delivering sustainable development:** taking into account the economic, social and environmental impacts of all new development in light of local circumstances and opportunities
8. **Delivering adequate transport and parking capacity:** in order to fulfil the transport needs of the borough and its residents and businesses, and provide easy access to services and facilities.

Figure 3. Strategic objectives of the new Local Plan.

4.1.2 As the objectives are strategic and, in their nature, not detailed, it was felt that a compatibility test would be the most useful way of assessing whether the Local Plan objectives are in line with the objectives of the SA. This approach was felt to be more useful than the detailed scoring assessments presented in section 4.2 as, at this stage, detailed scores would invariably be made up of many unknowns. The compatibility testing approach has also been used at Scoping Stage.

4.1.3 When testing these objectives the following assumptions were made:

- Local Plan Objective 1 “Meeting Development Needs” includes green open spaces, and not only built development
- Local Plan Objective 7 “Delivering Sustainable development” mirrors the Sustainability Appraisal’s expectations of what constitutes sustainable development

4.1.4 The outcome of the compatibility testing is show below in Table 4.

Table 4. Compatibility testing of Local Plan objectives with Sustainability Appraisal objectives.

| | | SUSTAINABILITY APPRAISAL OBJECTIVES | | | | | | | | | | | | | | | | | | | |
|-----------------------|----------------|-------------------------------------|--------------|-----------------|-------------------------|-------------|-----------|------------|----------|--------------------|----------|---------|----------|-----------|-------|-----------|-----------------------|--------|-------|-------|---|
| | | Air | Biodiversity | Business Growth | Climate Change & Energy | Deprivation | Education | Employment | Equality | Health & Wellbeing | Heritage | Housing | Land Use | Landscape | Noise | Resources | Services & Facilities | Travel | Waste | Water | |
| | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | |
| LOCAL PLAN OBJECTIVES | Dev. Needs | 1 | X | X | ✓ | X | ✓ | ✓ | ✓ | ✓ | ? | ✓ | X | X | ? | X | ✓ | ✓ | X | X | |
| | Environment | 2 | ? | ✓ | ? | ✓ | / | ? | / | ✓ | ✓ | ? | ✓ | ✓ | ? | ✓ | / | ? | ✓ | ✓ | |
| | Infrastructure | 3 | ? | ? | ✓ | ? | ✓ | ✓ | ✓ | ? | ? | ✓ | ? | ? | ? | ? | ✓ | ? | / | ? | |
| | Housing | 4 | X | X | ? | X | ✓ | ✓ | ✓ | / | ? | ? | ✓ | X | X | ? | X | ? | ? | ? | X |
| | Economic | 5 | X | ? | ✓ | ? | ✓ | ? | ✓ | ? | / | ? | ? | X | ? | ? | X | ✓ | ? | ? | ? |
| | Leisure | 6 | ? | / | / | ? | / | / | ? | ✓ | ✓ | ✓ | ? | ? | ? | ? | / | ✓ | ✓ | / | ✓ |
| | Sustainable | 7 | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Transport | 8 | X | ? | ✓ | X | ? | ? | ✓ | ? | ? | ? | ? | ? | ? | ? | / | ✓ | ✓ | / | / |

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 |

4.1.5 To better analyse trends, Table 4 is then summarised according to the number of compatible sustainability objectives (see Table 5) and vice versa according to the number of compatible Local Plan objectives (see Table 6).

Table 5. Number of sustainability objectives that are compatible with Local Plan objectives. Row colour indicates where there are more compatible objectives than incompatible (green) or vice versa (pink).

| Local Plan Objective | | Number of Sustainability Objectives | | | |
|----------------------|-----------------------------------|-------------------------------------|--------------|--------------------|-----------------|
| | | Compatible | Incompatible | Mixed or uncertain | No relationship |
| 1 | Meet development needs | 9 | 8 | 2 | 0 |
| 2 | Protect and enhance environment | 9 | 0 | 7 | 3 |
| 3 | Deliver sufficient infrastructure | 7 | 0 | 11 | 1 |
| 4 | Deliver housing needs | 4 | 7 | 7 | 1 |
| 5 | Provide for economic growth | 4 | 3 | 11 | 1 |
| 6 | Provide leisure and recreation | 6 | 0 | 7 | 6 |
| 7 | Deliver sustainable development | 19 | 0 | 0 | 0 |
| 8 | Adequate transport and parking | 4 | 2 | 10 | 3 |

4.1.6 Table 5 above shows that the majority (seven out of eight) of the Local Plan Objectives are more compatible than incompatible with the Sustainability Appraisal objectives. There is one Local Plan objective that is more incompatible than compatible with the Sustainability objectives. This is Objective 4 to deliver high quality housing that meets local needs.

Table 6. 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 an equal number of compatible and incompatible objectives.

| Sustainability Objective | | Number of Local Plan Objectives | | | |
|--------------------------|-------------------------|---------------------------------|--------------|--------------------|-----------------|
| | | Compatible | Incompatible | Mixed or uncertain | No relationship |
| 1 | Air | 1 | 4 | 3 | 0 |
| 2 | Biodiversity | 2 | 2 | 3 | 1 |
| 3 | Business Growth | 5 | 0 | 2 | 1 |
| 4 | Climate Change & Energy | 2 | 3 | 3 | 0 |
| 5 | Deprivation | 5 | 0 | 2 | 1 |
| 6 | Education | 4 | 0 | 2 | 2 |
| 7 | Employment | 6 | 0 | 2 | 0 |
| 8 | Equality | 4 | 0 | 2 | 2 |
| 9 | Health & Wellbeing | 4 | 0 | 3 | 1 |
| 10 | Heritage | 3 | 0 | 5 | 0 |
| 11 | Housing | 4 | 0 | 4 | 0 |
| 12 | Land Use | 2 | 3 | 3 | 0 |
| 13 | Landscape | 2 | 2 | 4 | 0 |

| Sustainability Objective | | Number of Local Plan Objectives | | | |
|--------------------------|-----------------------|---------------------------------|--------------|--------------------|-----------------|
| | | Compatible | Incompatible | Mixed or uncertain | No relationship |
| 14 | Noise | 1 | 0 | 7 | 0 |
| 15 | Resources | 2 | 3 | 1 | 2 |
| 16 | Services & Facilities | 6 | 0 | 1 | 1 |
| 17 | Travel | 4 | 0 | 4 | 0 |
| 18 | Waste | 2 | 1 | 2 | 3 |
| 19 | Water | 3 | 2 | 1 | 2 |

4.1.7 Similarly, as can be seen from Table 6 above, the majority (13 out of 19) of the sustainability objectives are more compatible than incompatible with the Local Plan objectives. There are two sustainability objectives that are equally incompatible and compatible with the Local Plan objectives. These are sustainability objective numbers 2 (biodiversity) and 13 (landscape). Finally, there are four sustainability objectives that are more incompatible than compatible with the Local Plan objectives. These are objectives 1 (air), 4 (climate change and energy), 12 (land use) and 15 (resources).

4.1.8 The majority of uncertainty in scoring was created by the lack of detail about locations for development, e.g. business growth.

4.1.9 Recommendations for improving the Local Plan objectives are discussed in section 5.1.

Stage B2 4.2 Likely significant effects of the Growth Strategy Options

4.2.1 The Local Plan Issues and Options document has proposed the following five growth strategy options:

- (1) Focused Growth
- (2) Semi-Dispersed Growth
- (3) Dispersed Growth
- (4) Growth-Corridor Led Approach
- (5) New Settlement Growth

4.2.2 In addition, the Sustainability Appraisal has gone further by assessing the following alternatives to the above growth options:

- (6) Business As Usual Approach (No Local Plan)

- 4.2.3 Summary tables of the appraisals for each of the above six options follow in the proceeding pages. Before studying the appraisals, it should be noted that the following assumptions were made before scores were applied and commentary prepared.
- a) There would be no significant difference in growth distribution between Growth Options 1 - 3. All three options direct the majority of development to Royal Tunbridge Wells and Southborough.
 - b) For Growth Option 5, the new settlement would be located separately from existing settlements and in a location with existing sustainable transport options (or sustainable transport options will be provided as part of the development).
 - c) New schools would be built to accommodate both new and existing demands.
 - d) New development would bring about opportunities to improve deprivation.
 - e) There would be no net loss of existing publically accessible green space².
 - g) Any change to flood risk as a result of implementing Growth Strategy 4 would be accounted for and mitigated.
 - h) As explained in paragraph 3.2.5, no assumptions about mitigation have been made at this stage.

² This definition of 'green space' is intended to consider only the publically accessible space that could help promote physical activity and the health agenda. Existing habitats, countryside and greenfield sites are not considered in this assumption.

| OPTION 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. | | | | | | | | | |
| Sustainability Objective | | Score | | | | | | | |
| Number | Topic | ? | --- | -- | - | 0 | + | ++ | +++ |
| 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 & Facilities | | | | | | | ✓ | |
| 17 | Travel | | | | | | ✓ | | |
| 18 | Waste | ✓ | | | | | | | |
| 19 | Water | | | | ✓ | | | | |

Summary and Recommendations

This strategy was assessed and adopted by the Borough Council for the last plan period and thus predicting impacts can be carried out with greater accuracy than the other strategies.

The strategy concentrates development around Royal Tunbridge Wells and Southborough and thus exacerbates some of the existing problems in these areas (e.g. air quality).

Because losses for biodiversity are likely, it is recommended that biodiversity mitigation schemes be devised.

High housing demands put economic floor space at risk. A policy would be needed to prevent economic floor space being lost in preference for housing especially in well located employment sites.

It is also recommended that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into the affordability criteria for new homes.

New schools or school expansions should be provided to meet both current and future demands.

Without detail on the exact location for development, it is difficult to score the ancient woodland and GI aspects of the Landscape objective. Scores are based on an assumption that there would be no net loss of GI and ancient woodland would be afforded strong protection.

Waste and resources would be considered through DM policy so are not scored.

See Appendix B for full scoring assessment.

| OPTION 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. | | | | | | | | | |
| Sustainability Objective | | Score | | | | | | | |
| Number | Topic | ? | --- | -- | - | 0 | + | ++ | +++ |
| 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 & Facilities | | | | ✓ | | | | |
| 17 | Travel | | | | ✓ | | | | |
| 18 | Waste | ✓ | | | | | | | |
| 19 | Water | | | | ✓ | | | | |
| Summary and Recommendations | | | | | | | | | |
| <p>This strategy concentrates development around Royal Tunbridge Wells and Southborough and thus exacerbates some of the existing problems in these areas (e.g. air quality).</p> <p>If development in villages was coupled with improvements to local services and active transport infrastructure, a benefit may be seen.</p> <p>Because losses for biodiversity are likely, it is recommended that biodiversity mitigation schemes be devised.</p> <p>High housing demands put economic floor space at risk. A policy would be needed to prevent economic floor space being lost in preference for housing especially in well located employment sites.</p> <p>It is also recommended that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into the affordability criteria for new homes.</p> <p>New schools or school expansions should be provided to meet both current and future demands.</p> <p>Without detail on the exact location for development, it is difficult to score the ancient woodland and GI aspects of the Landscape objective. Scores are based on an assumption that there would be no net loss of GI and ancient woodland would be afforded strong protection.</p> <p>Waste and resources would be considered through DM policy so are not scored.</p> <p>Full scoring assessment available upon request.</p> | | | | | | | | | |

| OPTION 3: DISPERSED GROWTH | | | | | | | | | |
|---|-----------------------|-------|-----|----|---|---|---|----|-----|
| Development distribution proportional across all the borough's settlements. | | | | | | | | | |
| Sustainability Objective | | Score | | | | | | | |
| Number | Topic | ? | --- | -- | - | 0 | + | ++ | +++ |
| 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 & Facilities | | | ✓ | | | | | |
| 17 | Travel | | | ✓ | | | | | |
| 18 | Waste | ✓ | | | | | | | |
| 19 | Water | | | | ✓ | | | | |

Summary and Recommendations

This strategy concentrates development around Royal Tunbridge Wells and Southborough and thus exacerbates some of the existing problems in these areas (e.g. air quality).

Because losses for biodiversity are likely, it is recommended that biodiversity mitigation schemes be devised.

High housing demands put economic floor space at risk. A policy would be needed to prevent economic floor space being lost in preference for housing especially in well located employment sites.

It is also recommended that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into the affordability criteria for new homes.

New schools or school expansions should be provided to meet both current and future demands.

Without detail on the exact location for development, it is difficult to score the ancient woodland and GI aspects of the Landscape objective. Scores are based on an assumption that there would be no net loss of GI and ancient woodland would be afforded strong protection.

Waste and resources would be considered through DM policy so are not scored.

Full scoring assessment available upon request.

| OPTION 4: GROWTH CORRIDOR-LED APPROACH | | | | | | | | | |
|--|-----------------------|-------|-----|----|---|---|---|----|-----|
| Development distribution focused around the A21, close to Royal Tunbridge Wells and Pembury, as a new 'growth corridor'. | | | | | | | | | |
| Sustainability Objective | | Score | | | | | | | |
| Number | Topic | ? | --- | -- | - | 0 | + | ++ | +++ |
| 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 & Facilities | | | | | | ✓ | | |
| 17 | Travel | | | | | | ✓ | | |
| 18 | Waste | ✓ | | | | | | | |
| 19 | Water | | | | | | ✓ | | |

Summary and Recommendations

This strategy directs a significant amount of development to an area of the borough near the main towns that is currently undergoing transport improvements.

It is recommended that sensitive receptors are kept away from the A21 roadside and that an air quality monitoring study is commissioned to determine appropriate locations for sensitive receptors. Likewise, for noise impacts, it is recommended that sensitive receptors are kept outside of the Impact Area for Road Noise (IARN).

Because losses for biodiversity are likely, it is recommended that biodiversity mitigation schemes be devised.

It is recommended that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into the affordability criteria for new homes.

It is also recommended that new schools or school expansions be provided to meet both current and future demands.

Without detail on the exact location for development, it is difficult to score the ancient woodland and GI aspects of the Landscape objective. Scores are based on an assumption that there would be no net loss of GI and ancient woodland would be afforded strong protection. However, the score remains negative as the A21 corridor is largely within the High Weald AONB.

Waste and resources would be considered through DM policy so are not scored.

Care must be taken if proposing a significant amount of retail just outside of the main town centres as this could have a detrimental impact on town centre trade.

Full scoring assessment available upon request.

| OPTION 5: NEW SETTLEMENT GROWTH | | | | | | | | | |
|---|-----------------------|--------------|------------|-----------|----------|----------|----------|-----------|------------|
| New freestanding 'Garden Village' settlement. There is no location identified with this option. A new settlement could be located anywhere within the borough. | | | | | | | | | |
| Sustainability Objective | | Score | | | | | | | |
| Number | Topic | ? | --- | -- | - | 0 | + | ++ | +++ |
| 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 & Facilities | | | | | | | | ✓ |
| 17 | Travel | | | | | | | ✓ | |
| 18 | Waste | ✓ | | | | | | | |
| 19 | Water | ✓ | | | | | | | |
| Summary and Recommendations | | | | | | | | | |
| <p>This strategy would be accompanied by comprehensive master planning and would allow for provision of suitable economic floor space and support the growth of new businesses. Similarly, pockets of health deprivation are widely distributed across the borough so this score could be improved with careful design.</p> <p>Concentrating a large quantity of development in one location brings about constraints such as loss of greenfield land. However, there are some benefits too, e.g. drawing development pressures away from sensitive locations (assuming a less sensitive location is chosen).</p> <p>Developing further away from RTW is recommended to reduce the draw of the town and thus help to prevent a worsening of existing poor air quality. The extent of this negativity could be improved or worsened depending on the exact location of the new settlement.</p> <p>The heritage environment would need careful consideration before a final location is chosen and the setting of any asset would need sympathetic design at an early stage.</p> <p>It is recommended that the location chosen avoids all environmental constraints as far as possible. In addition, it is advised that the settlement is positioned outside of the Green Belt. In terms of landscape, building a new settlement from scratch provides the opportunity to develop a unified character and sense of place. It is advised that the settlement is positioned in an area where existing landscape character could be enhanced and the AONB is unaffected.</p> <p>There is a high risk that such large amount of growth would create significant movements in new locations and thus warrant a new Important Area for Road Noise (IARN). It is hoped that this effect can be lessened with careful design.</p> <p>Waste and resources would be considered through DM policy so are not scored. Likewise, it is recommended that policy is developed to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into affordability criteria for new homes.</p> <p>Full scoring assessment available upon request.</p> | | | | | | | | | |

| OPTION 6: BUSINESS AS USUAL (NO LOCAL PLAN) | | | | | | | | | |
|--|-----------------------|--------------|------------|-----------|----------|----------|----------|-----------|------------|
| This scenario is an alternative to the previous growth strategies in which no planned growth takes place. Only windfall sites provide for the development needs of the borough and thus not all needs may be met. | | | | | | | | | |
| Sustainability Objective | | Score | | | | | | | |
| Number | Topic | ? | --- | -- | - | 0 | + | ++ | +++ |
| 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 & Facilities | ✓ | | | | | | | |
| 17 | Travel | ✓ | | | | | | | |
| 18 | Waste | | | ✓ | | | | | |
| 19 | Water | ✓ | | | | | | | |

Summary and Recommendations

Several negative scores are created by not directing development at a strategic level, e.g. difficulty in accounting for cumulative impacts from piecemeal development in certain topics such as noise and air.

In addition, a lack of strategic planning and strong policy direction makes achieving targets in topics such as resources and water conservation much less likely.

The lack of information about development type and location makes some scores difficult to apply, e.g. growth and support for certain industries, provision of employment opportunities in key wards, improvements to health deprivation and access to services and facilities.

Full scoring assessment available upon request.

- 4.2.4 See section 5.2 for a discussion of the implications of these assessments and recommendations for improvement.
- 4.2.5 It should be noted that it may be appropriate to appraise a further, 7th strategy, at a later date in which the borough's growth targets are only partially achieved. At this Issues and Options stage, it was assumed that the targets could be met by finding enough suitable and available land.
- 4.2.6 It was not deemed appropriate to appraise an option in which neighbouring authorities take some of the growth required in the Borough in the form of either discrete sites or a joint garden village as neighbouring authorities do not have capacity and thus the option would not be deliverable.

5 Conclusions and Recommendations

5.1 Local Plan Objectives

5.1.1 With regard to the compatibility testing in Section 4.1, there are several reasons for the incompatibilities shown in Table 5 and Table 6. These relate largely to the lack of guarantee that is provided for protection and conservation of environmental features such as biodiversity, landscape, resources and water, and also the difficulty of meeting development needs while simultaneously reducing energy use and improving air quality.

5.1.2 To improve compatibility of objectives, the following recommendations are made:

- Improve Local Plan Objective 1 by including reference to meeting development needs with consideration of the constraints in the borough and providing sufficient land for a mix of appropriate uses. Also, clarify whether development needs includes the non-built environment (in the context of Local Plan Objective 6)
- Improve Local Plan Objective 2 by removing wording “*seek to*” protect so sentence reads as simply “*to protect and enhance*”
- Improve Local Plan Objective 4 by making reference to meeting needs within the context of a constrained borough
- Improve Local Plan Objective 6 by making reference to making improvements to the health and wellbeing of residents
- Improve Local Plan Objective 8 by including reference to sustainable and active transport methods

5.1.3 If all the above recommendations were implemented, the compatibility of Local Plan Objectives 1 (meet development needs) and 4 (deliver housing needs) could be improved. Likewise, the compatibility of Sustainability Objectives 1 (air), 2 (biodiversity), 4 (climate change and energy), 9 (health and wellbeing), 10 (land use), 11 (landscape) and 17 (travel) could be improved.

5.2 Growth Strategy Options

Stage B3

5.2.1 With regard to the scores for each of the growth strategies in section 4.2, see Table 7 below for a summary of the outcomes and to allow easy comparison across the six options.

Table 7. Comparison of scores for growth strategy options

| Sustainability Objective | | Growth Strategy Option | | | | | |
|--------------------------|-------------------------|------------------------|-----|-----|-----|-----|---------|
| | | GS1 | GS2 | GS3 | GS4 | GS5 | No Plan |
| 1 | Air | -- | -- | - | - | ? | -- |
| 2 | Biodiversity | - | - | - | - | - | -- |
| 3 | Business Growth | 0 | + | + | +++ | +++ | ? |
| 4 | Climate Change & Energy | - | -- | -- | - | 0 | --- |
| 5 | Deprivation | ++ | ++ | + | + | -- | -- |
| 6 | Education | 0 | 0 | 0 | 0 | - | --- |
| 7 | Employment | ++ | ++ | + | +++ | ? | ? |
| 8 | Equality | +++ | +++ | ++ | + | --- | ? |
| 9 | Health | + | + | + | 0 | - | ? |
| 10 | Heritage | - | - | + | 0 | + | -- |
| 11 | Housing | + | ++ | ++ | + | ++ | + |
| 12 | Land use | -- | --- | --- | --- | --- | -- |
| 13 | Landscape | - | -- | -- | -- | ? | -- |
| 14 | Noise | -- | -- | - | - | - | -- |
| 15 | Resources | ? | ? | ? | ? | ? | -- |
| 16 | Services & facilities | ++ | - | -- | + | +++ | ? |
| 17 | Travel | + | - | -- | + | ++ | ? |
| 18 | Waste | ? | ? | ? | ? | ? | -- |
| 19 | Water | - | - | - | + | ? | ? |

5.2.2 Table 7 shows that each of the five growth strategies has both positive and negative elements. It is also clear that the 'Business as Usual (No Plan)' alternative is far less favourable overall with a large number of negative and unknown/mixed impacts. For this reason, the 'Business as Usual (No Plan)' alternative has been discounted from hereon.

5.2.3 For reasons explained in paragraph 3.2.6, it would be unwise to sum the positives and negatives to determine an overall score for each strategy. However, the following general observations can be made when comparing the five 'planned' growth strategies:

- No difference in scores is seen for the biodiversity objective. All strategies are scored negatively. This is because the new Local Plan is proposing to meet the needs of a relatively large quantity of development across the borough, brownfield sites are limited and some development is almost certainly going to fall within the Ashdown Forest buffer zone.
- No difference in scores is seen for the waste and resources objectives. All strategies are scored as unknown for each of these objectives because improvements depend heavily on appropriate new policy, as aspect not considered at strategic level.

- All strategies score varying degrees of positivity for the housing objective. This is because housing demands in the borough are currently very high and all the strategies will attempt to meet these demands.
- All strategies score varying degrees of negativity for the land use objective. This is because to meet development needs, it is highly likely that greenfield and/or Green Belt land would need to be considered for release.
- All strategies score varying degrees of negativity for the noise objective. This is because meeting development needs is highly likely to increase road traffic in the important Areas for Road Noise across the borough.
- A large difference in scores is seen across the strategies for the deprivation and equality objectives (from + + + to - - -). This is because a positive score for these objectives depends on regeneration of the pockets of deprivation in the borough, and the strategies direct development towards these pockets in varying degrees.
- A large difference in scores is seen across the strategies for the services and facilities objective (from + + + to - -). This is because there is a wide difference in provision between urban and rural areas, and the strategies direct development to the rural areas in varying degrees.
- A large difference in scores is seen across the strategies for the travel objective (from + + + to - -). This is because access to train stations is difficult in rural areas and rural areas promote a heavy reliance on private car use. The strategies direct development to the rural areas in varying degrees.

5.2.4 Mitigation of adverse effects for each strategy would be possible as follows:

Stage B4

Growth Strategy 1:

- Turn business growth objective positive by implementing a policy to prevent loss of economic floor space in preference for housing.
- Introduce policy for resource conservation and waste management to help turn the resources and waste objective positive.
- Introduce the government's higher optional technical standard for water conservation to help turn the water objective score become more positive.

Growth Strategy 2:

- As for Growth Strategy 1 and ensure development in rural locations is accompanied by improvements to services, facilities and transport to turn the services and facilities, and travel objectives positive.

Growth Strategy 3:

- As for GS2 except that the services and facilities objective and travel objective may turn more positive but still remain negative or neutral overall.

Growth Strategy 4:

- As for GS1 and ensure sensitive receptors are kept a safe distance away from the A21 roadside and IARN may help turn the air and noise objectives more positive but still remain neutral overall.

Growth Strategy 5:

- Help turn the health and deprivation objectives positive by ensuring the settlement is positioned in a location that can achieve Accessible Natural Greenspace Standard and where a pocket of deprivation can benefit.
- Turn the air objective positive by positioning the settlement in a location that draws traffic away from the AQMA.
- Improve the noise objective through careful design and consideration of the settlement location.
- Improve the landscape objective by choosing a location well outside of the AONB³.
- Improve the water objective by choosing a location inside Flood Zone 1 that eliminates impacts from flooding.
- Introduce policy for resource conservation and waste management to help turn the resources and waste objective positive.
- Turn the employment objective positive by choosing a settlement location that would provide employment opportunities for key wards.

5.2.5 Maximising the beneficial effects for each strategy would be possible as follows:

Growth Strategy 4:

- Introduce the government's higher optional technical standard for water conservation to help turn the water objective score become even more positive.

Growth Strategies 1 – 4:

³ It should be noted that if a location outside the AONB is not found for a garden village, the scoring for the landscape objective is extremely likely to be negative, with the extent of negativity dependent on the exact location within the AONB.

- Deprivation objective can be made more positive by implementing a policy to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into the affordability criteria for new homes.

Growth Strategies 2 – 3:

- Improve the business growth objective by implementing a policy to prevent loss of economic floor space in preference for housing.

5.2.6 Carrying out the suggested mitigation of adverse effects and maximisation of beneficial effects provides the improvements to scores shown in Table 8.

Table 8 Improvements to scores originally presented in Table 7 by mitigating adverse effects (green) and maximising beneficial effects (blue). A shaded cell shows where a score has been improved.

| Sustainability Objective | | Growth Strategy Option | | | | |
|--------------------------|-------------------------|------------------------|-----|-----|-----|-----|
| | | GS1 | GS2 | GS3 | GS4 | GS5 |
| 1 | Air | -- | -- | - | 0 | + |
| 2 | Biodiversity | - | - | - | - | - |
| 3 | Business Growth | + | ++ | ++ | +++ | +++ |
| 4 | Climate Change & Energy | - | -- | -- | - | 0 |
| 5 | Deprivation | +++ | +++ | ++ | ++ | + |
| 6 | Education | 0 | 0 | 0 | 0 | - |
| 7 | Employment | ++ | ++ | + | +++ | ++ |
| 8 | Equality | +++ | +++ | ++ | + | --- |
| 9 | Health | + | + | + | 0 | + |
| 10 | Heritage | - | - | + | 0 | + |
| 11 | Housing | + | ++ | ++ | + | ++ |
| 12 | Land use | -- | --- | --- | --- | --- |
| 13 | Landscape | - | -- | -- | -- | + |
| 14 | Noise | -- | -- | - | + | + |
| 15 | Resources | + | + | + | + | + |
| 16 | Services & facilities | ++ | + | -/0 | + | +++ |
| 17 | Travel | + | + | -/0 | + | ++ |
| 18 | Waste | + | + | + | + | + |
| 19 | Water | 0 | 0 | 0 | ++ | + |

5.2.7 It can be seen that these improvements ensure that all strategies are dominated by positive scores and no objectives are now scored as unknown or mixed. In this simplistic sense, the most preferred option with the highest number of positive scores and lowest number of negative scores becomes Growth Strategy 5, and the least preferred option becomes

Growth Strategy 3.

- 5.2.8 However, it is unlikely that Growth Strategy 5 would be able to provide for the full housing needs of the borough; thus an approach that combines the principles of other strategies could be adopted. Should this be considered, the remaining negative impacts resulting from Growth Strategy 5 could be addressed. At present, the objectives of biodiversity, education, equality and land use still score negatively for Growth Strategy 5. While the scores for biodiversity and land use remain negative across Growth Strategy Options 1-4, those for education and equality could be improved by adopting an additional scaled-down version of Growth Strategy 4 (the second best strategy).
- 5.2.9 Many objectives within Growth Strategies 1-3 have similar outcomes, with Growth Strategy 3 being slightly less favourable overall. However, scores related to Travel and Services do vary across the 3 strategies reflecting poorer access to facilities and transport options in the more rural settlements.

5.3 Recommendations for new Local Plan

- 5.3.1 As result of the sustainability appraisal work undertaken at Issues and Options stage, various recommendations have been made. These are summarised as follows:
- Adjust the wording of the eight Local Plan Objectives as suggested in paragraph 5.1.2
 - Follow all suggestions for mitigating the adverse effects detailed in paragraph 5.2.4
 - Following all suggestions for maximising the beneficial effects detailed in paragraph 5.2.5
 - Assuming the above recommendations are implemented, consider further investigation of Growth Strategy 5, with elements of Growth Strategy 4 making up any shortfall in development needs. This recommendation assumes appropriate phasing over the plan period so that housing targets can be achieved in the short term (e.g. <5 years) and medium term (e.g. 5-15 years). However, it is pertinent to note that this recommendation is subject to locational constraints.

6 Monitoring Effects

6.1 Need for monitoring

- 6.1.1 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.
- 6.1.2 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.

6.2 Proposed measures for monitoring

- 6.2.1 The SA report accompanying the Publication draft Local Plan will include a comprehensive set of monitoring indicators to measure and evaluate the progress towards the goals or improvements against the challenges identified in the Local Plan. The SA will identify those strategic indicators which will enable TWBC and stakeholders to assess whether the overall sustainability aims and objectives of the draft Local Plan are being delivered.
- 6.2.2 For the purpose of derivation of the sustainable indicators for the draft Local Plan monitoring sustainability indicators will be analysed from the following sources:

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

- KCC Business Intelligence Publications including aspects of population, poverty, housing, economy and employment (broken down into borough level data).
- Internal TWBC monitoring including the five-year housing land supply and a review of planning applications within or near to environmental constraints.
- Various additional sources already listed within Appendix B of the Stage A Scoping Report, which can be viewed here:
<http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>

- 6.2.3 This list can be refined as the Local Plan process progresses and preferred options are chosen.

7 Consultation

7.1 Invitation to Comment

7.1.1 , this Sustainability Appraisal has been sent to Natural England, Historic England and the Environment Agency with instruction to respond within the defined consultation period (2 May to 12 June 2017).

7.1.2 In addition, the following local organisations and authorities have been invited to comment:

- All town and parish councils in the borough
- Ashford Borough Council
- 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
- Lewes District Council
- Maidstone Borough Council
- Mid Sussex District Council
- Rother District Council
- Royal Society for the Protection of Birds
- Sevenoaks District Council
- Southern Water (as per request by KCC at scoping stage)
- South East Water
- Tandridge District Council
- Tonbridge & Malling Borough Council
- Upper Medway Internal Drainage Board
- Wealden District Council
- West Kent Primary Care Trust
- Woodland Trust

7.2 Post-consultation Changes

- 7.2.1 As a result of the consultation with various stakeholders on the Interim SA Report, changes have been made to reflect consultation responses. The consultation has been carried out to enable the findings and recommendations of the Interim SA Report to be reflected whilst developing reasonable alternatives for the Local Plan and identifying the likely significant effects of available options before arriving to the preferred option approach.
- 7.2.2 The development and appraisal of options is an iterative process, with options being revised to take account of the appraisal findings which are documented in this Interim SA Report. The consultation on the Interim SA Report ran from the 2 May to 12 June 2017. This document was available on the TWBC website at:
<http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/new-local-plan>
- 7.2.3 A number of comments have been received with regards to the SA process and the SA Report. The main concerns were associated with finding the right balance between environmental and economic considerations of the Plan Options: potential adverse effects on landscape, biodiversity, water security, noise and air quality.
- 7.2.4 Following the consultation exercise, amendments have been made throughout the Interim SA Report document for further clarification, and full responses to the issues raised have been included in Appendix C of this document.
- 7.2.5 The detailed SA assessments scoring sheets for each of the strategic options have been provided in Appendix B to this Interim SA Report. Some guide questions have been reworded and additional guide questions for 'equality' and 'biodiversity' will be included in the SA framework to be used in the subsequent stages of the SA process in light of the comments received. Chapter on monitoring has been amended to add more clarity on the monitoring need and process that TWBC intends to undertake.
- 7.2.6 A few comments have been received recommending considering the growth through more dispersed development of hamlets and farmsteads as a reasonable alternative. Dispersed settlement is a key historical characteristic of the area and in particular the High Weald AONB that originates from the medieval period. This historical pattern is overlaid by more recent patterns of development including in places sporadic ribbon development and large modern estates but within the High Weald and the rural areas in particular the medieval pattern of dispersed settlement remains even and is a key characteristic of the landscape. Dispersed settlement to a degree already occurs through rural windfall sites and agricultural conversions which continue to make a significant contribution to the overall housing delivery in rural areas. The Council has shown its support for continuing this approach through the Farmsteads Assessments Guidance SPD which provides an assessment process that includes exploring the capacity for new development within the farmstead as part of an overall masterplan.

- 7.2.7 There are a number of concerns with moving forward to a more permissive policy for dispersed rural settlement or for moving towards allocating small rural sites. These concerns include the resources required to search for, assess and allocate large numbers of small sites but primarily relate to the limited contribution such sites can make to affordable housing and infrastructure as well as the potential for a number of small sites to cumulatively have and adverse effect on the historical landscape.
- 7.2.8 The Council will consider as apart of its proposed spatial preferred option the role policy may have in the continued support for rural windfall sites and agricultural conversions including farmsteads and whether this policy could be more permissive or developed in some way to increase the contribution this sector makes to housing number without undermining the existing historical settlement pattern.
- 7.2.9 Overall, the consultation responses prompted the need to revisit some scores given during the initial SA assessment, however, this did not lead to any changes to scores and conclusions in the document.

8 Next Steps

- 8.1.1 The next step for the sustainability appraisal process is to continue applying the appraisal methodology as options are refined and preferred options become clear.
- 8.1.2 It will then be appropriate to begin to appraise the various land options for allocating sites, provide recommendations on such sites and feed back for the draft Local Plan.
- 8.1.3 Finally, an appraisal of draft development management policies will be required to guide this process.
- 8.1.4 Upon completion of the above steps, it will be possible to finalise the Sustainability Appraisal report, which will be published for consultation alongside the draft Local Plan. This is likely to be in 2018.

Appendices

Appendix A

Guide Questions Used for Scoring Sustainability Objectives

Table 9. Indicators or decision-aiding questions used for scoring sustainability objectives

| Topic | Objective | Guide questions Does the Policy/Plan/Objective.....? |
|-------------------------|---|---|
| Air | 1. Reduce air pollution | ...help meet NO ₂ and PM ₁₀ targets along the A26 in Royal Tunbridge Wells? |
| | | ...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options? |
| | | ...promote forms of active travel including cycling and walking? |
| | | ...help reduce premature deaths from poor air quality (cause by PM _{2.5})? |
| 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)? |
| | | ...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations? |
| | | ...support work to improve condition of SSSIs? |
| Business Growth | 3. Encourage business growth and competitiveness | ...help support existing business and the growth of new businesses? |
| | | ...support growth of the local economy from professional and 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)? |
| | | ...recognise and help develop the rural economy? |
| 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? |
| | | ...support reduction in carbon and energy so targets are consistently met? |
| | | ...support opportunities to utilise biomass in the borough? |
| | | ...support opportunities to install community heating schemes? |
| Deprivation | 5. Reduce poverty and assist with regeneration | ...address pockets of deprivation and encourage regeneration? |
| | | ...reduce rates of fuel poverty? |
| Education | 6. Improve educational attainment and enhance the skills base | ...meet demand for school places? |
| | | ...continue to support a high proportion of highly qualified residents? |
| Employment | 7. Facilitate and support employment opportunities | ...improve employment opportunities in key wards? |
| Equality | 8. Increase social mobility and inclusion | ...improve physical activity rates for low income population groups? |
| | | ...improve social mobility problems caused by selective grammar schools? |
| Health | 9. Improve health and wellbeing, and reduce health inequalities | ...meet demand for elderly care services? |
| | | ...improve physical activity rates for at risk population groups? |
| | | ...address pockets of health deprivation? |
| | | ...help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers? |

| Topic | Objective | Guide questions Does the Policy/Plan/Objective.....? |
|-------------------------|---|---|
| | | ...meet need for accessible open or linear green space and recreation facilities for all? ...ensure residents can access heritage assets? |
| Heritage | 10.Preserve and enhance historical and cultural heritage assets | ...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance? ...provide a framework for a positive heritage strategy including enhancements in line with NPPF? |
| Housing | 11.Provide sufficient housing to meet identified needs | ...meet identified needs for affordable housing? ...meet demand for housing suitable for older people downsizing? ...meet demand for 2 and 3 bed market housing to suit expanding families? ...make allowances in housing targets due to environmental constraints in the borough? |
| Land use | 12.Protect soils, and reuse previously developed land and buildings | ...protect Green Belt? ...develop on previously developed in preference to greenfield land? ...prioritise development on lower grade agricultural soils? |
| Landscape | 13.Protect and enhance landscape and townscape | ...protect and enhance the High Weald AONB and historic landscape? ...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? ...strengthen Green Infrastructure? ...protect and enhance landscape and townscape character and quality? |
| Noise | 14.Reduce noise pollution | ...consider noise pollution in Important Areas for Road Noise? ...consider noise pollution from aircraft and trains? |
| Resources | 15.Reduce the impact of resource consumption | ...prevent unsustainable demolition and rebuild projects? ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? |
| Services and facilities | 16.Improve access to and range of key services and facilities | ...support the contribution to the local economy from tourism? ...support superfast broadband connectivity in final 5% of the borough? ...improve range of services and facilities especially in rural settlements? ...retail and leisure growth? ...improve access to services and facilities especially in rural settlements? |
| Travel | 17.Improve travel choice and reduce the need to travel by private vehicle | ...support priority transport projects? ...prioritise easy access to train stations within and outside the borough? ...improve rural bus services and retain viability of urban bus services? ...support opportunities for active travel including cycling and walking? |
| Waste | 18.Reduce waste generation and disposal | ...support continued decline in household waste reduction? ...improve rates of household waste diverted from landfill? ...reduce construction waste? |
| Water | 19.Manage flood risk and conserve, protect and enhance water resources | ...reduce water consumption rates? ...manage impacts from flooding? ...exacerbate flood risk on or off site? ...support improvements in groundwater quality? ...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities? |

Appendix B

Detailed Scoring for Growth Strategy Options

Business as Usual - No Plan Option

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|--|--|---|---|---|---|--|---|---|--|--------------------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Air | Reduce air pollution | ...help meet NO2 and PM10 targets along the A26 in Royal Tunbridge Wells? | Significantly increases traffic in AQMA e.g. >50 vehicles per day | Increases traffic in AQMA e.g. 10 - 50 vehicles per day | Slightly increases traffic in AQMA e.g. <10 vehicles per day | e.g. reduces private car use but increases business or commercial traffic. | Neither increases nor reduces traffic in AQMA | Slightly reduces traffic in AQMA e.g. <10 vehicles per day | Reduces traffic in AQMA e.g. 10-50 vehicles per day | Significantly reduces traffic in AQMA e.g. >50 vehicles per day | High Legislatively driven. | | Piecemeal development could have a very negative impact upon air quality in RTW as development in these locations will be preferred for access to service and facilities but hard to consider cumulatively. If past trends continue, only relatively small developments in RTW will come forward, which provide less money for improvements than likely to receive with a plan and suitable policy in place |
| | | ...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options? | Removes support for improving air quality with significant negative consequences | Removes support for improving air quality | Removes support for improving air quality with minimal negative consequences | e.g. supports local car club but also increases parking for private cars | Neither offers nor removes support for improving air quality | Provides support for improving air quality with minimal benefits | Provides support for improving air quality | Provides support for improving air quality with significant benefits | 0 | -- | Existing policy could be used to encourage active travel but not as strong as could be. |
| | | ...promote forms of active travel including cycling and walking? | Cycling and walking discouraged e.g. >50 less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. <10 cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | Piecemeal growth more likely to be accepted in main towns and support for improving air quality in it's infancy, it is highly likely that existing sensitive receptors will experience higher rates of poor air quality |
| | | ...help reduce premature deaths from poor air quality (cause by PM2.5)? | Sensitive receptors inside AQMA | Sensitive receptors in area with busy traffic | Sensitive receptors in area with some traffic | e.g. relocates sensitive receptors into area of equally poor air quality | Health of sensitive receptors unchanged | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors in area with significantly less traffic and outside AQMA | High Lives at stake. | | |
| Biodiversity | 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)? | Full loss of a site of biodiversity value | Partial loss of a site of biodiversity value | Degradation of a site of biodiversity value | e.g. improvements to one site come at expense of another site | No impact upon sites of biodiversity value | Protection of site of biodiversity value | Protect and improve site of biodiversity value | Protect, improve and increase size/function of site of biodiversity value | 0 | | 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. Funding for SAMM could be collected for piecemeal development. However, without a plan in place and appropriate policy, risks are present. Difficult to score until know exact location of development but assumed that al SSSI in borough would be protected as a minimum. |
| | | ...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations? | Likely significant effects definite, no effective mitigation available | Likely significant effects probable, mitigation may be ineffective | Likely significant effects possible, mitigation likely to be effective | e.g. effectiveness of mitigation available to prevent likely significant effects is unknown | No impact upon the Ashdown forest | No or insignificant impact upon the Ashdown Forest and provision of some green space | No or insignificant impact upon the Ashdown Forest disturbance and provision of SAMMS | No or insignificant impact upon the Ashdown Forest disturbance and provision of SANGS | High Ashdown Forest is of international significance | -- | |
| | | ...support work to improve condition of SSSIs? | Full loss of a SSSI | Partial loss of a SSSI | Degradation of a SSSI | e.g. a combination of negative and positive impacts | Neither improves nor contributes to a decline in the condition of SSSIs | Protection of SSSI | Protect and improve | Protect, improve and increase size/function | High SSSIs are of national significance | | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|---|--|---|---|---|---|---|--|---|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Business Growth | ...help support existing business and the growth of new businesses? | - Loss of >500m2 floor space/premises suitable for new businesses - Extremely slow broadband - Extremely limited transport options - Extremely limited availability of staff | - Loss of 250m2 - 500m2 floor space/premises suitable for new businesses - Very slow broadband speed - Very limited transport options - Limited availability of staff | - Loss of up to 250m2 floor space/premises suitable for new businesses - Slow broadband speed - Limited transport options - Limited availability of suitable staff | e.g. suitable premises but no fast broadband | No impact on new business survival | - Gain of up to 250m2 floor space/premises suitable for new businesses - Reasonable broadband speed - Small range of transport options - Small range of suitable staff | - Gain of 250m2 - 500m2 floor space/premises suitable for new businesses - Good broadband speed - Wide range of transport options - Wide range of suitable staff | - Gain of >500m2 floor space/premises suitable for new businesses - Fast broadband speed - Very wide range of transport options - Very wide range of suitable staff | Less weight than national average (see Economic Needs Assessment) | | With housing in high demand and lack of strong policy, suitable businesses premises may be lost to housing. |
| | ...support growth of the local economy from professional and financial services, health and education, and construction-related activities. | Loss of > 500m2 floor space | Loss of 250m2 - 500m2 floor space | Loss of < 250m2 floor space | e.g. support for one industry associated with a loss for another industry | No impact on wholesale, health and finance industries | Gain of < 250m2 floor space | Gain of 250m2 - 500m2 floor space | Gain of > 500m2 floor space | 0 | ? | Need to know what type of development is proposed to score accurately. Development in urban areas is likely to support these industries (staff & transport). However, mixed picture as loss of economic floor space may occur in preference to housing whereas construction-related activities are likely to be supported by the significant development needed. Housing demands are extremely high and residential development is a more viable option for developers. It seems likely that some economic floor space will be sacrificed (as has been the trend up to now). Developing in the urban areas is likely to exacerbate this trend as more economic floor space is located here. A policy would be introduced to proven this happening. |
| | ...prevent loss of economic floor space in preference for housing and other non employment generating uses within Key Employment Areas and other well located employment sites? | > 500m2 economic floor space lost in preference for housing | 250m2 - 500m2 economic floor space lost in preference for housing | < 250m2 economic floor space lost in preference for housing | e.g. viability of existing economic floor space unknown | No impact on economic floor space or economic floor space lost in non-viable location | Housing development preserves existing economic floor space | Housing development preserves existing or provides for more economic floor space | Housing development preserves existing and provides for additional economic floor space | 0 | | |
| | ...recognise and help develop the rural economy? | Rural economy lost and prevented from developing in the future | Loss for the rural economy | Rural economy diminished | e.g. support for one industry associated with a loss for another industry | No impact on the rural economy | Rural economy protected | Rural economy protected and expanded | Rural economy protected and significantly expanded | 0 | | Difficult to score until know exact location of development |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|--|--|---|--|--|--|---|---|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Climate Change & Energy | ...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures? | Adaptation measures excluded with significant negative consequences | Adaptation measures excluded | Adaptation measures excluded but with minimal negative consequences | Adaptation measures have negative consequences e.g. drought resilient plants are preferable to invasive species | Adaptation is not possible or no climate change pressures exist in that location | Adaptation measures incorporated but with minimal benefits | Adaptation measures incorporated | Adaptation measures incorporated with significant benefits | 0 | | Difficult to score until know exact details of development |
| | ...support reduction in carbon and energy so targets are consistently met? [Nb. short term effects e.g. construction related are considered by Objective 15: Resources] | Increases carbon significantly compromising reduction target | Increases carbon making reduction target difficult to achieve | Maintains status quo. Increases carbon slightly but reduction target is still achievable | e.g. reduces carbon from domestic sources but increases carbon from transport | Neither increases nor reduces carbon | Reduces carbon but unlikely to meet annual target | Meets annual carbon reduction targets | Exceeds annual carbon reduction targets | High Targets are currently not being met. | --- | High demand for housing means piecemeal building of a likely large number of new homes and an associated increase carbon and energy demands significantly. Lack of strong energy policy will worsen this. |
| | ...support opportunities to utilise biomass in the borough? | Biomass opportunities discouraged with significant negative consequences | Biomass opportunities discouraged | Biomass opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages biomass | Biomass opportunities supported | Biomass opportunities supported and realised | Biomass opportunities supported and realised with significant benefits | 0 | | Opportunities less likely to be realised without policy direction. |
| | ...support opportunities to install community heating schemes? | Community heating opportunities discouraged with significant negative consequences | Community heating opportunities discouraged | Community heating opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages community heating | Community heating opportunities supported | Community heating opportunities supported and realised | Community heating opportunities supported and realised with significant benefits | Low Opportunities are limited | | Schemes highly unlikely to come forward without strategic planning. |
| Deprivation | ...address pockets of deprivation and encourage regeneration? | Significant regeneration diverted away from a pocket of severe deprivation | Some regeneration activates diverted away from pocket of deprivation | Small amount of regeneration activates diverted away from pockets of deprivation | e.g. regeneration adjacent to a pocket of deprivation may trigger future regeneration but there is no guarantee | No impact upon pockets of deprivation | Small amount of regeneration in a pocket of deprivation | Some regeneration in a pocket of deprivation | Significant regeneration in a pocket of severe deprivation e.g. major housing or retail development | 0 | | Without control over where development occurs, no guarantee of being able to regenerate areas in need. |
| | ...reduce rates of fuel poverty? | Energy demand increase of >50% | Energy demand increase of 10% - 50% | Energy demand increase of <10% | e.g. energy saving principles incorporated but users unlikely to be affected by fuel poverty | No impact on fuel poverty | Energy reductions of <10% | Energy reductions of 10% - 50% | Energy reductions of >50% | 0 | | Currently no strong planning policy relating to fuel poverty or energy conservation. Lack of plan and increase in house building would worsen the situation. |
| Education | Improve educational attainment and enhance the skills base ...meet demand for school places? | Will increase demand by >50% | Will increase demand by 10-50% | Will increase demand by <10% | New school proposed in long term but impact of demand will be felt in short term | No impact on school places or demand for new places can be accommodated | Will reduce demand by <10% | Will reduce demand by 10-50% | Will reduce demand by >50% | HIGH More pressing need | --- | New piecemeal development highly unlikely to address existing demands. An unplanned large development may offer to help meet future demand but this is not as preferable to strategic planning where the locations most in need can be targeted. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|--|--|---|---|--|---|--|--|---|--|--|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...continue to support a high proportion of highly qualified residents? | Complete removal of significant support | Reduces support | Small reduction in support | e.g. support for higher education comes at expense of further education | No impact on highly qualified residents | Provides a small amount of support | Provides support | Provide significant support | 0 | | Difficult to score until know exact details of development | |
| Employment | Facilitate and support employment opportunities | ...improving employment opportunities in key wards? | In key wards... - Loss of a significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Extremely poor access to transport - Very poor opportunities for developing new skills | In key wards... - Loss of a number of permanent employment opportunities provided e.g. 10-50 new jobs - Very poor access to transport - Poor opportunities for developing new skills | In key wards... - Loss of a small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Poor access to transport - Very poor opportunities for developing new skills | e.g. job opportunities at risk but not certain | No impact on employment opportunities in key wards | In key wards... - A small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Reasonable access to transport - Reasonable opportunities for developing new skills | In key wards... - Number of permanent employment opportunities provided e.g. 10-50 new jobs - Good access to transport - Good opportunities for developing new skills | In key wards... - Significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Very good access to transport - Very good opportunities for developing new skills | LOW Unemployment in borough is very low generally | ? | Difficult to score until know exact location of new development |
| Equality | Increase social mobility and inclusion | ...improve physical activity rates for low income population groups? | A significant number of opportunities affecting the lowest income population groups missed | Opportunities missed | A small number of opportunities missed | e.g. support in one parish comes at expense of support elsewhere | No impact on physical activity rates | A small number of opportunities provided | Opportunities provided | A significant number of opportunities provided that benefit the lowest income population groups | 0 | ? | Difficult to score without exact location of future development |
| | | ...improve social mobility problems caused by selective grammar schools? | Provision for a new grammar school | Expansion of an existing grammar school | Increase in catchment area of existing grammar school | e.g. grammar school dedicates places for low income families | No impact on selective education | Increase in catchment area of existing non-selective school | Expansion of an existing non-selective secondary school | Provision for a new non-selective secondary school | 0 | | Difficult to score without exact details of future development |
| Health | Improve health and wellbeing, and reduce health inequalities | ...meet demand for elderly care services? | Does not meet existing demand and significantly increases future demand | Does not meet existing demand and increases future demand | Does not meet existing demand | e.g. meets existing demand at expense of future demand or vice versa | Does not impact upon elderly care services | Meets existing demand | Meetings existing demand and reduces future demand | Meet existing demand and significantly reduces future demand | HIGH Growing elderly population | | Difficult to score without exact details of future development |
| | | ...improve physical activity rates for at risk population groups? | Significantly reduces changes for improvement of physical activity rates for at risk populations | Reduces chances for improvement of physical activity rates for at risk populations | Slightly reduces chances for improvement of physical activity rates for at risk populations | e.g. increasing physical activity rates for some at risk populations comes at the expense of other at risk populations | Neither increases nor reduces physical activity rates | Slightly increases physical activity rates for at risk populations | Increases physical activity rates for at risk populations | Significantly increases physical activity rates for at risk populations | 0 | ? | Without control over where development occurs, no guarantee of assistance from development in locations of at risk populations. |
| | | ...address pockets of health deprivation? | Significantly reduces changes for improvement of pockets of health deprivation | Reduces chances for improvement of pockets of health deprivation | Slightly reduces chances for improvement of pockets of health deprivation | e.g. reduces or improves one area of health deprivation at the expense of a different area | Does not impact upon pockets of health deprivation | Will slightly improve or reduce pockets of health deprivation | Will improve or reduce pockets of health deprivation | Will significantly improve or reduce pockets of health deprivation | 0 | | Without control over where development occurs, no guarantee of assistance from development in locations of health deprivation |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|---|---|---|---|--|--|--|---|--|--------------------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | | | | +++ Very Positive |
| | ...help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers? | Removes provision of specialist health care or support services and causes significant problems | Removes provision of specialist health care or support services | Removes provision of specialist health care or support services, but accessible services are still available | e.g. helps one illness at the expense of another illness | Does not impact upon specialist health care or support services | Helps with provision of specialist health care or support services but with minimal benefits | Helps with provision of specialist health care or support services | Significantly helps with provision of specialist health care or support services | 0 | | Difficult to score without exact details of future development |
| | ...meet need for green open space and recreation facilities? | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is both too far (more than twice recommended distance) and/or too small (less than half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either too far (e.g. twice recommended distance) and/or too small (e.g. half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either slightly too far (less than twice recommended distance) and/or slightly too small (more than half recommended size) | e.g. Accessible Natural Greenspace is allocated to one population at the expense of a different population | Green open space and recreation facilities not relevant | Meets 1 or 2 Accessible Natural Greenspace Standards | Meets 3 or 4 Accessible Natural Greenspace Standards | Meets all Accessible Natural Greenspace Standards | HIGH TWBC is already behind on these standards | | Needs are less likely to be met without strategic planning as piecemeal development may not consider Accessible Natural Greenspace Standards. |
| | ...ensure residents can access heritage assets? | Significantly worsens or prevents access to heritage assets (e.g. severance of access route) | Worsens access to heritage assets (e.g. removes pedestrian access) | Slightly worsens access to heritage assets (e.g. pedestrian access route lengthened) | e.g. access is possible but other factors may prevent visits | Does not impact upon access to heritage assets | Slightly improves access to heritage asset (e.g. pedestrian access route shortened) | Improves access to heritage assets (e.g. provision for new modes of travel) | Significantly improves access to heritage assets (e.g. addition of new access route) | 0 | | Difficult to score until know exact location of development |
| Heritage | Preserve and enhance historical and cultural heritage assets | Significantly fails to protect, e.g. total demolition of a heritage asset, complete loss a significant contributor in historic area, complete loss of archaeological site, complete loss of element of setting which forms an important part of its significance. | Fails to protect, e.g. partial demolition of a heritage asset, removal of a part of a heritage asset that contributes strongly to significance, partial loss of element of setting that forms part of its significance. | Protection compromised, e.g., causes less than significant harm by partial demolition, removal of part of a heritage asset, or a structure that forms part of its setting. | Protection or enhancement possible but other policies could hinder, e.g. green belt designation, AONB, housing quotas, requirements for commercial use, potential for preventing reuse of historic buildings at risk. | No impact. Does not prevent or cause harm e.g. no impact on the special architectural or historic character of a building, structure or area, or any impact on archaeology | Protects heritage assets from harm or deterioration e.g. allows reuse of heritage assets which prevents deterioration or further harm, stabilises condition of heritage assets, a use which would allow for retention of setting, enables long term appropriate use of asset | Protects and enhances significance, e.g. allows restoration of historic features, setting, allows interpretation, removes detractors to its significance, enables long term optimum viable use | Provides significant enhancement e.g. use which allows for its retention if redundant, a complete restoration of a building at risk, complete restoration of an important part of a conservation area, removal of significantly harmful detractors. | High Assets and settings are often finite or hard to restore once lost | | Without control over where development occurs, no guarantee of being able to protect historical and cultural heritage assets. |
| | ...provide a framework for a positive heritage strategy including enhancements in line with NPPF? | Significantly worsens provision by the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Worsens provision by the historic environment for the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Prevents enhancement opportunities for and by the historic environment for one of the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Provides potential for enhancement of and by the historic environment but other priorities could hinder | No opportunities for enhancement are available. | Slight enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Significant enhancement opportunities from the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | 0 | | Strategic framework less likely to be realised without borough-wide planning. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|--|---|---|--|--|--|--|--|--|---|--------------------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Housing | Provide sufficient housing to meet identified needs | ...meet identified needs for affordable housing? | No provision made for affordable housing and demands increased significantly | No provision made for affordable housing and demands increased | No provision made for affordable housing | e.g. affordable housing needs met in one site/phase/ location at the expense of another | No relevance to affordable housing | A small proportion of affordable housing needs met | Affordable housing needs partially met | Affordable housing needs met in (or near) full | High Housing demands in borough are not being met. | | Existing policy could be used but stronger direction in new local would provide stronger guarantees and use latest studies. |
| | | ...meet demand for housing suitable for older people downsizing? | No provision made for older persons housing needs and demands increased significantly | No provision made for older persons housing needs and demands increased | No provision made for older persons housing needs | e.g. older persons housing needs met in one site/phase/ location at the expense of another | No relevance to older persons housing needs | A small proportion of older persons housing needs met | Older persons housing needs partially met | Older persons housing needs met in full | High Housing demands in borough are not being met. | + | Some needs likely to be met but lack of policy direction would reduce drive. |
| | | ...meet demand for 2 and 3 bed market housing to suit expanding families? | No provision made for 2 and 3 bed housing needs and demands increased significantly | No provision made for 2 and 3 bed housing needs and demands increased | No provision made for 2 and 3 bed housing needs | e.g. 2 and 3 bed housing needs met in one site/phase/ location at the expense of another | No relevance to 2 and 3 bed housing demands | A small proportion of demand for 2 and 3 bed market housing met | Some of the demand for 2 and 3 bed market housing met | Demand for 2 and 3 bed market housing met in full | High Housing demands in borough are not being met. | | Some needs likely to be met but lack of policy direction would reduce drive. |
| | | ...make allowances in housing targets due to environmental constraints in the borough? | No allowances made and constraints not given weight | No allowances made and constraints given limited weight | No allowances made but constraints given moderate weight | e.g. allowances made in one location at the expense of another | Not relevant to housing targets | Limited allowances made | Some allowances made | Significant allowances made | 0 | | |
| Land use | Protect soils, and reuse previously developed land and buildings | ...protect Green Belt? | Development would detract from all of the 5 purposes of the Green Belt | Development would detract from 3-4 of the purposes of the Green Belt | Development would detract from 1-2 of the purposes of the Green Belt | e.g. development is not on Green Belt but may benefit or detract from adjacent Green Belt | No impact upon Green Belt or impact is on an area of land that serves none of the 5 purposes of Green Belt | Development would respect the 5 purposes of the Green Belt | Development would respect the 5 purposes of the Green Belt and enhances beneficial use | Development would respect the 5 purposes of the Green Belt and significantly enhances beneficial use | 0 | | Difficult to score until know exact locations of future development. |
| | | ...develop on previously developed land in preference to greenfield land? | >50% of development located on greenfield land | 10%-50% of development located on greenfield land | Up to 10% of development located on greenfield land | e.g. previous use of land unknown | No impact on land type | Development entirely on previously development land and adjacent to greenfield | Development entirely on and adjacent to previously development land | Development located entirely on and surrounded by previously developed land | High. Housing white paper suggests great weight should be applied to suitable b/f | -- | Location choice would be in the hands of the developers. Likely to be greenfield losses. |
| | | ...prioritise development on lower grade agricultural soils? | >20ha of development on best and most versatile soils | <20ha of development on best and most versatile soils | Development on agricultural soils of any grade | e.g. grading of agricultural soil unknown | No impact on agricultural soils or no change to soil grading | Protect agricultural soils of any grade | Protect and improve <20ha of best and most versatile soils | Protect and improve >20ha of best and most versatile soils | 0 | | Location choice would be in the hands of the developers. Likely to be BMV soil losses. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|---|---|---|---|--|---|--|---|---|--------------------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | | | | +++ Very Positive |
| | ...protect and enhance the High Weald AONB and historic landscape? | 1) Near full or full loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/pattern: - near completely or completely out of keeping with existing settlement | 1) Partial loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/pattern: - out of keeping with existing settlement | 1) Degradation of: - exposed geology - gills, streams, ponds - woodland - fields and heath - routeway 2) Scale/setting/pattern: - slightly out of keeping with existing settlement | e.g. exposed geology protected but pond degraded or one routeway diverted and another restored or improvements to settlement edge but development is still out of scale | No impact on the AONB | 1) Protection of: - exposed geology - gills, streams, ponds - routeway - woodland (W1) - fields and heath - routeway 2) Scale/setting/pattern: - generally in keeping with existing settlement - no significant harm | 1) Protection & improvement of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath - routeway 2) Scale/setting/pattern: - in keeping with existing settlement - no harm | 1) Protection, improvement & increase size/function of: - exposed geology - gills, streams, ponds - routeway - woodland (W2) - fields and heath - routeway 2) Scale/setting/pattern: - in keeping with and enhances existing settlement | Great weight as per NPPF | | Much of borough in AONB and lack of planned development is more likely to put sensitive locations at risk. |
| Landscape | Protect and enhance landscape and townscape | 1) Near full or full loss of ancient woodland 2) Near full or full loss of management opportunities or access | 1) Partial loss of ancient woodland 2) Partial loss of management opportunities or access | 1) Degradation of ancient woodland 2) Scaled down management opportunities or access | e.g. recreation management conflicts with biodiversity management | No impact on ancient woodland | 1) Protection of ancient woodland 2) Improvement to existing management opportunities or access | 1) Protection and enhancement of ancient woodland 2) Addition of management opportunities or access | 1) Protection, enhancement and improve function of ancient woodland 2) Significant addition of management opportunities or access | High AW is a finite habitat | -- | Difficult to score without exact locations of development. However, NPPF para 118 suggests loss or deterioration of ancient woodland would be refused (unless benefits outweigh the loss). Recent Housing White Paper also places emphasis on protecting ancient woodland. |
| | ...strengthen Green Infrastructure? | Near full or full loss of GI and/or full loss of management opportunities | Partial loss of GI and/or partial loss of management opportunities or access | Degradation of GI and/or scaled down management opportunities or access | e.g. a combination of negative and positive impacts | No impact on GI or no net loss of GI | Protection of GI and/or improvement to existing management opportunities | Protection and enhancement of GI and/or addition of management opportunities | Protection, enhancement and increase size/function of GI and/or significant addition of management opportunities | 0 | | Lack of plan could mean weaker mitigation to replace lost important GI. |
| | ...protect and enhance landscape and townscape character and quality? | High adverse impacts | Moderate adverse impacts | Minor adverse impacts | e.g. a combination of negative and positive impacts | No visual impacts or impact on landscape and townscape character and quality | Minor positive impacts | Moderate positive impacts | High positive impacts | 0 | | Blending new development with rural settlements could be challenging and lack of up dated policy to ensure high quality and sympathetic design could put character at risk |
| Noise | Reduce noise pollution | ...consider noise pollution in Important Areas for Road Noise? - Increase road noise dramatically in an IARN - Position sensitive receptors in an IARN | - Increase road noise in an IARN - Develop large number of residential housing in an IARN | - Increase road noise slightly in an IARN - Develop residential housing in an IARN | e.g. development is adjacent to an IARN and may contribute to worsening effects | No impact upon an IARN | - Reduce road noise slightly in an IARN - Provide noise mitigation for residents located in an IARN | - Reduce road noise in an IARN - Relocate number of sensitive receptors away from an IARN | - Reduce road noise dramatically in an IARN - Relocate large number of sensitive receptors away from an IARN | HIGH Great control over this issue and more certainty | -- | Lack of strategic planning may mean IARNs are harder to avoid, as housing demand is so high and cumulative impacts are overlooked at level of individual development. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|---|--|---|--|---|---|--|--|---|-------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...consider noise pollution from aircraft and trains? | - Position sensitive receptors in flight path or adjacent to main railway | - Develop residential housing in main flight path (20 flights per day or more) or adjacent to main railway | - Develop residential housing on edge of flight path (5-20 flights per day) or near to main railway | e.g. flight path subject to change | No impact upon flight path | - Provide noise mitigation for residents located in flight path or near to main railway | - Relocate number of sensitive receptors away from edge of flight path or adjacent to railway | - Relocate large number of sensitive receptors away from main flight path or adjacent to railway | 0 | | Ditto flight paths/railway lines. |
| Resources | Reduce the impact of resource consumption | Demolition and rebuild required | Demolition and rebuild encouraged | Demolition and rebuild promoted slightly | e.g. demolished building is unusable and new build is extremely sustainable | Demolition and rebuild not applicable | Demolition and rebuild reduced slightly | Demolition and rebuild reduced | Demolition and rebuild prevented | 0 | | High demand for housing could mean this approach is adopted as land becomes available instead of adopting a more proactive approach in which the most suitable land is sought out. |
| | ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? | Responsible sourcing/low impact materials prohibited | Responsible sourcing/low impact materials strongly discouraged | Responsible sourcing/low impact materials discouraged slightly | e.g. suitable low impact/responsibly sourced material does not currently exist | Responsible sourcing//low impact materials not applicable | Responsible sourcing/low impact materials encouraged slightly | Responsible sourcing/low impact materials strongly encouraged | Responsible sourcing/low impact materials mandatory | 0 | | Lack of existing policy means this approach is extremely unlikely. |
| Services and facilities | Improve access to and range of key services and facilities | ...support the contribution to the local economy from tourism? | Tourism discouraged | Tourism discouraged slightly | e.g. opening a new attraction reduces visitors to an existing attraction | Tourism not relevant | Tourism supported slightly | Tourism supported | Tourism supported strongly e.g. opening of major attraction | Low Tourism contributes a relatively small amount to local economy | | Difficult to score without knowledge of development location. |
| | ...support superfast broadband connectivity in final 5% of the borough? | Development in all of the locations of borough not connected to superfast broadband | Development in some of the locations of borough not connected to superfast broadband | Development in a few of the locations of borough not connected to superfast broadband | e.g. speed for a particular location is not known | No impact upon broadband speeds in areas of need. | Development that guarantees superfast connection in a few of the locations of borough not currently connected | Development that guarantees superfast connection in a some of the locations of borough not currently connected | Development that guarantees superfast connection in all of the locations of borough not currently connected | 0 | | Difficult to score without knowledge of development location. |
| | ...improve range of services and facilities especially in rural settlements? | Loss and poor range of existing key services or facilities | Loss or poor range of existing key services or facilities | Loss or limited range of existing key services or facilities | e.g. improvements in one service and loss of another service | Not relevant to provision of services and facilities | Gain or good range of existing services or facilities | Gain or near full range of existing key services or facilities nearby | Gain or full range of existing key services or facilities and wide range of further services and facilities nearby | High A critical issue when determining where to develop. More weight if a rural settlement. | | 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. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|--|---|--|--|---|--|---|--|-------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...retail and leisure growth? (study underway) | Loss and poor range of existing retail and leisure facilities | Loss or poor range of existing retail and leisure facilities | Loss or limited range of existing retail and leisure facilities | e.g. improvements in one facility and loss of another facility | Not relevant to provision of retail and leisure facilities | Gain or good range of existing retail and leisure facilities | Gain or near full range of existing retail and leisure facilities | Gain or full range of existing retail and leisure facilities and wide range of further retail and leisure facilities nearby | 0 | | Difficult to score without knowledge of development location. |
| | ...improve access to services and facilities especially in rural settlements? | Nearest services or facilities only accessible by private car OR existing accessibility worsened significantly | Public transport needed to access services and facilities is infrequent or unreliable OR existing accessibility worsened | Key services and facilities accessible only by public transport OR existing accessibility worsened slightly | Access route undetermined | Not relevant to access to services and facilities | Key services and facilities are within desirable walking distance OR existing accessibility improved slightly | Key services and facilities are within desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved | Key services and facilities are within half the desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved significantly | High A critical issue when determining where to develop. More weight if a rural settlement. | | Difficult to score without knowledge of development location. |
| | ...support priority transport projects? | Significant negative impact e.g. multiple projects inhibited | Some negative impact e.g. severe delays | Slight negative impact e.g. project delayed | e.g. one project supported at the expense of another | Priority transport projects unaffected | Minimal support e.g. project recognised or land reserved | Support given to promote one or more projects | Significant support e.g. multiple projects promoted or accelerated timescales | 0 | | Piecemeal development highly unlikely to be designed to improve areas linked to priority transport projects. |
| Travel | Improve travel choice and reduce the need to travel by private vehicle | Access to train station very difficult (e.g. 10miles+ or no public transport) | Access to train station difficult (e.g. 5-10 miles or very limited public transport) | Access to train station inconvenient (e.g. 3-5 miles or limited public transport) | e.g. easy access but unlikely to be train users | Access to train stations not applicable | Convenient access to train station by private car | Convenient access to train station by public transport | Convenient access to train station by foot | 0 | ? | 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. |
| | ...improve rural bus services and retain viability of urban bus services? | Significant negative impact on bus services (e.g. removal of a bus route) | Bus services worsened (e.g. loss of multiple bus stops or several services per week) | Bus services worsened slightly (e.g. loss of one bus stop or service per week) | e.g. improvements to one service or route come at expense of another | Bus services unaffected | Opportunities to improve bus services available (e.g. new bus stop or additional service each week) | Improvements to bus services (e.g. addition of multiple bus stops or services per week) | Significant positive impact on bus services (e.g. addition of new route) | LOW Bus use is generally unpopular in borough | | Ditto |
| | ...support opportunities for active travel including cycling and walking? | Cycling and walking discouraged e.g. 50+ less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. 10 less cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | Difficult to score without knowledge of site locations |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|--|--|---|--|--|---|--|---|--|----------------------------|--------------------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Waste | Reduce waste generation and disposal | ...support continued decline in household waste reduction? | Creates barriers to household waste reduction e.g. large number of new homes with no commitment to reduction | Likely to negatively affect the continued decline in household waste e.g. addition of significant number of new homes | Maintains status quo | e.g. causes increase in one stream of household waste and decline in another | Household waste unaffected | Household waste reduction considered | Some commitment and ideas for supporting household waste reduction | Strong commitment and innovative ideas for supporting household waste reduction | 0 | | There is currently only weak policy relating to waste. Demand for new housing is high. |
| | | ...improve rates of household waste diverted from landfill? | 100% waste to landfill | Approximately 50% waste to landfill | Some waste to landfill e.g. 10% | e.g. reduced waste to landfill possible but may not be achieved in practise | No waste will occur or household waste not relevant | Some waste diverted from landfill e.g. 10% | Approximately 50% waste diverted from landfill | Zero waste to landfill can be achieved. | 0 | -- | Ditto |
| | | ...reduce construction waste? | Construction waste increased significantly | Construction waste increased | Construction waste increased slightly | e.g. quantity of waste produced will depend on reputation of contractor used | No construction waste will occur or construction waste not relevant | Construction waste decreased slightly | Construction waste decreased | Construction waste decreased significantly | 0 | | Ditto |
| Water | Manage flood risk and conserve, protect and enhance water resources | ...reduce water consumption rates? | Significantly worsens existing consumption rates | Worsens existing consumption rates | Maintains status quo | e.g. impact upon consumption unclear | No impact on water consumption | Consumption rates reduced to national average | Consumption rates reduced to Building Regulations requirement of 125 lppd | Consumption rates reduced to optional standard of 110 lppd | 0 | | No strong policy on this topic at present. High demand for new housing could worsen existing situation |
| | | ...manage impacts from flooding? | Significantly worsens impacts identified from SFRA | Worsens impacts identified from SFRA | Maintains status quo | e.g. impacts are unknown | No change to flood impacts | Improves impacts from flooding | Significantly improves impacts from flooding | Eliminates impacts from flooding | 0 | | Difficult to score without knowledge of development location. |
| | | ...exacerbate flood risk on or off site? | Flood zone 3b and exception test fail | Flood zone 3a and exception test fail | Flood zone 2 and exception test fail | e.g. risk is unknown without further detail | No impact on flood risk | Flood zone 3 but exception test pass and improvements proposed e.g. SUDs | Flood zone 2 but exception test pass and improvements proposed e.g. SUDs | Flood zone 1 | High Legislatively driven. | ? | Difficult to score without knowledge of development location. |
| | | ...support improvements in groundwater quality? | High risk of contamination to groundwater e.g. source protection Zone 1 and previously contaminated land | Medium risk of contamination to groundwater e.g. source protection Zone 2 and possible previously contaminated land | Some risk of contamination to groundwater e.g. in source protection Zone 3 and unknown existing land contamination | e.g. risk is unknown without further investigation | No impact upon groundwater quality | Some support for improvements in groundwater quality | Support for improvements in groundwater quality | Significant support for improvements in groundwater quality e.g. prevention of intensive agriculture in source protection zone 1 | 0 | | Difficult to score without knowledge of development location. |
| | | ...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities? | Pressures increased significantly | Pressures increased | Pressures increased slightly | e.g. agricultural pressures reduced but water industry pressures increased | No impact upon pressures on water bodies | Pressures reduced slightly | Pressures reduced | Pressures reduced significantly | 0 | | Difficult to score without knowledge of development location. |

Option 1 - GS1 - Focussed Growth

| Sustainability Objective | Does the policy/ allocation/ objective..... | Score | | | | | | | | Weight | Final Score | Decision Making Criteria | |
|--------------------------|--|--|---|---|---|---|---|--|---|---|---|--------------------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Air | Reduce air pollution | ...help meet NO2 and PM10 targets along the A26 in Royal Tunbridge Wells? | Significantly increases traffic in AQMA e.g. >50 vehicles per day | Increases traffic in AQMA e.g. 10 - 50 vehicles per day | Slightly increases traffic in AQMA e.g. <10 vehicles per day | e.g. reduces private car use but increases business or commercial traffic. | Neither increases nor reduces traffic in AQMA | Slightly reduces traffic in AQMA e.g. <10 vehicles per day | Reduces traffic in AQMA e.g. 10-50 vehicles per day | Significantly reduces traffic in AQMA e.g. >50 vehicles per day | High Legislatively driven. | -- | Concentrating most development in RTW and SB means increased traffic in AQMA. Development in RTW/SB could collect Section 106 money for car club etc. but service still bedding in. Also, EV charge points could be added but not many people drive EV yet so would take time to see any benefit. Measures could be introduced to other main settlements for the first time. Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport in more urban areas is already relatively good so benefit may be small. Strategy does not specify exact locations for sensitive receptors. However, with growth focussed in RTW and SB and support for improving air quality in it's infancy, it is highly likely that existing sensitive receptors will experience higher rates of poor air quality |
| | | ...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options? | Removes support for improving air quality with significant negative consequences | Removes support for improving air quality | Removes support for improving air quality with minimal negative consequences | e.g. supports local car club but also increases parking for private cars | Neither offers nor removes support for improving air quality | Provides support for improving air quality with minimal benefits | Provides support for improving air quality | Provides support for improving air quality with significant benefits | 0 | | |
| | | ...promote forms of active travel including cycling and walking? | Cycling and walking discouraged e.g. >50 less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. <10 cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | |
| | | ...help reduce premature deaths from poor air quality (cause by PM2.5)? | Sensitive receptors inside AQMA | Sensitive receptors in area with busy traffic | Sensitive receptors in area with some traffic | e.g. relocates sensitive receptors into area of equally poor air quality | Health of sensitive receptors unchanged | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors in area with significantly less traffic and outside AQMA | High Lives at stake. | | |
| Biodiversity | 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)? | Full loss of a site of biodiversity value | Partial loss of a site of biodiversity value | Degradation of a site of biodiversity value | e.g. improvements to one site come at expense of another site | No impact upon sites of biodiversity value | Protection of site of biodiversity value | Protect and improve site of biodiversity value | Protect, improve and increase size/function of site of biodiversity value | 0 | - | Such a large quantity of development across the borough is highly likely to cause losses for biodiversity. Urban focus may help but brownfield sites are limited. It is recommended that mitigation schemes are devised. Focussing a large amount of development in RTW makes impacts upon the Ashdown Forest more likely. Funding for SAMM could be collected though. Difficult to score until know exact location of development but assumed that al SSSI in borough would be protected as a minimum. |
| | | ...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations? | Likely significant effects definite, no effective mitigation available | Likely significant effects probable, mitigation may be ineffective | Likely significant effects possible, mitigation likely to be effective | e.g. effectiveness of mitigation available to prevent likely significant effects is unknown | No impact upon the Ashdown forest | No or insignificant impact upon the Ashdown Forest and provision of some green space | No or insignificant impact upon the Ashdown Forest disturbance and provision of SAMMS | No or insignificant impact upon the Ashdown Forest disturbance and provision of SANGS | High Ashdown Forest is of international significance | | |
| | | ...support work to improve condition of SSSIs? | Full loss of a SSSI | Partial loss of a SSSI | Degradation of a SSSI | e.g. a combination of negative and positive impacts | Neither improves nor contributes to a decline in the condition of SSSIs | Protection of SSSI | Protect and improve | Protect, improve and increase size/function | High SSSIs are of national significance | | |
| Business Growth | Encourage business growth and competitiveness | ...help support existing business and the growth of new businesses? | - Loss of >500m2 floor space/premises suitable for new businesses - Extremely slow broadband - Extremely limited transport options - Extremely limited | - Loss of 250m2 - 500m2 floor space/premises suitable for new businesses - Very slow broadband speed - Very limited transport options | - Loss of up to 250m2 floor space/premises suitable for new businesses - Slow broadband speed - Limited transport options | e.g. suitable premises but no fast broadband | No impact on new business survival | - Gain of up to 250m2 floor space/premises suitable for new businesses - Reasonable broadband speed - Small range of transport options | - Gain of 250m2 - 500m2 floor space/premises suitable for new businesses - Good broadband speed - Wide range of transport options | - Gain of >500m2 floor space/premises suitable for new businesses - Fast broadband speed - Very wide range of transport options - Very wide range of | Less weight TW is better than national average (see Economic Needs Assessment) | 0 | 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. |

| Sustainability Objective | Does the policy/ allocation/ objective..... | Score | | | | | | | | Weight | Final Score | Decision Making Criteria | |
|--------------------------|---|---|--|---|---|---|---|--|---|--|---|--|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | availability of staff | | - Limited availability of staff | - Limited availability of suitable staff | | | - Small range of suitable staff | - Wide range of suitable staff | suitable staff | | | | |
| | ...support growth of the local economy from professional and financial services, health and education, and construction-related activities. | Loss of > 500m2 floor space | Loss of 250m2 - 500m2 floor space | Loss of < 250m2 floor space | e.g. support for one industry associated with a loss for another industry | No impact on wholesale, health and finance industries | Gain of < 250m2 floor space | Gain of 250m2 - 500m2 floor space | Gain of > 500m2 floor space | 0 | | Need to know what type of development is proposed to score accurately. Development in urban areas is likely to support these industries (staff & transport). However, mixed picture as loss of economic floor space may occur in preference to housing whereas construction-related activities are likely to be supported by the significant development needed. Housing demands are extremely high and residential development is a more viable option for developers. It seems likely that some economic floor space will be sacrificed (as has been the trend up to now). Developing in the urban areas is likely to exacerbate this trend as more economic floor space is located here. A policy would be needed to prevent this happening. Developing predominantly in urban areas is unlikely to help the rural economy but also may not cause harm as existing economy is not lost. | |
| | ...prevent loss of economic floor space in preference for housing and other non employment generating uses within Key Employment Areas and other well located employment sites? | > 500m2 economic floor space lost in preference for housing | 250m2 - 500m2 economic floor space lost in preference for housing | < 250m2 economic floor space lost in preference for housing | e.g. viability of existing economic floor space unknown | No impact on economic floor space or economic floor space lost in non-viable location | Housing development preserves existing economic floor space | Housing development preserves existing or provides for more economic floor space | Housing development preserves existing and provides for additional economic floor space | 0 | | | |
| | ...recognise and help develop the rural economy? | Rural economy lost and prevented from developing in the future | Loss for the rural economy | Rural economy diminished | e.g. support for one industry associated with a loss for another industry | No impact on the rural economy | Rural economy protected | Rural economy protected and expanded | Rural economy protected and significantly expanded | 0 | | | |
| Climate Change & Energy | 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? | Adaptation measures excluded with significant negative consequences | Adaptation measures excluded but with minimal negative consequences | Adaptation measures have negative consequences e.g. drought resilient plants are preferable to invasive species | Adaptation is not possible or no climate change pressures exist in that location | Adaptation measures incorporated but with minimal benefits | Adaptation measures incorporated | Adaptation measures incorporated with significant benefits | 0 | | Difficult to score until know exact details of development | |
| | | ...support reduction in carbon and energy so targets are consistently met? [Nb. short term effects e.g. construction related are considered by Objective 15: Resources] | Increases carbon significantly compromising reduction target | Increases carbon making reduction target difficult to achieve | Maintains status quo. Increases carbon slightly but reduction target is still achievable | e.g. reduces carbon from domestic sources but increases carbon from transport | Neither increases nor reduces carbon | Reduces carbon but unlikely to meet annual target | Meets annual carbon reduction targets | Exceeds annual carbon reduction targets | High Targets are currently not being met. | | Building a large number of new homes is likely to increase carbon and energy demands significantly. However, concentrating the development in urban areas will help reduce transport related carbon |
| | | ...support opportunities to utilise biomass in the borough? | Biomass opportunities discouraged with significant negative consequences | Biomass opportunities discouraged | Biomass opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages biomass | Biomass opportunities supported | Biomass opportunities supported and realised | Biomass opportunities supported and realised with significant benefits | 0 | | Difficult to score until know exact details of development. However, developing predominantly in urban areas will make use of biomass difficult as this is where air |

| Sustainability Objective | Does the policy/ allocation/ objective..... | Score | | | | | | | | Weight | Final Score | Decision Making Criteria | |
|--------------------------|--|--|--|---|---|---|---|--|--|---|---|---|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...support opportunities to install community heating schemes? | Community heating opportunities discouraged with significant negative consequences | Community heating opportunities discouraged | Community heating opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages community heating | Community heating opportunities supported | Community heating opportunities supported and realised | Community heating opportunities supported and realised with significant benefits | Low Opportunities are limited | | quality is poorest. RTW was identified as having some potential for community heating in the pre-feasibility study completed by KCC. However, further studies would be required. | |
| Deprivation | Reduce poverty and assist with regeneration | ...address pockets of deprivation and encourage regeneration? | Significant regeneration diverted away from a pocket of severe deprivation | Some regeneration activates diverted away from pocket of deprivation | Small amount of regeneration activates diverted away from pockets of deprivation | e.g. regeneration adjacent to a pocket of deprivation may trigger future regeneration but there is no guarantee | No impact upon pockets of deprivation | Small amount of regeneration in a pocket of deprivation | Some regeneration in a pocket of deprivation | Significant regeneration in a pocket of severe deprivation e.g. major housing or retail development | 0 | ++ | Pockets of deprivation are concentrated in urban areas. Developing here increases the likelihood that these could be improved. Difficult to score until know exact details of development. Recommend that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. Could be incorporated into affordability criteria for new homes. |
| | | ...reduce rates of fuel poverty? | Energy demand increase of >50% | Energy demand increase of 10% - 50% | Energy demand increase of <10% | e.g. energy saving principles incorporated but users unlikely to be affected by fuel poverty | No impact on fuel poverty | Energy reductions of <10% | Energy reductions of 10% - 50% | Energy reductions of >50% | 0 | | |
| Education | Improve educational attainment and enhance the skills base | ...meet demand for school places? | Will increase demand by >50% | Will increase demand by 10-50% | Will increase demand by <10% | New school proposed in long term but impact of demand will be felt in short term | No impact on school places or demand for new places can be accommodated | Will reduce demand by <10% | Will reduce demand by 10-50% | Will reduce demand by >50% | 0 | -- | Assuming development will address both existing and future demands, no impact expected. Difficult to score until know exact details of development |
| | | ...continue to support a high proportion of highly qualified residents? | Complete removal of significant support | Reduces support | Small reduction in support | e.g. support for higher education comes at expense of further education | No impact on highly qualified residents | Provides a small amount of support | Provides support | Provide significant support | 0 | | |
| Employment | Facilitate and support employment opportunities | ...improve employment opportunities in key wards? | In key wards... - Loss of a significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Extremely poor access to transport - Very poor opportunities for developing new skills | In key wards... - Loss of a number of permanent employment opportunities provided e.g. 10-50 new jobs - Very poor access to transport - Poor opportunities for developing new skills | In key wards... - Loss of a small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Poor access to transport - Very poor opportunities for developing new skills | e.g. job opportunities at risk but not certain | No impact on employment opportunities in key wards | In key wards... - A small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Reasonable access to transport - Reasonable opportunities for developing new skills | In key wards... - Number of permanent employment opportunities provided e.g. 10-50 new jobs - Good access to transport - Good opportunities for developing new skills | In key wards... - Significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Very good access to transport - Very good opportunities for developing new skills | LOW Unemployment in borough is very low generally | ++ | Developing in more urban areas mean access to transport and skills is more likely. Although RTW is much better than Hawkhurst/Cranbrook for transport. |
| Equality | Increase social mobility and inclusion | ...improve physical activity rates for low income population groups? | A significant number of opportunities affecting the lowest income population groups missed | Opportunities missed | A small number of opportunities missed | e.g. support in one parish comes at expense of support elsewhere | No impact on physical activity rates | A small number of opportunities provided | Opportunities provided | A significant number of opportunities provided that benefit the lowest income population groups | 0 | +++ | Developing in these locations matches up with pockets of income deprivation and so increases likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces. Difficult to score until know exact details of development |
| | | ...improve social mobility problems caused by selective grammar schools? | Provision for a new grammar school | Expansion of an existing grammar school | Increase in catchment area of existing grammar school | e.g. grammar school dedicates places for low income families | No impact on selective education | Increase in catchment area of existing non-selective school | Expansion of an existing non-selective secondary school | Provision for a new non-selective secondary school | 0 | | |

| Sustainability Objective | Does the policy/ allocation/ objective..... | Score | | | | | | | | Weight | Final Score | Decision Making Criteria |
|--------------------------|---|--|---|---|---|--|---|--|--|--|-------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...provide a framework for a positive heritage strategy including enhancements in line with NPPF? | Significantly worse provision by the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Worsens provision by the historic environment for the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Prevents enhancement opportunities for and by the historic environment for one of the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Provides potential for enhancement of and by the historic environment but other priorities could hinder | No opportunities for enhancement are available. | Slight enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Significant enhancement opportunities from the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | 0 | | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population) |
| Housing | ...meet identified needs for affordable housing? | No provision made for affordable housing and demands increased significantly | No provision made for affordable housing and demands increased | No provision made for affordable housing | e.g. affordable housing needs met in one site/phase/ location at the expense of another | No relevance to affordable housing | A small proportion of affordable housing needs met | Affordable housing needs partially met | Affordable housing needs met in (or near) full | High Housing demands in borough are not being met. | | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. This strategy would not help address rural needs. Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. |
| | ...meet demand for housing suitable for older people downsizing? | No provision made for older persons housing needs and demands increased significantly | No provision made for older persons housing needs and demands increased | No provision made for older persons housing needs | e.g. older persons housing needs met in one site/phase/ location at the expense of another | No relevance to older persons housing needs | A small proportion of older persons housing needs met | Older persons housing needs partially met | Older persons housing needs met in full | High Housing demands in borough are not being met. | | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. |
| | ...meet demand for 2 and 3 bed market housing to suit expanding families? | No provision made for 2 and 3 bed housing needs and demands increased significantly | No provision made for 2 and 3 bed housing needs and demands increased | No provision made for 2 and 3 bed housing needs | e.g. 2 and 3 bed housing needs met in one site/phase/ location at the expense of another | No relevance to 2 and 3 bed housing demands | A small proportion of demand for 2 and 3 bed market housing met | Some of the demand for 2 and 3 bed market housing met | Demand for 2 and 3 bed market housing met in full | High Housing demands in borough are not being met. | + | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. |
| | ...make allowances in housing targets due to environmental constraints in the borough? | No allowances made and constraints not given weight | No allowances made and constraints given limited weight | No allowances made but constraints given moderate weight | e.g. allowances made in one location at the expense of another | Not relevant to housing targets | Limited allowances made | Some allowances made | Significant allowances made | 0 | | Urban development approach would help a little as development in RTW is outside of AONB. However, historic environment more constraining in RTW, and Cranbrook and Hawkhurst within AONB and large quantity of development here will be negative. Also, Paddock Wood flooding issues not avoided. Likely to need to release Green Belt land. |
| Land use | Protect soils, and reuse previously developed land and buildings ...protect Green Belt? | Detracts from all of the 5 purposes of the Green Belt | Detracts from 3-4 of the purposes of the Green Belt | Detracts from 1-2 of the purposes of the Green Belt | e.g. development is not on Green Belt but may benefit or detract from adjacent Green Belt | No impact upon Green Belt or impact is on an area of land that serves none of the 5 purposes of Green Belt | Respects the 5 purposes of the Green Belt | Respects the 5 purposes of the Green Belt and enhances beneficial use | Respects the 5 purposes of the Green Belt and significantly enhances beneficial use | 0 | -- | Development in GB would be needed. Coalescence of Pembury and RTW may be a problem. GB review should ensure that urban and derelict land is regenerated in preference to high quality countryside. |

| Sustainability Objective | Does the policy/ allocation/ objective..... | Score | | | | | | | | Weight | Final Score | Decision Making Criteria |
|--------------------------|---|--|--|--|---|--|--|---|--|--|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...develop on previously developed land in preference to greenfield land? | >50% of development located on greenfield land | 10%-50% of development located on greenfield land | Up to 10% of development located on greenfield land | e.g. previous use of land unknown | No impact on land type | Development entirely on previously developed land and adjacent to greenfield | Development entirely on and adjacent to previously developed land | Development located entirely on and surrounded by previously developed land | High. Housing white paper suggests great weight should be applied to suitable brownfield sites | | Developing primarily in urban areas increases likelihood of finding brownfield sites. However, extremely unlikely to be enough to enable such a large quantity of development. |
| | ...prioritise development on lower grade agricultural soils? | >20ha of development on best and most versatile soils | <20ha of development on best and most versatile soils | Development on agricultural soils of any grade | e.g. grading of agricultural soil unknown | No impact on agricultural soils or no change to soil grading | Protect agricultural soils of any grade | Protect and improve <20ha of best and most versatile soils | Protect and improve >20ha of best and most versatile soils | 0 | | Difficult to score without exact detail of locations. However, prioritising urban development reduces the risk of permanently losing high grade soils. |
| Landscape | ...protect and enhance the High Weald AONB and historic landscape? | 1) Near full or full loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/ pattern: - near completely or completely out of keeping with existing settlement | 1) Partial loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/ pattern: - out of keeping with existing settlement | 1) Degradation of: - exposed geology - gills, streams, ponds - woodland - fields and heath - routeway 2) Scale/setting/ pattern: - slightly out of keeping with existing settlement | e.g. exposed geology protected but pond degraded or one routeway diverted and another restored or improvements to settlement edge but development is still out of scale | No impact on the AONB | 1) Protection of: - exposed geology - gills, streams, ponds - routeway - woodland (W1) - fields and heath - routeway 2) Scale/setting/ pattern: - generally in keeping with existing settlement - no significant harm | 1) Protection & improvement of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath - routeway 2) Scale/setting/ pattern: - in keeping with existing settlement - no harm | 1) Protection, improvement & increase size/function of: - exposed geology - gills, streams, ponds - routeway - woodland (W2) - fields and heath - routeway 2) Scale/setting/ pattern: - in keeping with and enhances existing settlement | Great weight as per NPPF | | Urban development approach would help a little as development in RTW is outside of AONB. However, Cranbrook and Hawkhurst within AONB and large quantity of development here likely to be negative. |
| | ...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? | 1) Near full or full loss of ancient woodland 2) Near full or full loss of management opportunities or access | 1) Partial loss of ancient woodland 2) Partial loss of management opportunities or access | 1) Degradation of ancient woodland 2) Scaled down management opportunities or access | e.g. recreation management conflicts with biodiversity management | No impact on ancient woodland | 1) Protection of ancient woodland 2) Improvement to existing management opportunities or access | 1) Protection and enhancement of ancient woodland 2) Addition of management opportunities or access | 1) Protection, enhancement and improve function of ancient woodland 2) Significant addition of management opportunities or access | High AW is a finite habitat | - | Difficult to score without exact locations of development. However, NPPF para 118 suggests loss or deterioration of ancient woodland would be refused (unless benefits outweigh the loss). Recent Housing White Paper also places emphasis on protecting ancient woodland. |
| | ...strengthen Green Infrastructure? | Near full or full loss of GI and/or full loss of management opportunities | Partial loss of GI and/or partial loss of management opportunities or access | Degradation of GI and/or scaled down management opportunities or access | e.g. a combination of negative and positive impacts | No impact on GI or no net loss of GI | Protection of GI and/or improvement to existing management opportunities | Protection and enhancement of GI and/or addition of management opportunities | Protection, enhancement and increase size/function of GI and/or significant addition of management opportunities | 0 | | Difficult to score without exact detail of development locations. However, assumed that there would be no net loss of GI. |
| | ...protect and enhance landscape and townscape character and quality? | High adverse impacts | Moderate adverse impacts | Minor adverse impacts | e.g. a combination of negative and positive impacts | No visual impacts or impact on landscape and townscape character and quality | Minor positive impacts | Moderate positive impacts | High positive impacts | 0 | | Focussing a large amount of development in RTW/SB relieves some pressure on protected landscape but would put increased pressure on townscape character. Also, towns of HH and CB are both in AONB. Policy to ensure high quality and sympathetic design is required. |

| Sustainability Objective | Does the policy/ allocation/ objective..... | Score | | | | | | | | Weight | Final Score | Decision Making Criteria |
|--------------------------|--|--|---|---|---|---|---|--|---|--|---|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Noise | Reduce noise pollution | ...consider noise pollution in Important Areas for Road Noise? - Increase road noise dramatically in an IARN - Position sensitive receptors in an IARN | - Increase road noise in an IARN - Develop large number of residential housing in an IARN | - Increase road noise slightly in an IARN - Develop residential housing in an IARN | e.g. development is adjacent to an IARN and may contribute to worsening effects | No impact upon an IARN | - Reduce road noise slightly in an IARN - Provide noise mitigation for residents located in an IARN | - Reduce road noise in an IARN - Relocate number of sensitive receptors away from an IARN | - Reduce road noise dramatically in an IARN - Relocate large number of sensitive receptors away from an IARN | HIGH Great control over this issue and more certainty | - - | Areas are scattered across borough but many are in RTW where a large proportion of housing would occur. The A229 near Cranbrook also has an IARN. There is a risk that such large amount of growth would create significant movements in new locations and thus warrant a new IARN. |
| | ...consider noise pollution from aircraft and trains? - Position sensitive receptors in flight path or adjacent to main railway | - Develop residential housing in main flight path (20 flights per day or more) or adjacent to main railway | - Develop residential housing on edge of flight path (5-20 flights per day) or near to main railway | e.g. flight path subject to change | No impact upon flight path | - Provide noise mitigation for residents located in flight path or near to main railway | - Relocate number of sensitive receptors away from edge of flight path or adjacent to railway | - Relocate large number of sensitive receptors away from main flight path or adjacent to railway | 0 | Focusing large amount of development in RTW would increase likelihood of needing to build in flight path. Paddock Wood rail line is also a noise sensitive area. | | |
| Resources | Reduce the impact of resource consumption | ...prevent unsustainable demolition and rebuild projects? Demolition and rebuild required | Demolition and rebuild encouraged | Demolition and rebuild promoted slightly | e.g. demolished building is unusable and new build is extremely sustainable | Demolition and rebuild not applicable | Demolition and rebuild reduced slightly | Demolition and rebuild reduced | Demolition and rebuild prevented | 0 | ? | Difficult to score without exact detail of locations |
| | ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? Responsible sourcing/low impact materials prohibited | Responsible sourcing/low impact materials prohibited | Responsible sourcing/low impact materials strongly discouraged | Responsible sourcing/low impact materials discouraged slightly | e.g. suitable low impact/responsibly sourced material does not currently exist | Responsible sourcing/low impact materials not applicable | Responsible sourcing/low impact materials encouraged slightly | Responsible sourcing/low impact materials strongly encouraged | Responsible sourcing/low impact materials mandatory | 0 | 0 | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| Services and facilities | Improve access to and range of key services and facilities | ...support the contribution to the local economy from tourism? Tourism strongly discouraged e.g. closure of major attraction | Tourism discouraged | Tourism discouraged slightly | e.g. opening a new attraction reduces visitors to an existing attraction | Tourism not relevant | Tourism supported slightly | Tourism supported | Tourism supported strongly e.g. opening of major attraction | Low Tourism contributes a relatively small amount to local economy | | Developing in urban areas more likely to increase visitor numbers to easy to reach attractions e.g. the Pantiles |
| | | ...support superfast broadband connectivity in final 5% of the borough? Development in all of the locations of borough not connected to superfast broadband | Development in some of the locations of borough not connected to superfast broadband | Development in a few of the locations of borough not connected to superfast broadband | e.g. speed for a particular location is not known | No impact upon broadband speeds in areas of need. | Development that guarantees superfast connection in a few of the locations of borough not currently connected | Development that guarantees superfast connection in a some of the locations of borough not currently connected | Development that guarantees superfast connection in all of the locations of borough not currently connected | 0 | Majority of urban areas will already have superfast. However, there are parts of HH that do not yet have superfast. | |
| | | ...improve range of services and facilities especially in rural settlements? Loss and poor range of existing key services or facilities | Loss or poor range of existing key services or facilities | Loss or limited range of existing key services or facilities | e.g. improvements in one service and loss of another service | Not relevant to provision of services and facilities | Gain or good range of existing services or facilities | Gain or near full range of existing key services or facilities nearby | Gain or full range of existing key services or facilities and wide range of further services and facilities nearby | High. Critical issue when determining where to develop. More weight if a rural settlement. | ++ | Services in urban areas already suitable except lack of train station for CB and HH, and no secondary school for HH. |
| | | ...retail and leisure growth? (study underway) Loss and poor range of existing retail and leisure facilities | Loss or poor range of existing retail and leisure facilities | Loss or limited range of existing retail and leisure facilities | e.g. improvements in one facility and loss of another facility | Not relevant to provision of retail and leisure facilities | Gain or good range of existing retail and leisure facilities | Gain or near full range of existing retail and leisure facilities | Gain or full range of existing retail and leisure facilities and wide range of further retail and leisure facilities nearby | 0 | Sports centres and wide range of shops in all urban areas except HH. However, HH has a cinema. | |

| Sustainability Objective | Does the policy/ allocation/ objective..... | Score | | | | | | | | Weight | Final Score | Decision Making Criteria |
|--------------------------|---|--|--|---|--|---|---|--|---|--|-------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...improve access to services and facilities especially in rural settlements? | Nearest services or facilities only accessible by private car OR existing accessibility worsened significantly | Public transport needed to access services and facilities is infrequent or unreliable OR existing accessibility worsened | Key services and facilities accessible only by public transport OR existing accessibility worsened slightly | Access route undetermined | Not relevant to access to services and facilities | Key services and facilities are within desirable walking distance OR existing accessibility improved slightly | Key services and facilities are within desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved | Key services and facilities are within half the desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved significantly | High A critical issue when determining where to develop. More weight if a rural settlement. | | Developing primarily in urban areas means most services are easily accessible on foot. Although, HH and CB do not have easily accessible train station. |
| Travel | ...support priority transport projects? | Significant negative impact e.g. multiple projects inhibited | Some negative impact e.g. severe delays | Slight negative impact e.g. project delayed | e.g. one project supported at the expense of another | Priority transport projects unaffected | Minimal support e.g. project recognised or land reserved | Support given to promote one or more projects | Significant support e.g. multiple projects promoted or accelerated timescales | 0 | | Building in urban areas could help public space improvements in RTW and speed restriction projects. |
| | ...prioritise easy access to train stations within and outside the borough? | Access to train station very difficult (e.g. 10miles+ or no public transport) | Access to train station difficult (e.g. 5-10 miles or very limited public transport) | Access to train station inconvenient (e.g. 3-5 miles or limited public transport) | e.g. easy access but unlikely to be train users | Access to train stations not applicable | Convenient access to train station by private car | Convenient access to train station by public transport | Convenient access to train station by foot | 0 | | Access to train stations more likely when concentrating development in most urban areas. However, Etchingham station not easily accessible from HH without private car. Improvements to urban bus services brought about by increased development could be countered by lack of investment in rural areas (and thus associated bus services). Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport would also be better than rural areas so benefit may be small. |
| | ...improve rural bus services and retain viability of urban bus services? | Significant negative impact on bus services (e.g. removal of a bus route) | Bus services worsened (e.g. loss of multiple bus stops or several services per week) | Bus services worsened slightly (e.g. loss of one bus stop or service per week) | e.g. improvements to one service or route come at expense of another | Bus services unaffected | Opportunities to improve bus services available (e.g. new bus stop or additional service each week) | Improvements to bus services (e.g. addition of multiple bus stops or services per week) | Significant positive impact on bus services (e.g. addition of new route) | LOW Bus use is generally unpopular in borough | + | |
| | ...support opportunities for active travel including cycling and walking? | Cycling and walking discouraged e.g. 50+ less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. 10 less cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | |
| Waste | ...support continued decline in household waste reduction? | Creates barriers to household waste reduction e.g. large number of new homes with no commitment to reduction | Likely to negatively affect the continued decline in household waste e.g. addition of significant number of new homes | Maintains status quo | e.g. causes increase in one stream of household waste and decline in another | Household waste unaffected | Household waste reduction considered | Some commitment and ideas for supporting household waste reduction | Strong commitment and innovative ideas for supporting household waste reduction | 0 | | Likely to be an increase with large quantities of development. Assumption that a LP policy would prevent very large quantities |
| | ...improve rates of household waste diverted from landfill? | 100% waste to landfill | Approximately 50% waste to landfill | Some waste to landfill e.g. 10% | e.g. reduced waste to landfill possible but may not be achieved in practise e.g. quantity of waste produced will depend on reputation of contractor used | No waste will occur or household waste not relevant | Some waste diverted from landfill e.g. 10% | Approximately 50% waste diverted from landfill | Zero waste to landfill can be achieved. | 0 | ? | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| | ...reduce construction waste? | Construction waste increased significantly | Construction waste increased | Construction waste increased slightly | e.g. impact upon consumption unclear | No construction waste will occur or construction waste not relevant | Construction waste decreased slightly | Construction waste decreased | Construction waste decreased significantly | 0 | | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| Water | ...reduce water consumption rates? | Significantly worsens existing consumption rates | Worsens existing consumption rates | Maintains status quo | e.g. impact upon consumption unclear | No impact on water consumption | Consumption rates reduced to national average | Consumption rates reduced to Building Regulations requirement of 125 lpppd | Consumption rates reduced to optional standard of 110 lpppd | 0 | | This aspect would be considered through DM policy. Not possible to score at strategy level. It is recommended that the government's higher optional technical standard is implemented. |
| | ...manage impacts from flooding? | Significantly worsens impacts identified from SFRA | Worsens impacts identified from SFRA | Maintains status quo | e.g. impacts are unknown | No change to flood impacts | Improves impacts from flooding | Significantly improves impacts from flooding | Eliminates impacts from flooding | 0 | - | Developing such a large quantity of greenfield land could worsen impacts but difficult to score without exact |

| Sustainability Objective | Does the policy/ allocation/ objective..... | Score | | | | | | | | Weight | Final Score | Decision Making Criteria |
|--|--|---|--|--|--|--|--|--|----------------------------|--------|---|--------------------------|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| ...exacerbate flood risk on or off site? | Flood zone 3b and exception test fail | Flood zone 3a and exception test fail | Flood zone 2 and exception test fail | e.g. risk is unknown without further detail | No impact on flood risk | Flood zone 3 but exception test pass and improvements proposed e.g. SUDs | Flood zone 2 but exception test pass and improvements proposed e.g. SUDs | Flood zone 1 | High Legislatively driven. | | detail of locations. Majority of development locations would be acceptable. However, some locations around Paddock Wood are in flood zones 3a and 3b and would fail the exception test. | |
| ...support improvements in groundwater quality? | High risk of contamination to groundwater e.g. source protection Zone 1 and previously contaminated land | Medium risk of contamination to groundwater e.g. source protection Zone 2 and possible previously contaminated land | Some risk of contamination to groundwater e.g. in source protection Zone 3 and unknown existing land contamination | e.g. risk is unknown without further investigation | No impact upon groundwater quality | Some support for improvements in groundwater quality | Support for improvements in groundwater quality | Significant support for improvements in groundwater quality e.g. prevention of intensive agriculture in source protection zone 1 | 0 | | Difficult to score without exact detail of locations. However, it is assumed that there would be no development that would create contamination risk to a SPZ. | |
| ...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities? | Pressures increased significantly | Pressures increased | Pressures increased slightly | e.g. agricultural pressures reduced but water industry pressures increased | No impact upon pressures on water bodies | Pressures reduced slightly | Pressures reduced | Pressures reduced significantly | 0 | | Building a significant amount of residential housing in the borough is unlikely to create additional pressure from the practises that cause most damage (agriculture, water industry and rural land management). Industrial development would require more stringent controls. This is a location specific aspect to be considered through DM policy. | |

Option 2 - GS2 - Semi-dispersed Growth

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|---|---|---|--|--|---|---|--|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Air | Reduce air pollution | | | | | | | | | | | |
| | ...help meet NO2 and PM10 targets along the A26 in Royal Tunbridge Wells? | Significantly increases traffic in AQMA e.g. >50 vehicles per day | Increases traffic in AQMA e.g. 10 - 50 vehicles per day | Slightly increases traffic in AQMA e.g. <10 vehicles per day | e.g. reduces private car use but increases business or commercial traffic. | Neither increases nor reduces traffic in AQMA | Slightly reduces traffic in AQMA e.g. <10 vehicles per day | Reduces traffic in AQMA e.g. 10-50 vehicles per day | Significantly reduces traffic in AQMA e.g. >50 vehicles per day | High Legislatively driven. | | Concentrating most development in RTW and SB means increased traffic in AQMA. |
| | ...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options? | Removes support for improving air quality with significant negative consequences | Removes support for improving air quality | Removes support for improving air quality with minimal negative consequences | e.g. supports local car club but also increases parking for private cars | Neither offers nor removes support for improving air quality | Provides support for improving air quality with minimal benefits | Provides support for improving air quality | Provides support for improving air quality with significant benefits | 0 | | Development in RTW/SB could collect Section 106 money for car club etc. but service still bedding in. Also, EV charge points could be added but not many people drive EV yet so would take time to see any benefit. Measures could be introduced to other main settlements and larger villages for the first time. This would be beneficial for isolated villages with heavy reliance on private car. |
| | ...promote forms of active travel including cycling and walking? | Cycling and walking discouraged e.g. >50 less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. <10 cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport in more urban areas is already relatively good so benefit may be small. If development in villages was coupled with improvements to local services and facilities and active transport infrastructure a benefit may be seen as these areas are currently heavily reliant on private car. Strategy does not specify exact locations for sensitive receptors. However, with growth focussed in RTW and SB and support for improving air quality in it's infancy, it seems probable that existing sensitive receptors will experience higher rates of poor air quality |
| | ...help reduce premature deaths from poor air quality (cause by PM2.5)? | Sensitive receptors inside AQMA | Sensitive receptors in area with busy traffic | Sensitive receptors in area with some traffic | e.g. relocates sensitive receptors into area of equally poor air quality | Health of sensitive receptors unchanged | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors in area with significantly less traffic and outside AQMA | High Lives at stake. | | |
| Biodiversity | 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)? | Full loss of a site of biodiversity value | Partial loss of a site of biodiversity value | Degradation of a site of biodiversity value | e.g. improvements to one site come at expense of another site | No impact upon sites of biodiversity value | Protection of site of biodiversity value | Protect and improve site of biodiversity value | Protect, improve and increase size/function of site of biodiversity value | 0 | | Such a large quantity of development across the borough is highly likely to cause losses for biodiversity. Urban focus may help but brownfield sites are limited. It is recommended that mitigation schemes are devised. |
| | ...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations? | Likely significant effects definite, no effective mitigation available | Likely significant effects probable, mitigation may be ineffective | Likely significant effects possible, mitigation likely to be effective | e.g. effectiveness of mitigation available to prevent likely significant effects is unknown | No impact upon the Ashdown forest | No or insignificant impact upon the Ashdown Forest and provision of some green space | No or insignificant impact upon the Ashdown Forest disturbance and provision of SAMMS | No or insignificant impact upon the Ashdown Forest disturbance and provision of SANGS | High Ashdown Forest is of international significance | | Focussing a large amount of development in RTW makes impacts upon the Ashdown Forest more likely. Funding for SAMM could be collected though. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|---|--|---|---|---|---|---|--|---|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...support work to improve condition of SSSIs? | Full loss of a SSSI | Partial loss of a SSSI | Degradation of a SSSI | e.g. a combination of negative and positive impacts | Neither improves nor contributes to a decline in the condition of SSSIs | Protection of SSSI | Protect and improve | Protect, improve and increase size/function | High SSSIs are of national significance | | Difficult to score until know exact location of development but assumed that all SSSI in borough would be protected as a minimum. |
| | ...help support existing business and the growth of new businesses? | - Loss of >500m2 floor space/premises suitable for new businesses - Extremely slow broadband - Extremely limited transport options - Extremely limited availability of staff | - Loss of 250m2 - 500m2 floor space/premises suitable for new businesses - Very slow broadband speed - Very limited transport options - Limited availability of staff | - Loss of up to 250m2 floor space/premises suitable for new businesses - Slow broadband speed - Limited transport options - Limited availability of suitable staff | e.g. suitable premises but no fast broadband | No impact on new business survival | - Gain of up to 250m2 floor space/premises suitable for new businesses - Reasonable broadband speed - Small range of transport options - Small range of suitable staff | - Gain of 250m2 - 500m2 floor space/premises suitable for new businesses - Good broadband speed - Wide range of transport options - Wide range of suitable staff | - Gain of >500m2 floor space/premises suitable for new businesses - Fast broadband speed - Very wide range of transport options - Very wide range of suitable staff | Less weight than national average (see Economic Needs Assessment) | | 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. |
| Business Growth | Encourage business growth and competitiveness | Loss of > 500m2 floor space | Loss of 250m2 - 500m2 floor space | Loss of < 250m2 floor space | e.g. support for one industry associated with a loss for another industry | No impact on wholesale, health and finance industries | Gain of < 250m2 floor space | Gain of 250m2 - 500m2 floor space | Gain of > 500m2 floor space | 0 | + | Need to know what type of development is proposed to score accurately. Development in urban areas is likely to support these industries (staff & transport). However, mixed picture as loss of economic floor space may occur in preference to housing whereas construction-related activities are likely to be supported by the significant development needed. Housing demands are extremely high and residential development is a more viable option for developers. It seems likely that some economic floor space will be sacrificed (as has been the trend up to now). Developing in the urban areas is likely to exacerbate this trend as more economic floor space is located here. A policy would be needed to proven this happening. |
| | ...prevent loss of economic floor space in preference for housing and other non employment generating uses within Key Employment Areas and other well located employment sites? | > 500m2 economic floor space lost in preference for housing | 250m2 - 500m2 economic floor space lost in preference for housing | < 250m2 economic floor space lost in preference for housing | e.g. viability of existing economic floor space unknown | No impact on economic floor space or economic floor space lost in non-viable location | Housing development preserves existing economic floor space | Housing development preserves existing or provides for more economic floor space | Housing development preserves existing and provides for additional economic floor space | 0 | | Developing in the urban areas is likely to exacerbate this trend as more economic floor space is located here. A policy would be needed to proven this happening. |
| | ...recognise and help develop the rural economy? | Rural economy lost and prevented from developing in the future | Loss for the rural economy | Rural economy diminished | e.g. support for one industry associated with a loss for another industry | No impact on the rural economy | Rural economy protected | Rural economy protected and expanded | Rural economy protected and significantly expanded | 0 | | A small amount of development in rural settlements could help the rural economy. |
| Climate Change & Energy | Reduce carbon footprint and adapt to predicted changes | Adaptation measures excluded with significant negative consequences | Adaptation measures excluded | Adaptation measures excluded but with minimal negative consequences | Adaptation measures have negative consequences e.g. drought resilient plants are preferable to invasive species | Adaptation is not possible or no climate change pressures exist in that location | Adaptation measures incorporated but with minimal benefits | Adaptation measures incorporated | Adaptation measures incorporated with significant benefits | 0 | -- | Difficult to score until know exact details of development |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|--|--|--|---|---|---|--|---|----------------------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...support reduction in carbon and energy so targets are consistently met? [Nb. short term effects e.g. construction related are considered by Objective 15: Resources] | Increases carbon significantly compromising reduction target | Increases carbon making reduction target difficult to achieve | Maintains status quo. Increases carbon slightly but reduction target is still achievable | e.g. reduces carbon from domestic sources but increases carbon from transport | Neither increases nor reduces carbon | Reduces carbon but unlikely to meet annual target | Meets annual carbon reduction targets | Exceeds annual carbon reduction targets | High Targets are currently not being met. | | Building a large number of new homes is likely to increase carbon and energy demands significantly. Developing in rural locations will not help reduce transport related carbon. |
| | ...support opportunities to utilise biomass in the borough? | Biomass opportunities discouraged with significant negative consequences | Biomass opportunities discouraged | Biomass opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages biomass | Biomass opportunities supported | Biomass opportunities supported and realised | Biomass opportunities supported and realised with significant benefits | 0 | | Difficult to score until know exact details of development. However, developing predominantly in urban areas will make use of biomass difficult as this is where air quality is poorest. |
| | ...support opportunities to install community heating schemes? | Community heating opportunities discouraged with significant negative consequences | Community heating opportunities discouraged | Community heating opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages community heating | Community heating opportunities supported | Community heating opportunities supported and realised | Community heating opportunities supported and realised with significant benefits | Low Opportunities are limited | | RTW was identified as having some potential for community heating in the pre-feasibility study completed by KCC. However, further studies would be required. |
| Deprivation | Reduce poverty and assist with regeneration | ...address pockets of deprivation and encourage regeneration? | Significant regeneration diverted away from a pocket of severe deprivation | Some regeneration activates diverted away from pocket of deprivation | Small amount of regeneration activates diverted away from pockets of deprivation | e.g. regeneration adjacent to a pocket of deprivation may trigger future regeneration but there is no guarantee | No impact upon pockets of deprivation | Small amount of regeneration in a pocket of deprivation | Some regeneration in a pocket of deprivation | Significant regeneration in a pocket of severe deprivation e.g. major housing or retail development | 0 | Pockets of deprivation are concentrated in urban areas. Developing here increases the likelihood that these could be improved. |
| | | ...reduce rates of fuel poverty? | Energy demand increase of >50% | Energy demand increase of 10% - 50% | Energy demand increase of <10% | e.g. energy saving principles incorporated but users unlikely to be affected by fuel poverty | No impact on fuel poverty | Energy reductions of <10% | Energy reductions of 10% - 50% | Energy reductions of >50% | 0 | Difficult to score until know exact details of development. Recommend that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. Could be incorporated into affordability criteria for new homes. |
| Education | Improve educational attainment and enhance the skills base | ...meet demand for school places? | Will increase demand by >50% | Will increase demand by 10-50% | Will increase demand by <10% | New school proposed in long term but impact of demand will be felt in short term | No impact on school places or demand for new places can be accommodated | Will reduce demand by <10% | Will reduce demand by 10-50% | Will reduce demand by >50% | HIGH More pressing need | Assuming development will address both existing and future demands, no impact expected. |
| | | ...continue to support a high proportion of highly qualified residents? | Complete removal of significant support | Reduces support | Small reduction in support | e.g. support for higher education comes at expense of further education | No impact on highly qualified residents | Provides a small amount of support | Provides support | Provide significant support | 0 | Difficult to score until know exact details of development |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|--|--|---|---|--|---|--|--|---|--|--------------------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Employment | Facilitate and support employment opportunities | ...improving employment opportunities in key wards? | In key wards... - Loss of a significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Extremely poor access to transport - Very poor opportunities for developing new skills | In key wards... - Loss of a number of permanent employment opportunities provided e.g. 10-50 new jobs - Very poor access to transport - Poor opportunities for developing new skills | In key wards... - Loss of a small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Poor access to transport - Very poor opportunities for developing new skills | e.g. job opportunities at risk but not certain | No impact on employment opportunities in key wards | In key wards... - A small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Reasonable access to transport - Reasonable opportunities for developing new skills | In key wards... - Number of permanent employment opportunities provided e.g. 10-50 new jobs - Good access to transport - Good opportunities for developing new skills | In key wards... - Significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Very good access to transport - Very good opportunities for developing new skills | LOW Unemployment in borough is very low generally | ++ | Developing in more urban areas mean access to transport and skills is more likely. Although RTW is much better than Hawkhurst/Cranbrook for transport. |
| Equality | Increase social mobility and inclusion | ...improve physical activity rates for low income population groups? | A significant number of opportunities affecting the lowest income population groups missed | Opportunities missed | A small number of opportunities missed | e.g. support in one parish comes at expense of support elsewhere | No impact on physical activity rates | A small number of opportunities provided | Opportunities provided | A significant number of opportunities provided that benefit the lowest income population groups | 0 | +++ | Developing in these locations matches up with pockets of income deprivation and so increases likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces. |
| | | ...improve social mobility problems caused by selective grammar schools? | Provision for a new grammar school | Expansion of an existing grammar school | Increase in catchment area of existing grammar school | e.g. grammar school dedicates places for low income families | No impact on selective education | Increase in catchment area of existing non-selective school | Expansion of an existing non-selective secondary school | Provision for a new non-selective secondary school | 0 | | |
| Health | Improve health and wellbeing, and reduce health inequalities | ...meet demand for elderly care services? | Does not meet existing demand and significantly increases future demand | Does not meet existing demand and increases future demand | Does not meet existing demand | e.g. meets existing demand at expense of future demand or vice versa | Does not impact upon elderly care services | Meets existing demand | Meetings existing demand and reduces future demand | Meet existing demand and significantly reduces future demand | HIGH Growing elderly population | | Difficult to score until know exact details of development |
| | | ...improve physical activity rates for at risk population groups? | Significantly reduces changes for improvement of physical activity rates for at risk populations | Reduces chances for improvement of physical activity rates for at risk populations | Slightly reduces chances for improvement of physical activity rates for at risk populations | e.g. increasing physical activity rates for some at risk populations comes at the expense of other at risk populations | Neither increases nor reduces physical activity rates | Slightly increases physical activity rates for at risk populations | Increases physical activity rates for at risk populations | Significantly increases physical activity rates for at risk populations | 0 | + | The majority of inactive groups are located in main settlements (but not all) so developing here increases the likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces. All the pockets are located in main settlements (except Benenden and Sandhurst) so developing here increases the likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces. |
| | | ...address pockets of health deprivation? | Significantly reduces changes for improvement of pockets of health deprivation | Reduces chances for improvement of pockets of health deprivation | Slightly reduces chances for improvement of pockets of health deprivation | e.g. reduces or improves one area of health deprivation at the expense of a different area | Does not impact upon pockets of health deprivation | Will slightly improve or reduce pockets of health deprivation | Will improve or reduce pockets of health deprivation | Will significantly improve or reduce pockets of health deprivation | 0 | | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|---|---|---|---|--|--|--|---|--|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers? | Removes provision of specialist health care or support services and causes significant problems | Removes provision of specialist health care or support services | Removes provision of specialist health care or support services, but accessible services are still available | e.g. helps one illness at the expense of another illness | Does not impact upon specialist health care or support services | Helps with provision of specialist health care or support services but with minimal benefits | Helps with provision of specialist health care or support services | Significantly helps with provision of specialist health care or support services | 0 | | Difficult to score until know exact details of development |
| | ...meet need for green open space and recreation facilities? | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is both too far (more than twice recommended distance) and/or too small (less than half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either too far (e.g. twice recommended distance) and/or too small (e.g. half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either slightly too far (less than twice recommended distance) and/or slightly too small (more than half recommended size) | e.g. Accessible Natural Greenspace is allocated to one population at the expense of a different population | Green open space and recreation facilities not relevant | Meets 1 or 2 Accessible Natural Greenspace Standards | Meets 3 or 4 Accessible Natural Greenspace Standards | Meets all Accessible Natural Greenspace Standards | HIGH TWBC is already behind on these standards | | Assumption that development does not take away existing accessible green space, however, still seems unlikely that high demands for housing will provide sufficient new green space to meet these standards (which the Borough is already behind on). Also, urban areas are less likely to have green open space |
| | ...ensure residents can access heritage assets? | Significantly worsens or prevents access to heritage assets (e.g. severance of access route) | Worsens access to heritage assets (e.g. removes pedestrian access) | Slightly worsens access to heritage assets (e.g. pedestrian access route lengthened) | e.g. access is possible but other factors may prevent visits | Does not impact upon access to heritage assets | Slightly improves access to heritage asset (e.g. pedestrian access route shortened) | Improves access to heritage assets (e.g. provision for new modes of travel) | Significantly improves access to heritage assets (e.g. addition of new access route) | 0 | | Best transport links are from/to main settlements. Although, Hawkhurst and Cranbrook not as good as RTW. |
| Heritage | Preserve and enhance historical and cultural heritage assets ...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance? | Significantly fails to protect, e.g. total demolition of a heritage asset, complete loss a significant contributor in historic area, complete loss of archaeological site, complete loss of element of setting which forms an important part of its significance. | Fails to protect, e.g. partial demolition of a heritage asset, removal of a part of a heritage asset that contributes strongly to significance, partial loss of element of setting that forms part of its significance. | Protection compromised, e.g., causes less than significant harm by partial demolition, removal of part of a heritage asset, or a structure that forms part of its setting. | Protection or enhancement possible but other policies could hinder, e.g. green belt designation, AONB, housing quotas, requirements for commercial use, potential for preventing reuse of historic buildings at risk. | No impact. Does not prevent or cause harm e.g. no impact on the special architectural or historic character of a building, structure or area, or any impact on archaeology | Protects heritage assets from harm or deterioration e.g. allows reuse of heritage assets which prevents deterioration or further harm, stabilises condition of heritage assets, a use which would allow for retention of setting, enables long term appropriate use of asset | Protects and enhances significance, e.g. allows restoration of historic features, setting, allows interpretation, removes detractors to its significance, enables long term optimum viable use | Provides significant enhancement e.g. use which allows for its retention if redundant, a complete restoration of a building at risk, complete restoration of an important part of a conservation area, removal of significantly harmful detractors. | High Assets and settings are often finite or hard to restore once lost | - | Focusing on built up areas would put pressure on the historic environment especially in RTW |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria | | | |
|--------------------------|---|--|---|---|---|--|---|--|--|---|--|--|--|--|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | | | |
| | ...provide a framework for a positive heritage strategy including enhancements in line with NPPF? | Significantly worsens provision by the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Worsens provision by the historic environment for the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Prevents enhancement opportunities for and by the historic environment for one of the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Provides potential for enhancement of and by the historic environment but other priorities could hinder | No opportunities for enhancement are available. | Slight enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Significant enhancement opportunities from the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | 0 | | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population) | | | |
| Housing | Provide sufficient housing to meet identified needs | ...meet identified needs for affordable housing? | ...meet demand for housing suitable for older people downsizing? | ...meet demand for 2 and 3 bed market housing to suit expanding families? | ...make allowances in housing targets due to environmental constraints in the borough? | No provision made for affordable housing and demands increased significantly | No provision made for affordable housing and demands increased | No provision made for affordable housing | e.g. affordable housing needs met in one site/phase/ location at the expense of another | No relevance to affordable housing | A small proportion of affordable housing needs met | Affordable housing needs partially met | Affordable housing needs met in (or near) full | High Housing demands in borough are not being met. | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs but this strategy also would help address rural needs Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. |
| | | ...meet demand for 2 and 3 bed market housing to suit expanding families? | No provision made for 2 and 3 bed housing needs and demands increased significantly | No provision made for 2 and 3 bed housing needs and demands increased | No provision made for 2 and 3 bed housing needs | e.g. 2 and 3 bed housing needs met in one site/phase/ location at the expense of another | No relevance to 2 and 3 bed housing demands | A small proportion of demand for 2 and 3 bed market housing met | Some of the demand for 2 and 3 bed market housing met | Demand for 2 and 3 bed market housing met in full | High Housing demands in borough are not being met. | ++ | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. | | |
| | | ...make allowances in housing targets due to environmental constraints in the borough? | No allowances made and constraints not given weight | No allowances made and constraints given limited weight | No allowances made but constraints given moderate weight | e.g. allowances made in one location at the expense of another | Not relevant to housing targets | Limited allowances made | Some allowances made | Significant allowances made | 0 | | Urban development approach would help a little as development in RTW is outside of AONB. However, historic environment more constraining in RTW, and Cranbrook and Hawkhurst within AONB and large quantity of development here will be negative. Also, Paddock Wood flooding issues not avoided. Likely to need to release Green Belt land. | | |
| | | ...make allowances in housing targets due to environmental constraints in the borough? | No allowances made and constraints not given weight | No allowances made and constraints given limited weight | No allowances made but constraints given moderate weight | e.g. allowances made in one location at the expense of another | Not relevant to housing targets | Limited allowances made | Some allowances made | Significant allowances made | 0 | | Urban development approach would help a little as development in RTW is outside of AONB. However, historic environment more constraining in RTW, and Cranbrook and Hawkhurst within AONB and large quantity of development here will be negative. Also, Paddock Wood flooding issues not avoided. Likely to need to release Green Belt land. | | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|---|---|---|---|---|--|---|--|---|---|--|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Land use | ...protect Green Belt? | Development would detract from all of the 5 purposes of the Green Belt | Development would detract from 3-4 of the purposes of the Green Belt | Development would detract from 1-2 of the purposes of the Green Belt | e.g. development is not on Green Belt but may benefit or detract from adjacent Green Belt | No impact upon Green Belt or impact is on an area of land that serves none of the 5 purposes of Green Belt | Development would respect the 5 purposes of the Green Belt | Development would respect the 5 purposes of the Green Belt and enhances beneficial use | Development would respect the 5 purposes of the Green Belt and significantly enhances beneficial use | 0 | | Development in GB would be needed. Coalescence of settlements may be a problem. GB review should ensure that urban and derelict land is regenerated in preference to high quality countryside. | |
| | Protect soils, and reuse previously developed land and buildings | ...develop on previously developed land in preference to greenfield land? | >50% of development located on greenfield land | 10%-50% of development located on greenfield land | Up to 10% of development located on greenfield land | e.g. previous use of land unknown | No impact on land type | Development entirely on previously development land and adjacent to greenfield | Development entirely on and adjacent to previously development land | Development located entirely on and surrounded by previously developed land | High. Housing white paper suggests great weight should be applied to suitable b/f | --- | Developing primarily in urban areas increases likelihood of finding brownfield sites. However, extremely unlikely to be enough to enable such a large quantity of development. |
| | | ...prioritise development on lower grade agricultural soils? | >20ha of development on best and most versatile soils | <20ha of development on best and most versatile soils | Development on agricultural soils of any grade | e.g. grading of agricultural soil unknown | No impact on agricultural soils or no change to soil grading | Protect agricultural soils of any grade | Protect and improve <20ha of best and most versatile soils | Protect and improve >20ha of best and most versatile soils | 0 | | Difficult to score without exact detail of locations. Prioritising urban development reduces the risk of permanently losing high grade soils. However, strategy allows for rural development onto soils of unknown grading. |
| Landscape | Protect and enhance landscape and townscape | ...protect and enhance the High Weald AONB and historic landscape? | 1) Near full or full loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/pattern: - near completely or completely out of keeping with existing settlement | 1) Partial loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/pattern: - out of keeping with existing settlement | 1) Degradation of: - exposed geology - gills, streams, ponds - woodland - fields and heath - routeway 2) Scale/setting/pattern: - slightly out of keeping with existing settlement | e.g. exposed geology protected but pond degraded or one routeway diverted and another restored or improvements to settlement edge but development is still out of scale | No impact on the AONB | 1) Protection of: - exposed geology - gills, streams, ponds - routeway - woodland (W1) - fields and heath 2) Scale/setting/pattern: - generally in keeping with existing settlement - no significant harm | 1) Protection & improvement of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath - routeway 2) Scale/setting/pattern: - in keeping with existing settlement - no harm | 1) Protection, improvement & increase size/function of: - exposed geology - gills, streams, ponds - routeway - woodland (W2) - fields and heath - routeway 2) Scale/setting/pattern: - in keeping with and enhances existing settlement | Great weight as per NPPF | -- | Urban development approach would help a little as development in RTW is outside of AONB. However, Cranbrook and Hawkhurst within AONB and large quantity of development here likely to be negative. Also, many rural settlements are within the AONB and highly sensitive. |
| | | ...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? | 1) Near full or full loss of ancient woodland 2) Near full or full loss of management opportunities or access | 1) Partial loss of ancient woodland 2) Partial loss of management opportunities or access | 1) Degradation of ancient woodland 2) Scaled down management opportunities or access | e.g. recreation management conflicts with biodiversity management | No impact on ancient woodland | 1) Protection of ancient woodland 2) Improvement to existing management opportunities or access | 1) Protection and enhancement of ancient woodland 2) Addition of management opportunities or access | 1) Protection, enhancement and improve function of ancient woodland 2) Significant addition of management opportunities or access | High AW is a finite habitat | | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|---|---|--|---|--|---|---|---|-------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...strengthen Green Infrastructure? | Near full or full loss of GI and/or full loss of management opportunities | Partial loss of GI and/or partial loss of management opportunities or access | Degradation of GI and/or scaled down management opportunities or access | e.g. a combination of negative and positive impacts | No impact on GI or no net loss of GI | Protection of GI and/or improvement to existing management opportunities | Protection and enhancement of GI and/or addition of management opportunities | Protection, enhancement and increase size/function of GI and/or significant addition of management opportunities | 0 | | Difficult to score without exact detail of development locations. However, assumed that there would be no net loss of GI. |
| | ...protect and enhance landscape and townscape character and quality? | High adverse impacts | Moderate adverse impacts | Minor adverse impacts | e.g. a combination of negative and positive impacts | No visual impacts or impact on landscape and townscape character and quality | Minor positive impacts | Moderate positive impacts | High positive impacts | 0 | | Focussing a large amount of development in RTW/SB relieves some pressure on protected landscape but would put increased pressure on townscape character. Also, towns of HH and CB are both in AONB. Policy to ensure high quality and sympathetic design is required. Blending development with the character of rural locations will be more challenging. |
| Noise | Reduce noise pollution | ...consider noise pollution in Important Areas for Road Noise? - Increase road noise dramatically in an IARN - Position sensitive receptors in an IARN | ...consider noise pollution from aircraft and trains? - Increase road noise in an IARN - Develop large number of residential housing in an IARN - Develop residential housing in main flight path (20 flights per day or more) or adjacent to main railway | ...consider noise pollution in Important Areas for Road Noise? - Increase road noise slightly in an IARN - Develop residential housing in an IARN | ...consider noise pollution from aircraft and trains? e.g. development is adjacent to an IARN and may contribute to worsening effects e.g. flight path subject to change | No impact upon an IARN No impact upon flight path | ...consider noise pollution in Important Areas for Road Noise? - Reduce road noise slightly in an IARN - Provide noise mitigation for residents located in an IARN | ...consider noise pollution from aircraft and trains? - Reduce road noise in an IARN - Relocate number of sensitive receptors away from an IARN | ...consider noise pollution from aircraft and trains? - Reduce road noise dramatically in an IARN - Relocate large number of sensitive receptors away from an IARN | HIGH Great control over this issue and more certainty | | 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 IARNs. There is a risk that such large amount of growth would create significant movements in new locations and thus warrant a new IARN. Focusing large amount of development in RTW would increase likelihood of needing to build in flight path. Paddock Wood rail line is also a noise sensitive area. Rusthall currently has 20 or more flights per day. |
| Resources | Reduce the impact of resource consumption | ...prevent unsustainable demolition and rebuild projects? Demolition and rebuild required | ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? Responsible sourcing/low impact materials prohibited | ...prevent unsustainable demolition and rebuild projects? Demolition and rebuild encouraged | ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? Responsible sourcing/low impact materials discouraged slightly | e.g. demolished building is unusable and new build is extremely sustainable e.g. suitable low impact/responsibly sourced material does not currently exist | Demolition and rebuild not applicable Responsible sourcing/low impact materials not applicable | ...prevent unsustainable demolition and rebuild projects? Demolition and rebuild reduced | ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? Responsible sourcing/low impact materials strongly encouraged | 0 0 | | Difficult to score without exact detail of locations This aspect would be considered through DM policy. Not possible to score at strategy level. |
| Services and facilities | Improve access to and range of key services and facilities | ...support the contribution to the local economy from tourism? Tourism strongly discouraged e.g. closure of major attraction | ...support the contribution to the local economy from tourism? Tourism discouraged | ...support the contribution to the local economy from tourism? Tourism discouraged slightly | ...support the contribution to the local economy from tourism? e.g. opening a new attraction reduces visitors to an existing attraction | Tourism not relevant | Tourism supported slightly | ...support the contribution to the local economy from tourism? Tourism supported | ...support the contribution to the local economy from tourism? Tourism supported strongly e.g. opening of major attraction | Low Tourism contributes a relatively small amount to local economy | - | Developing in urban areas more likely to increase visitor numbers to easy to reach attractions. Developing in rural areas may increase car based visitors to more remote attractions e.g. Scotney/Sissinghurst Castle, |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|--|---|--|--|---|--|---|--|-------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | | | | | | | | | | | | Bedgebury |
| | ...support superfast broadband connectivity in final 5% of the borough? | Development in all of the locations of borough not connected to superfast broadband | Development in some of the locations of borough not connected to superfast broadband | Development in a few of the locations of borough not connected to superfast broadband | e.g. speed for a particular location is not known | No impact upon broadband speeds in areas of need. | Development that guarantees superfast connection in a few of the locations of borough not currently connected | Development that guarantees superfast connection in a some of the locations of borough not currently connected | Development that guarantees superfast connection in all of the locations of borough not currently connected | 0 | | Majority of urban areas will already have superfast. However, there are parts of HH, Rusthall and Lamberhurst that do not yet have superfast. |
| | ...improve range of services and facilities especially in rural settlements? | Loss and poor range of existing key services or facilities | Loss or poor range of existing key services or facilities | Loss or limited range of existing key services or facilities | e.g. improvements in one service and loss of another service | Not relevant to provision of services and facilities | Gain or good range of existing services or facilities | Gain or near full range of existing key services or facilities nearby | Gain or full range of existing key services or facilities and wide range of further services and facilities nearby | High A critical issue when determining where to develop. More weight if a rural settlement. | | Services in urban areas already suitable except lack of train station for CB and HH, and no secondary school for HH. Developing in the larger rural settlements would be constrained by lack of services such as secondary school, supermarket and doctors surgery e.g. Lamberhurst, Goudhurst, Brenchley |
| | ...retail and leisure growth? (study underway) | Loss and poor range of existing retail and leisure facilities | Loss or poor range of existing retail and leisure facilities | Loss or limited range of existing retail and leisure facilities | e.g. improvements in one facility and loss of another facility | Not relevant to provision of retail and leisure facilities | Gain or good range of existing retail and leisure facilities | Gain or near full range of existing retail and leisure facilities | Gain or full range of existing retail and leisure facilities and wide range of further retail and leisure facilities nearby | 0 | | Sports centres and wide range of shops in all urban areas except HH. However, HH has a cinema. |
| | ...improve access to services and facilities especially in rural settlements? | Nearest services or facilities only accessible by private car OR existing accessibility worsened significantly | Public transport needed to access services and facilities is infrequent or unreliable OR existing accessibility worsened | Key services and facilities accessible only by public transport OR existing accessibility worsened slightly | Access route undetermined | Not relevant to access to services and facilities | Key services and facilities are within desirable walking distance OR existing accessibility improved slightly | Key services and facilities are within desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved | Key services and facilities are within half the desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved significantly | High A critical issue when determining where to develop. More weight if a rural settlement. | | Developing primarily in urban areas mean most services are easily accessible on foot. Although, HH and CB do not have easily accessible train station. Also, large rural settlements are lacking in some services and thus travel is necessary. |
| Travel | Improve travel choice and reduce the need to travel by private vehicle | | | | | | | | | | | |
| | ...support priority transport projects? | Significant negative impact e.g. multiple projects inhibited | Some negative impact e.g. severe delays | Slight negative impact e.g. project delayed | e.g. one project supported at the expense of another | Priority transport projects unaffected | Minimal support e.g. project recognised or land reserved | Support given to promote one or more projects | Significant support e.g. multiple projects promoted or accelerated timescales | 0 | | Building in urban areas could help public space improvements in RTW and speed restriction projects. |
| | ...prioritise easy access to train stations within and outside the borough? | Access to train station very difficult (e.g. 10miles+ or no public transport) | Access to train station difficult (e.g. 5-10 miles or very limited public transport) | Access to train station inconvenient (e.g. 3-5 miles or limited public transport) | e.g. easy access but unlikely to be train users | Access to train stations not applicable | Convenient access to train station by private car | Convenient access to train station by public transport | Convenient access to train station by foot | 0 | | Access to train stations more likely when concentrating development in most urban areas. However, rail stations not easily accessible from larger rural settlements without private car e.g. Goudhurst to Paddock Wood |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|---|---|--|---|---|---|---|--|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...improve rural bus services and retain viability of urban bus services? | Significant negative impact on bus services (e.g. removal of a bus route) | Bus services worsened (e.g. loss of multiple bus stops or several services per week) | Bus services worsened slightly (e.g. loss of one bus stop or service per week) | e.g. improvements to one service or route come at expense of another | Bus services unaffected | Opportunities to improve bus services available (e.g. new bus stop or additional service each week) | Improvements to bus services (e.g. addition of multiple bus stops or services per week) | Significant positive impact on bus services (e.g. addition of new route) | LOW Bus use is generally unpopular in borough | | Improvements to urban bus services brought about by increased development will be accompanied by potential improvements in some of the larger rural settlements as growth is also directed to these locations. Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport would also be better than rural areas so benefit may be small. Also, in rural settlements reliance on private car to access services may discourage active travel. |
| | ...support opportunities for active travel including cycling and walking? | Cycling and walking discouraged e.g. 50+ less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. 10 less cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | |
| Waste | Reduce waste generation and disposal | Creates barriers to household waste reduction e.g. large number of new homes with no commitment to reduction | Likely to negatively affect the continued decline in household waste e.g. addition of significant number of new homes | Maintains status quo | e.g. causes increase in one stream of household waste and decline in another | Household waste unaffected | Household waste reduction considered | Some commitment and ideas for supporting household waste reduction | Strong commitment and innovative ideas for supporting household waste reduction | 0 | | Likely to be an increase with large quantities of development. Assumption that a LP policy would prevent very large quantities |
| | ...improve rates of household waste diverted from landfill? | 100% waste to landfill | Approximately 50% waste to landfill | Some waste to landfill e.g. 10% | e.g. reduced waste to landfill possible but may not be achieved in practise | No waste will occur or household waste not relevant | Some waste diverted from landfill e.g. 10% | Approximately 50% waste diverted from landfill | Zero waste to landfill can be achieved. | 0 | ? | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| | ...reduce construction waste? | Construction waste increased significantly | Construction waste increased | Construction waste increased slightly | e.g. quantity of waste produced will depend on reputation of contractor used | No construction waste will occur or construction waste not relevant | Construction waste decreased slightly | Construction waste decreased | Construction waste decreased significantly | 0 | | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| Water | Manage flood risk and conserve, protect and enhance water resources | Significantly worsens existing consumption rates | Worsens existing consumption rates | Maintains status quo | e.g. impact upon consumption unclear | No impact on water consumption | Consumption rates reduced to national average | Consumption rates reduced to Building Regulations requirement of 125 lppd | Consumption rates reduced to optional standard of 110 lppd | 0 | | This aspect would be considered through DM policy. Not possible to score at strategy level. It is recommended that the government's higher optional technical standard is implemented, Developing such a large quantity of greenfield land could worsen impacts but difficult to score without exact detail of locations. Majority of development locations would be acceptable. However, some locations around Paddock Wood are in flood zones 3 and would fail the exception test. Likewise, Lamberhurst has areas of flood zone 3 that would make development difficult. |
| | ...manage impacts from flooding? | Significantly worsens impacts identified from SFRA | Worsens impacts identified from SFRA | Maintains status quo | e.g. impacts are unknown | No change to flood impacts | Improves impacts from flooding | Significantly improves impacts from flooding | Eliminates impacts from flooding | 0 | - | |
| | ...exacerbate flood risk on or off site? | Flood zone 3b and exception test fail | Flood zone 3a and exception test fail | Flood zone 2 and exception test fail | e.g. risk is unknown without further detail | No impact on flood risk | Flood zone 3 but exception test pass and improvements proposed e.g. SUDs | Flood zone 2 but exception test pass and improvements proposed e.g. SUDs | Flood zone 1 | High Legislatively driven. | | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score P | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--|--|---|--|--|--|--|---|--|----------------------|-----------|--|--------------------------|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| ...support improvements in groundwater quality? | High risk of contamination to groundwater e.g. source protection Zone 1 and previously contaminated land | Medium risk of contamination to groundwater e.g. source protection Zone 2 and possible previously contaminated land | Some risk of contamination to groundwater e.g. in source protection Zone 3 and unknown existing land contamination | e.g. risk is unknown without further investigation | No impact upon groundwater quality | Some support for improvements in groundwater quality | Support for improvements in groundwater quality | Significant support for improvements in groundwater quality e.g. prevention of intensive agriculture in source protection zone 1 | 0 | | Difficult to score without exact detail of locations. However, it is assumed that there would be no development that would create contamination risk to a SPZ. | |
| ...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities? | Pressures increased significantly | Pressures increased | Pressures increased slightly | e.g. agricultural pressures reduced but water industry pressures increased | No impact upon pressures on water bodies | Pressures reduced slightly | Pressures reduced | Pressures reduced significantly | 0 | | Building a significant amount of residential housing in the borough is unlikely to create additional pressure from the practises that cause most damage (agriculture, water industry and rural land management). Industrial development would require more stringent controls. This is an location specific aspect to be considered through DM policy. | |

Option 3 - GS3 - Dispersed Growth

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|--|---|---|--|--|--|---|---|-------------------------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Air | Reduce air pollution | ...help meet NO2 and PM10 targets along the A26 in Royal Tunbridge Wells? | Significantly increases traffic in AQMA e.g. >50 vehicles per day | Increases traffic in AQMA e.g. 10 - 50 vehicles per day | Slightly increases traffic in AQMA e.g. <10 vehicles per day | e.g. reduces private car use but increases business or commercial traffic. | Neither increases nor reduces traffic in AQMA | Slightly reduces traffic in AQMA e.g. <10 vehicles per day | Reduces traffic in AQMA e.g. 10-50 vehicles per day | Significantly reduces traffic in AQMA e.g. >50 vehicles per day | High Legislatively driven. | Concentrating a large proportion of development in RTW and SB means increased traffic in AQMA. Development in RTW/SB could collect Section 106 money for car club etc. but service still bedding in. Also, EV charge points could be added but not many people drive EV yet so would take time to see any benefit. Measures could be introduced to all other settlements and villages for the first time. This would be beneficial for isolated villages with heavy reliance on private car. |
| | | ...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options? | Removes support for improving air quality with significant negative consequences | Removes support for improving air quality | Removes support for improving air quality with minimal negative consequences | e.g. supports local car club but also increases parking for private cars | Neither offers nor removes support for improving air quality | Provides support for improving air quality with minimal benefits | Provides support for improving air quality | Provides support for improving air quality with significant benefits | 0 | Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport in more urban areas is already relatively good so benefit may be small. If development in villages was coupled with improvements to local services and facilities and active transport infrastructure a benefit may be seen as these areas are currently heavily reliant on private car. |
| | | ...promote forms of active travel including cycling and walking? | Cycling and walking discouraged e.g. >50 less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. <10 cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | Strategy does not specify exact locations for sensitive receptors. However, with growth focussed in RTW and SB and support for improving air quality in it's infancy, it seems probable that existing sensitive receptors will experience higher rates of poor air quality |
| | | ...help reduce premature deaths from poor air quality (cause by PM2.5)? | Sensitive receptors inside AQMA | Sensitive receptors in area with busy traffic | Sensitive receptors in area with some traffic | e.g. relocates sensitive receptors into area of equally poor air quality | Health of sensitive receptors unchanged | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors in area with significantly less traffic and outside AQMA | High Lives at stake. | Such a large quantity of development across the borough is highly likely to cause losses for biodiversity. Urban focus may help but brownfield sites are limited. It is recommended that mitigation schemes are devised. |
| Biodiversity | Protect and enhance biodiversity and the natural environment | ...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNVCV, RNR, BOA and undesignated habitat)? | Full loss of a site of biodiversity value | Partial loss of a site of biodiversity value | Degradation of a site of biodiversity value | e.g. improvements to one site come at expense of another site | No impact upon sites of biodiversity value | Protection of site of biodiversity value | Protect and improve site of biodiversity value | Protect, improve and increase size/function of site of biodiversity value | 0 | Such a large quantity of development across the borough is highly likely to cause losses for biodiversity. Urban focus may help but brownfield sites are limited. It is recommended that mitigation schemes are devised. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|---|--|---|---|---|---|---|--|--|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations? | Likely significant effects definite, no effective mitigation available | Likely significant effects probable, mitigation may be ineffective | Likely significant effects possible, mitigation likely to be effective | e.g. effectiveness of mitigation available to prevent likely significant effects is unknown | No impact upon the Ashdown forest | No or insignificant impact upon the Ashdown Forest and provision of some green space | No or insignificant impact upon the Ashdown Forest disturbance and provision of SAMMS | No or insignificant impact upon the Ashdown Forest disturbance and provision of SANGS | High Ashdown Forest is of international significance | | Distributing development across the borough would be beneficial. However, focussing a large amount of development in RTW makes impacts upon the Ashdown Forest more likely. Funding for SAMM could be collected though. |
| | ...support work to improve condition of SSSIs? | Full loss of a SSSI | Partial loss of a SSSI | Degradation of a SSSI | e.g. a combination of negative and positive impacts | Neither improves nor contributes to a decline in the condition of SSSIs | Protection of SSSI | Protect and improve | Protect, improve and increase size/function | High SSSIs are of national significance | | Difficult to score until know exact location of development but assumed that al SSSI in borough would be protected as a minimum. |
| | ...help support existing business and the growth of new businesses? | - Loss of >500m2 floor space/premises suitable for new businesses - Extremely slow broadband - Extremely limited transport options - Extremely limited availability of staff | - Loss of 250m2 - 500m2 floor space/premises suitable for new businesses - Very slow broadband speed - Very limited transport options - Limited availability of staff | - Loss of up to 250m2 floor space/premises suitable for new businesses - Slow broadband speed - Limited transport options - Limited availability of suitable staff | e.g. suitable premises but no fast broadband | No impact on new business survival | - Gain of up to 250m2 floor space/premises suitable for new businesses - Reasonable broadband speed - Small range of transport options - Small range of suitable staff | - Gain of 250m2 - 500m2 floor space/premises suitable for new businesses - Good broadband speed - Wide range of transport options - Wide range of suitable staff | - Gain of >500m2 floor space/premises suitable for new businesses - Fast broadband speed - Very wide range of transport options - Very wide range of suitable staff | Less weight TW is better than national average (see Economic Needs Assessment) | | 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. |
| Business Growth | Encourage business growth and competitiveness | Loss of > 500m2 floor space | Loss of 250m2 - 500m2 floor space | Loss of < 250m2 floor space | e.g. support for one industry associated with a loss for another industry | No impact on wholesale, health and finance industries | Gain of < 250m2 floor space | Gain of 250m2 - 500m2 floor space | Gain of > 500m2 floor space | 0 | | Need to know type of development proposed to score accurately. Development in urban areas is likely to support these industries (staff & transport). However, mixed picture as loss of economic floor space may occur in preference to housing whereas construction-related activities are likely to be supported by the significant development needed. |
| | ...prevent loss of economic floor space in preference for housing and other non employment generating uses within Key Employment Areas and other well located employment sites? | > 500m2 economic floor space lost in preference for housing | 250m2 - 500m2 economic floor space lost in preference for housing | < 250m2 economic floor space lost in preference for housing | e.g. viability of existing economic floor space unknown | No impact on economic floor space or economic floor space lost in non-viable location | Housing development preserves existing economic floor space | Housing development preserves existing or provides for more economic floor space | Housing development preserves existing and provides for additional economic floor space | 0 | | Housing demands are extremely high and residential development is a more viable option for developers. It seems likely that some economic floor space will be sacrificed (as has been the trend up to now). Developing in the urban areas is likely to exacerbate this trend as more economic floor space is located here. A policy would be needed to prevent this happening. |
| | ...recognise and help develop the rural economy? | Rural economy lost and prevented from developing in the future | Loss for the rural economy | Rural economy diminished | e.g. support for one industry associated with a loss for another industry | No impact on the rural economy | Rural economy protected | Rural economy protected and expanded | Rural economy protected and significantly expanded | 0 | | A small amount of development in rural settlements could help the rural economy. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|--|--|---|--|--|--|---|---|-------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Climate Change & Energy | ...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures? | Adaptation measures excluded with significant negative consequences | Adaptation measures excluded | Adaptation measures excluded but with minimal negative consequences | Adaptation measures have negative consequences e.g. drought resilient plants are preferable to invasive species | Adaptation is not possible or no climate change pressures exist in that location | Adaptation measures incorporated but with minimal benefits | Adaptation measures incorporated | Adaptation measures incorporated with significant benefits | 0 | | Difficult to score until know exact details of development |
| | ...support reduction in carbon and energy so targets are consistently met? [Nb. short term effects e.g. construction related are considered by Objective 15: Resources] | Increases carbon significantly compromising reduction target | Increases carbon making reduction target difficult to achieve | Maintains status quo. Increases carbon slightly but reduction target is still achievable | e.g. reduces carbon from domestic sources but increases carbon from transport | Neither increases nor reduces carbon | Reduces carbon but unlikely to meet annual target | Meets annual carbon reduction targets | Exceeds annual carbon reduction targets | High Targets are currently not being met. | -- | Building a large number of new homes is likely to increase carbon and energy demands significantly. Developing in rural locations will not help reduce transport related carbon. |
| | ...support opportunities to utilise biomass in the borough? | Biomass opportunities discouraged with significant negative consequences | Biomass opportunities discouraged | Biomass opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages biomass | Biomass opportunities supported | Biomass opportunities supported and realised | Biomass opportunities supported and realised with significant benefits | 0 | | Difficult to score until know exact details of development. However, developing predominantly in urban areas will make use of biomass difficult as this is where air quality is poorest. |
| | ...support opportunities to install community heating schemes? | Community heating opportunities discouraged with significant negative consequences | Community heating opportunities discouraged | Community heating opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages community heating | Community heating opportunities supported | Community heating opportunities supported and realised | Community heating opportunities supported and realised with significant benefits | Low Opportunities are limited | | RTW was identified as having some potential for community heating in the pre-feasibility study completed by KCC. However, further studies would be required. |
| Deprivation | ...address pockets of deprivation and encourage regeneration? | Significant regeneration diverted away from a pocket of severe deprivation | Some regeneration activates diverted away from pocket of deprivation | Small amount of regeneration activates diverted away from pockets of deprivation | e.g. regeneration adjacent to a pocket of deprivation may trigger future regeneration but there is no guarantee | No impact upon pockets of deprivation | Small amount of regeneration in a pocket of deprivation | Some regeneration in a pocket of deprivation | Significant regeneration in a pocket of severe deprivation e.g. major housing or retail development | 0 | + | Pockets of deprivation are concentrated in urban areas. Developing here increases the likelihood that these could be improved. Development in some rural areas is unlikely to address the problem. |
| | ...reduce rates of fuel poverty? | Energy demand increase of >50% | Energy demand increase of 10% - 50% | Energy demand increase of <10% | e.g. energy saving principles incorporated but users unlikely to be affected by fuel poverty | No impact on fuel poverty | Energy reductions of <10% | Energy reductions of 10% - 50% | Energy reductions of >50% | 0 | | Difficult to score until know exact details of development. Recommend that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. Could be incorporated into affordability criteria for new homes. |
| Education | ...meet demand for school places? | Will increase demand by >50% | Will increase demand by 10-50% | Will increase demand by <10% | New school proposed in long term but impact of demand will be felt in short term | No impact on school places or demand for new places can be accommodated | Will reduce demand by <10% | Will reduce demand by 10-50% | Will reduce demand by >50% | HIGH More pressing need | 0 | Assuming development will address both existing and future demands, no impact expected. |
| | ...continue to support a high proportion of highly qualified residents? | Complete removal of significant support | Reduces support | Small reduction in support | e.g. support for higher education comes at expense of further education | No impact on highly qualified residents | Provides a small amount of support | Provides support | Provide significant support | 0 | | Difficult to score until know exact details of development |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|--|--|---|---|--|---|--|--|---|--|--------------------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Employment | Facilitate and support employment opportunities | ...improving employment opportunities in key wards? | In key wards... - Loss of a significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Extremely poor access to transport - Very poor opportunities for developing new skills | In key wards... - Loss of a number of permanent employment opportunities provided e.g. 10-50 new jobs - Very poor access to transport - Poor opportunities for developing new skills | In key wards... - Loss of a small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Poor access to transport - Very poor opportunities for developing new skills | e.g. job opportunities at risk but not certain | No impact on employment opportunities in key wards | In key wards... - A small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Reasonable access to transport - Reasonable opportunities for developing new skills | In key wards... - Number of permanent employment opportunities provided e.g. 10-50 new jobs - Good access to transport - Good opportunities for developing new skills | In key wards... - Significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Very good access to transport - Very good opportunities for developing new skills | LOW Unemployment in borough is very low generally | + | Developing in more urban areas mean access to transport and skills is more likely. Although RTW is much better than Hawkhurst/Cranbrook for transport. Frittenden, Sissinghurst, Speldhurst and Bidborough wards have the lowest unemployment rates in the borough. Employment development here would not be as helpful as it would in other locations in the borough. |
| Equality | Increase social mobility and inclusion | ...improve physical activity rates for low income population groups? | A significant number of opportunities affecting the lowest income population groups missed | Opportunities missed | A small number of opportunities missed | e.g. support in one parish comes at expense of support elsewhere | No impact on physical activity rates | A small number of opportunities provided | Opportunities provided | A significant number of opportunities provided that benefit the lowest income population groups | 0 | ++ | Developing in these urban locations matches up with pockets of income deprivation and so increases likelihood that some money and regeneration will be available to help. Assumption that development does not take away existing green spaces. Development in some rural areas would not help address the problem. |
| | | ...improve social mobility problems caused by selective grammar schools? | Provision for a new grammar school | Expansion of an existing grammar school | Increase in catchment area of existing grammar school | e.g. grammar school dedicates places for low income families | No impact on selective education | Increase in catchment area of existing non-selective school | Expansion of an existing non-selective secondary school | Provision for a new non-selective secondary school | 0 | | |
| Health | Improve health and wellbeing, and reduce health inequalities | ...meet demand for elderly care services? | Does not meet existing demand and significantly increases future demand | Does not meet existing demand and increases future demand | Does not meet existing demand | e.g. meets existing demand at expense of future demand or vice versa | Does not impact upon elderly care services | Meets existing demand | Meets existing demand and reduces future demand | Meet existing demand and significantly reduces future demand | HIGH Growing elderly population | | Difficult to score until know exact details of development |
| | | ...improve physical activity rates for at risk population groups? | Significantly reduces changes for improvement of physical activity rates for at risk populations | Reduces chances for improvement of physical activity rates for at risk populations | Slightly reduces chances for improvement of physical activity rates for at risk populations | e.g. increasing physical activity rates for some at risk populations comes at the expense of other at risk populations | Neither increases nor reduces physical activity rates | Slightly increases physical activity rates for at risk populations | Increases physical activity rates for at risk populations | Significantly increases physical activity rates for at risk populations | 0 | + | The majority of inactive groups are located in main settlements (but not all) so developing here increases the likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces. Putting more development in rural areas does not help address the problem. |
| | | ...address pockets of health deprivation? | Significantly reduces changes for improvement of pockets of health deprivation | Reduces chances for improvement of pockets of health deprivation | Slightly reduces chances for improvement of pockets of health deprivation | e.g. reduces or improves one area of health deprivation at the expense of a different area | Does not impact upon pockets of health deprivation | Will slightly improve or reduce pockets of health deprivation | Will improve or reduce pockets of health deprivation | Will significantly improve or reduce pockets of health deprivation | 0 | | All the pockets are located in locations earmarked for development by this strategy so this strategy increases the likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|---|---|---|---|--|--|--|---|---|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers? | Removes provision of specialist health care or support services and causes significant problems | Removes provision of specialist health care or support services | Removes provision of specialist health care or support services, but accessible services are still available | e.g. helps one illness at the expense of another illness | Does not impact upon specialist health care or support services | Helps with provision of specialist health care or support services but with minimal benefits | Helps with provision of specialist health care or support services | Significantly helps with provision of specialist health care or support services | 0 | | Difficult to score until know exact details of development |
| | ...meet need for green open space and recreation facilities? | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is both too far (more than twice recommended distance) and/or too small (less than half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either too far (e.g. twice recommended distance) and/or too small (e.g. half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either slightly too far (less than twice recommended distance) and/or slightly too small (more than half recommended size) | e.g. Accessible Natural Greenspace is allocated to one population at the expense of a different population | Green open space and recreation facilities not relevant | Meets 1 or 2 Accessible Natural Greenspace Standards | Meets 3 or 4 Accessible Natural Greenspace Standards | Meets all Accessible Natural Greenspace Standards | HIGH TWBC is already behind on these standards | | Assumption that development does not take away existing accessible green space, however, still seems unlikely that high demands for housing will provide sufficient new green space to meet these standards (which the Borough is already behind on). However, developing in more rural areas improves the changes of being able to improve upon accessible green open spaces. |
| | ...ensure residents can access heritage assets? | Significantly worsens or prevents access to heritage assets (e.g. severance of access route) | Worsens access to heritage assets (e.g. removes pedestrian access) | Slightly worsens access to heritage assets (e.g. pedestrian access route lengthened) | e.g. access is possible but other factors may prevent visits | Does not impact upon access to heritage assets | Slightly improves access to heritage asset (e.g. pedestrian access route shortened) | Improves access to heritage assets (e.g. provision for new modes of travel) | Significantly improves access to heritage assets (e.g. addition of new access route) | 0 | | Best transport links are from/to main settlements. Although, Hawkhurst and Cranbrook not as good as RTW. Development in rural areas may provided funding for improved accessed. |
| Heritage | Preserve and enhance historical and cultural heritage assets ...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance? | Significantly fails to protect, e.g. total demolition of a heritage asset, complete loss a significant contributor in historic area, complete loss of archaeological site, complete loss of element of setting which forms an important part of its significance. | Fails to protect, e.g. partial demolition of a heritage asset, removal of a part of a heritage asset that contributes strongly to significance, partial loss of element of setting that forms part of its significance. | Protection compromised, e.g., causes less than significant harm by partial demolition, removal of part of a heritage asset, or a structure that forms part of its setting. | Protection or enhancement possible but other policies could hinder, e.g. green belt designation, AONB, housing quotas, requirements for commercial use, potential for preventing reuse of historic buildings at risk. | No impact. Does not prevent or cause harm e.g. no impact on the special architectural or historic character of a building, structure or area, or any impact on archaeology | Protects heritage assets from harm or deterioration e.g. allows reuse of heritage assets which prevents deterioration or further harm, stabilises condition of heritage assets, a use which would allow for retention of setting, enables long term appropriate use of asset | Protects and enhances significance, e.g. allows restoration of historic features, setting, allows interpretation, removes detractors to its significance, enables long term optimum viable use | Provides significant enhancement e.g. use which allows for its retention if redundant, a complete restoration of a building at risk, complete restoration of an important part of a conservation area, removal of significantly harmful detractors. | High Assets and settings are often finite or hard to restore once lost | + | Strategy has both positives and negatives. Focusing on built up areas would put pressure on the historic environment especially in RTW. Although, spreading the growth across rural settlements would lessen this affect. Also, small developments in very rural settlements could have positive impacts as farmstead are preserved etc. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|---|---|---|---|---|--|--|--|-------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...provide a framework for a positive heritage strategy including enhancements in line with NPPF? | Significantly worsens provision by the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Worsens provision by the historic environment for the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Prevents enhancement opportunities for and by the historic environment for one of the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Provides potential for enhancement of and by the historic environment but other priorities could hinder | No opportunities for enhancement are available. | Slight enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Significant enhancement opportunities from the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | 0 | | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population) |
| Housing | Provide sufficient housing to meet identified needs | | | | | | | | | | | |
| | ...meet identified needs for affordable housing? | No provision made for affordable housing and demands increased significantly | No provision made for affordable housing and demands increased | No provision made for affordable housing | e.g. affordable housing needs met in one site/phase/ location at the expense of another | No relevance to affordable housing | A small proportion of affordable housing needs met | Affordable housing needs partially met | Affordable housing needs met in (or near) full | High Housing demands in borough are not being met. | | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs but this strategy also would help address rural needs Building large number of new homes provides opportunities to ensure needs are met. |
| | ...meet demand for housing suitable for older people downsizing? | No provision made for older persons housing needs and demands increased significantly | No provision made for older persons housing needs and demands increased | No provision made for older persons housing needs | e.g. older persons housing needs met in one site/phase/ location at the expense of another | No relevance to older persons housing needs | A small proportion of older persons housing needs met | Older persons housing needs partially met | Older persons housing needs met in full | High Housing demands in borough are not being met. | | Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. |
| | ...meet demand for 2 and 3 bed market housing to suit expanding families? | No provision made for 2 and 3 bed housing needs and demands increased significantly | No provision made for 2 and 3 bed housing needs and demands increased | No provision made for 2 and 3 bed housing needs | e.g. 2 and 3 bed housing needs met in one site/phase/ location at the expense of another | No relevance to 2 and 3 bed housing demands | A small proportion of demand for 2 and 3 bed market housing met | Some of the demand for 2 and 3 bed market housing met | Demand for 2 and 3 bed market housing met in full | High Housing demands in borough are not being met. | ++ | Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. |
| | ...make allowances in housing targets due to environmental constraints in the borough? | No allowances made and constraints not given weight | No allowances made and constraints given limited weight | No allowances made but constraints given moderate weight | e.g. allowances made in one location at the expense of another | Not relevant to housing targets | Limited allowances made | Some allowances made | Significant allowances made | 0 | | Urban development approach would help a little as development in RTW is outside of AONB. However, historic environment more constraining in RTW, and Cranbrook and Hawkhurst within AONB and large quantity of development here will be negative. Also, Paddock Wood flooding issues not avoided. Many rural villages in the AONB. Also green belt land likely to be needed. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|--|---|---|---|---|--|---|--|---|---|--|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Land use | ...protect Green Belt? | Development would detract from all of the 5 purposes of the Green Belt | Development would detract from 3-4 of the purposes of the Green Belt | Development would detract from 1-2 of the purposes of the Green Belt | e.g. development is not on Green Belt but may benefit or detract from adjacent Green Belt | No impact upon Green Belt or impact is on an area of land that serves none of the 5 purposes of Green Belt | Development would respect the 5 purposes of the Green Belt | Development would respect the 5 purposes of the Green Belt and enhances beneficial use | Development would respect the 5 purposes of the Green Belt and significantly enhances beneficial use | 0 | | Development in GB would be needed. Coalescence of settlements may be a problem. GB review should ensure that urban and derelict land is regenerated in preference to high quality countryside. | |
| | Protect soils, and reuse previously developed land and buildings | ...develop on previously developed land in preference to greenfield land? | >50% of development located on greenfield land | 10%-50% of development located on greenfield land | Up to 10% of development located on greenfield land | e.g. previous use of land unknown | No impact on land type | Development entirely on previously developed land and adjacent to greenfield | Development entirely on and adjacent to previously developed land | Development located entirely on and surrounded by previously developed land | High. Housing white paper suggests great weight should be applied to suitable b/f | --- | Developing primarily in urban areas increases likelihood of finding brownfield sites. However, extremely unlikely to be enough to enable such a large quantity of development. |
| | ...prioritise development on lower grade agricultural soils? | >20ha of development on best and most versatile soils | <20ha of development on best and most versatile soils | Development on agricultural soils of any grade | e.g. grading of agricultural soil unknown | No impact on agricultural soils or no change to soil grading | Protect agricultural soils of any grade | Protect and improve <20ha of best and most versatile soils | Protect and improve >20ha of best and most versatile soils | 0 | | Difficult to score without exact detail of locations. Prioritising urban development reduces the risk of permanently losing high grade soils. However, strategy allows for rural development onto soils of unknown grading. | |
| Landscape | Protect and enhance landscape and townscape | ...protect and enhance the High Weald AONB and historic landscape? | 1) Near full or full loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/pattern: - near completely or completely out of keeping with existing settlement | 1) Partial loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/pattern: - out of keeping with existing settlement | 1) Degradation of: - exposed geology - gills, streams, ponds - woodland - fields and heath - routeway 2) Scale/setting/pattern: - slightly out of keeping with existing settlement | e.g. exposed geology protected but pond degraded or one routeway diverted and another restored or improvements to settlement edge but development is still out of scale | No impact on the AONB | 1) Protection of: - exposed geology - gills, streams, ponds - routeway - woodland (W1) - fields and heath - routeway 2) Scale/setting/pattern: - generally in keeping with existing settlement - no significant harm | 1) Protection & improvement of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath - routeway 2) Scale/setting/pattern: - in keeping with existing settlement - no harm | 1) Protection, improvement & increase size/function of: - exposed geology - gills, streams, ponds - routeway - woodland (W2) - fields and heath - routeway 2) Scale/setting/pattern: - in keeping with and enhances existing settlement | Great weight as per NPPF | --- | Urban development approach would help a little as development in RTW is outside of AONB. However, Cranbrook and Hawkhurst within AONB and large quantity of development here likely to be negative. Also, many rural settlements are within the AONB and highly sensitive. |
| | ...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? | 1) Near full or full loss of ancient woodland 2) Near full or full loss of management opportunities or access | 1) Partial loss of ancient woodland 2) Partial loss of management opportunities or access | 1) Degradation of ancient woodland 2) Scaled down management opportunities or access | e.g. recreation management conflicts with biodiversity management | No impact on ancient woodland | 1) Protection of ancient woodland 2) Improvement to existing management opportunities or access | 1) Protection and enhancement of ancient woodland 2) Addition of management opportunities or access | 1) Protection, enhancement and improve function of ancient woodland 2) Significant addition of management opportunities or access | High AW is a finite habitat | | Difficult to score without exact locations of development. However, NPPF para 118 suggests loss or deterioration of ancient woodland would be refused (unless benefits outweigh the loss). Recent Housing White Paper also places emphasis on protecting ancient woodland. | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|--|--|---|---|--|--|--|---|--|-------------|---|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...strengthen Green Infrastructure? | Near full or full loss of GI and/or full loss of management opportunities | Partial loss of GI and/or partial loss of management opportunities or access | Degradation of GI and/or scaled down management opportunities or access | e.g. a combination of negative and positive impacts | No impact on GI or no net loss of GI | Protection of GI and/or improvement to existing management opportunities | Protection and enhancement of GI and/or addition of management opportunities | Protection, enhancement and increase size/function of GI and/or significant addition of management opportunities | 0 | | Difficult to score without exact detail of development locations. However, assumed that there would be no net loss of GI. | |
| | ...protect and enhance landscape and townscape character and quality? | High adverse impacts | Moderate adverse impacts | Minor adverse impacts | e.g. a combination of negative and positive impacts | No visual impacts or impact on landscape and townscape character and quality | Minor positive impacts | Moderate positive impacts | High positive impacts | 0 | | Focusing a large amount of development in RTW/SB relieves some pressure on protected landscape but would put increased pressure on townscape character. Also, towns of HH and CB are both in AONB. Policy to ensure high quality and sympathetic design is required. Blending development with the character of rural locations will be more challenging. | |
| Noise | Reduce noise pollution | <ul style="list-style-type: none"> - Increase road noise dramatically in an IARN - Position sensitive receptors in an IARN | <ul style="list-style-type: none"> - Increase road noise in an IARN - Develop large number of residential housing in an IARN | <ul style="list-style-type: none"> - Increase road noise slightly in an IARN - Develop residential housing in an IARN | e.g. development is adjacent to an IARN and may contribute to worsening effects | No impact upon an IARN | <ul style="list-style-type: none"> - Reduce road noise slightly in an IARN - Provide noise mitigation for residents located in an IARN | <ul style="list-style-type: none"> - Reduce road noise in an IARN - Relocate number of sensitive receptors away from an IARN | <ul style="list-style-type: none"> - Reduce road noise dramatically in an IARN - Relocate large number of sensitive receptors away from an IARN | HIGH Great control over this issue and more certainty | | 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 IARNs. 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. Focusing large amount of development in RTW would increase likelihood of needing to build in flight path. Paddock Wood rail line is also a noise sensitive area. Rusthall, Langton Green and Speldhurst currently have 20 or more flights per day. | |
| | ...consider noise pollution from aircraft and trains? | <ul style="list-style-type: none"> - Position sensitive receptors in flight path or adjacent to main railway | <ul style="list-style-type: none"> - Develop residential housing in main flight path (20 flights per day or more) or adjacent to main railway | <ul style="list-style-type: none"> - Develop residential housing on edge of flight path (5-20 flights per day) or near to main railway | e.g. flight path subject to change | No impact upon flight path | <ul style="list-style-type: none"> - Provide noise mitigation for residents located in flight path or near to main railway | <ul style="list-style-type: none"> - Relocate number of sensitive receptors away from edge of flight path or adjacent to railway | <ul style="list-style-type: none"> - Relocate large number of sensitive receptors away from main flight path or adjacent to railway | 0 | | | |
| Resources | Reduce the impact of resource consumption | <ul style="list-style-type: none"> ...prevent unsustainable demolition and rebuild projects? | Demolition and rebuild required | Demolition and rebuild encouraged | Demolition and rebuild promoted slightly | e.g. demolished building is unusable and new build is extremely sustainable | Demolition and rebuild not applicable | Demolition and rebuild reduced slightly | Demolition and rebuild reduced | Demolition and rebuild prevented | 0 | | Difficult to score without exact detail of locations |
| | ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? | Responsible sourcing/low impact materials prohibited | Responsible sourcing/low impact materials strongly discouraged | Responsible sourcing/low impact materials discouraged slightly | e.g. suitable low impact/responsibly sourced material does not currently exist | Responsible sourcing/low impact materials not applicable | Responsible sourcing/low impact materials encouraged slightly | Responsible sourcing/low impact materials strongly encouraged | Responsible sourcing/low impact materials mandatory | 0 | ? | This aspect would be considered through DM policy. Not possible to score at strategy level. | |

| Sustainability Objective | | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|--|---|---|--|---|--|---|---|---|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Services and facilities | Improve access to and range of key services and facilities | ...support the contribution to the local economy from tourism? | Tourism strongly discouraged e.g. closure of major attraction | Tourism discouraged | Tourism discouraged slightly | e.g. opening a new attraction reduces visitors to an existing attraction | Tourism not relevant | Tourism supported slightly | Tourism supported | Tourism supported strongly e.g. opening of major attraction | Low Tourism contributes a relatively small amount to local economy | Developing in urban areas more likely to increase visitor numbers to easy to reach attractions. Developing in rural areas may increase car based visitors to more remote attractions e.g. Scotney/Sissinghurst Castle, Bedgebury |
| | | ...support superfast broadband connectivity in final 5% of the borough? | Development in all of the locations of borough not connected to superfast broadband | Development in some of the locations of borough not connected to superfast broadband | Development in a few of the locations of borough not connected to superfast broadband | e.g. speed for a particular location is not known | No impact upon broadband speeds in areas of need. | Development that guarantees superfast connection in a few of the locations of borough not currently connected | Development that guarantees superfast connection in a some of the locations of borough not currently connected | Development that guarantees superfast connection in all of the locations of borough not currently connected | 0 | Majority of urban areas will already have superfast. However, there are parts of HH, Lamberhurst, Rusthall, Iden Green and Benenden that do not yet have superfast. |
| | | ...improve range of services and facilities especially in rural settlements? | Loss and poor range of existing key services or facilities | Loss or poor range of existing key services or facilities | Loss or limited range of existing key services or facilities | e.g. improvements in one service and loss of another service | Not relevant to provision of services and facilities | Gain or good range of existing services or facilities | Gain or near full range of existing key services or facilities nearby | Gain or full range of existing key services or facilities and wide range of further services and facilities nearby | High A critical issue when determining where to develop. More weight if a rural settlement. | Services in urban areas already suitable except lack of train station for CB and HH, and no secondary school for HH. Developing in the larger rural settlements would be constrained by lack of services such as secondary school, supermarket and doctors surgery. Developing in smaller rural settlements would be constrained by lack of numerous services such as schools, shops, health provision and transport e.g. Iden Green, Kilndown, Frittenden, The Moor |
| | | ...retail and leisure growth? (study underway) | Loss and poor range of existing retail and leisure facilities | Loss or poor range of existing retail and leisure facilities | Loss or limited range of existing retail and leisure facilities | e.g. improvements in one facility and loss of another facility | Not relevant to provision of retail and leisure facilities | Gain or good range of existing retail and leisure facilities | Gain or near full range of existing retail and leisure facilities | Gain or full range of existing retail and leisure facilities and wide range of further retail and leisure facilities nearby | 0 | Sports centres and wide range of shops in all urban areas except HH. However, HH has a cinema. |
| | ...improve access to services and facilities especially in rural settlements? | Nearest services or facilities only accessible by private car OR existing accessibility worsened significantly | Public transport needed to access services and facilities is infrequent or unreliable OR existing accessibility worsened | Key services and facilities accessible only by public transport OR existing accessibility worsened slightly | Access route undetermined | Not relevant to access to services and facilities | Key services and facilities are within desirable walking distance OR existing accessibility improved slightly | Key services and facilities are within desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved | Key services and facilities are within half the desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved significantly | High A critical issue when determining where to develop. More weight if a rural settlement. | Developing primarily in urban areas mean most services are easily accessible on foot. Although, HH and CB do not have easily accessible train station. Also, larger rural settlements are lacking in some services and smaller rural settlements are lacking in many services and thus travel is necessary (and not always convenient in rural locations). Some services in small rural settlements will only be accessible by private car. | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|---|--|---|---|--|---|---|---|---|--|--------------------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Travel | Improve travel choice and reduce the need to travel by private vehicle | ...support priority transport projects? | Significant negative impact e.g. multiple projects inhibited | Some negative impact e.g. severe delays | Slight negative impact e.g. project delayed | e.g. one project supported at the expense of another | Priority transport projects unaffected | Minimal support e.g. project recognised or land reserved | Support given to promote one or more projects | Significant support e.g. multiple projects promoted or accelerated timescales | 0 | -- | Building in urban areas could help public space improvements and A26 capacity improvements in RTW and speed restriction projects elsewhere. Access to train stations more likely when concentrating development in most urban areas. However, rail stations not easily accessible from larger rural settlements without private car e.g. Goudhurst to Paddock Wood. Access from smaller rural settlements e.g. Iden Green, very difficult. Improvements to urban bus services brought about by increased development will be accompanied by potential improvements in some of the less-well served rural settlements as growth is also directed to these locations. Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport would also be better than rural areas so benefit may be small. Also, in rural settlements heavy reliance on private car to access services and lack of suitable and safe walking or cycling routes may discourage active travel. |
| | | ...prioritise easy access to train stations within and outside the borough? | Access to train station very difficult (e.g. 10miles+ or no public transport) | Access to train station difficult (e.g. 5-10 miles or very limited public transport) | Access to train station inconvenient (e.g. 3-5 miles or limited public transport) | e.g. easy access but unlikely to be train users | Access to train stations not applicable | Convenient access to train station by private car | Convenient access to train station by public transport | Convenient access to train station by foot | 0 | | |
| | | ...improve rural bus services and retain viability of urban bus services? | Significant negative impact on bus services (e.g. removal of a bus route) | Bus services worsened (e.g. loss of multiple bus stops or several services per week) | Bus services worsened slightly (e.g. loss of one bus stop or service per week) | e.g. improvements to one service or route come at expense of another | Bus services unaffected | Opportunities to improve bus services available (e.g. new bus stop or additional service each week) | Improvements to bus services (e.g. addition of multiple bus stops or services per week) | Significant positive impact on bus services (e.g. addition of new route) | LOW Bus use is generally unpopular in borough | | |
| | | ...support opportunities for active travel including cycling and walking? | Cycling and walking discouraged e.g. 50+ less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. 10 less cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | |
| Waste | Reduce waste generation and disposal | ...support continued decline in household waste reduction? | Creates barriers to household waste reduction e.g. large number of new homes with no commitment to reduction | Likely to negatively affect the continued decline in household waste e.g. addition of significant number of new homes | Maintains status quo | e.g. causes increase in one stream of household waste and decline in another | Household waste unaffected | Household waste reduction considered | Some commitment and ideas for supporting household waste reduction | Strong commitment and innovative ideas for supporting household waste reduction | 0 | ? | Likely to be an increase with large quantities of development. Assumption that a LP policy would prevent very large quantities This aspect would be considered through DM policy. Not possible to score at strategy level. This aspect would be considered through DM policy. Not possible to score at strategy level. |
| | | ...improve rates of household waste diverted from landfill? | 100% waste to landfill | Approximately 50% waste to landfill | Some waste to landfill e.g. 10% | e.g. reduced waste to landfill possible but may not be achieved in practise | No waste will occur or household waste not relevant | Some waste diverted from landfill e.g. 10% | Approximately 50% waste diverted from landfill | Zero waste to landfill can be achieved. | 0 | | |
| | | ...reduce construction waste? | Construction waste increased significantly | Construction waste increased | Construction waste increased slightly | e.g. quantity of waste produced will depend on reputation of contractor used | No construction waste will occur or construction waste not relevant | Construction waste decreased slightly | Construction waste decreased | Construction waste decreased significantly | 0 | | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|--|---|--|--|--|--|---|--|----------------------------|-------------|--------------------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Water | Manage flood risk and conserve, protect and enhance water resources | | | | | | | | | | | | |
| | ...reduce water consumption rates? | Significantly worsens existing consumption rates | Worsens existing consumption rates | Maintains status quo | e.g. impact upon consumption unclear | No impact on water consumption | Consumption rates reduced to national average | Consumption rates reduced to Building Regulations requirement of 125 lppd | Consumption rates reduced to optional standard of 110 lppd | 0 | | | This aspect would be considered through DM policy. Not possible to score at strategy level. It is recommended that the government's higher optional technical standard is implemented, |
| | ...manage impacts from flooding? | Significantly worsens impacts identified from SFRA | Worsens impacts identified from SFRA | Maintains status quo | e.g. impacts are unknown | No change to flood impacts | Improves impacts from flooding | Significantly improves impacts from flooding | Eliminates impacts from flooding | 0 | | | Developing such a large quantity of greenfield land could worsen impacts but difficult to score without exact detail of locations. |
| | ...exacerbate flood risk on or off site? | Flood zone 3b and exception test fail | Flood zone 3a and exception test fail | Flood zone 2 and exception test fail | e.g. risk is unknown without further detail | No impact on flood risk | Flood zone 3 but exception test pass and improvements proposed e.g. SUDs | Flood zone 2 but exception test pass and improvements proposed e.g. SUDs | Flood zone 1 | High Legislatively driven. | | | Majority of development locations would be acceptable. However, some locations around Paddock Wood are in flood zones 3 and would fail the exception test. Likewise, Lamberhurst has areas of flood zone 3 that would make development difficult. |
| | ...support improvements in groundwater quality? | High risk of contamination to groundwater e.g. source protection Zone 1 and previously contaminated land | Medium risk of contamination to groundwater e.g. source protection Zone 2 and possible previously contaminated land | Some risk of contamination to groundwater e.g. in source protection Zone 3 and unknown existing land contamination | e.g. risk is unknown without further investigation | No impact upon groundwater quality | Some support for improvements in groundwater quality | Support for improvements in groundwater quality | Significant support for improvements in groundwater quality e.g. prevention of intensive agriculture in source protection zone 1 | 0 | | | Difficult to score without exact detail of locations. However, it is assumed that there would be no development that would create contamination risk to a SPZ. |
| | ...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities? | Pressures increased significantly | Pressures increased | Pressures increased slightly | e.g. agricultural pressures reduced but water industry pressures increased | No impact upon pressures on water bodies | Pressures reduced slightly | Pressures reduced | Pressures reduced significantly | 0 | | | Building a significant amount of residential housing in the borough is unlikely to create additional pressure from the practises that cause most damage (agriculture, water industry and rural land management). Industrial development would require more stringent controls. This is an location specific aspect to be considered through DM policy. |

Policy 4 - GS4 - Growth Corridor-led Approach

| | | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|--|---|---|--|--|--|---|---|----------------------------|--|
| Sustainability Objective | Does the policy/allocation/objective..... | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Air | Reduce air pollution | ...help meet NO2 and PM10 targets along the A26 in Royal Tunbridge Wells? | Significantly increases traffic in AQMA e.g. >50 vehicles per day | Increases traffic in AQMA e.g. 10 - 50 vehicles per day | Slightly increases traffic in AQMA e.g. <10 vehicles per day | e.g. reduces private car use but increases business or commercial traffic. | Neither increases nor reduces traffic in AQMA | Slightly reduces traffic in AQMA e.g. <10 vehicles per day | Reduces traffic in AQMA e.g. 10-50 vehicles per day | Significantly reduces traffic in AQMA e.g. >50 vehicles per day | High Legislatively driven. | Concentrating a large proportion of development near to RTW and SB means increased traffic in AQMA, although the A21 may move some traffic away from RTW. Also, existing air quality in this corridor may be worsened to the point of needing control, especially if new residential/sensitive receptors are located near A21. |
| | | ...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options? | Removes support for improving air quality with significant negative consequences | Removes support for improving air quality | Removes support for improving air quality with minimal negative consequences | e.g. supports local car club but also increases parking for private cars | Neither offers nor removes support for improving air quality | Provides support for improving air quality with minimal benefits | Provides support for improving air quality | Provides support for improving air quality with significant benefits | 0 | Development could collect Section 106 money for car club etc. but service still bedding in. Also, EV charge points could be added but not many people drive EV yet so would take time to see any benefit. |
| | | ...promote forms of active travel including cycling and walking? | Cycling and walking discouraged e.g. >50 less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. <10 cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | Assuming appropriate infrastructure is provided (especially cycleways and pedestrian access); locating growth near to potential employment may encourage some active travel. |
| | | ...help reduce premature deaths from poor air quality (cause by PM2.5)? | Sensitive receptors inside AQMA | Sensitive receptors in area with busy traffic | Sensitive receptors in area with some traffic | e.g. relocates sensitive receptors into area of equally poor air quality | Health of sensitive receptors unchanged | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors in area with significantly less traffic and outside AQMA | High Lives at stake. | Strategy does not specify exact locations for sensitive receptors. However, with growth focussed in RTW and SB and support for improving air quality in it's infancy, it seems probable that existing sensitive receptors will experience higher rates of poor air quality. It is recommended that sensitive receptors are kept well away from the A21 roadside. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|---|--|---|---|--|---|---|--|--|---|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Biodiversity | ...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA and undesignated habitat)? | Full loss of a site of biodiversity value | Partial loss of a site of biodiversity value | Degradation of a site of biodiversity value | e.g. improvements to one site come at expense of another site | No impact upon sites of biodiversity value | Protection of site of biodiversity value | Protect and improve site of biodiversity value | Protect, improve and increase size/function of site of biodiversity value | 0 | | Such a large quantity of development is likely to cause losses for biodiversity. Woodland losses are likely with development along the A21 corridor. Pembury Walks and Bayham Woods LWSs would also be under threat. It is recommended that mitigation schemes are devised. | |
| | Protect and enhance biodiversity and the natural environment | ...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations? | Likely significant effects definite, no effective mitigation available | Likely significant effects probable, mitigation may be ineffective | Likely significant effects possible, mitigation likely to be effective | e.g. effectiveness of mitigation available to prevent likely significant effects is unknown | No impact upon the Ashdown forest | No or insignificant impact upon the Ashdown Forest and provision of some green space | No or insignificant impact upon the Ashdown Forest disturbance and provision of SAMMS | No or insignificant impact upon the Ashdown Forest disturbance and provision of SANGS | High Ashdown Forest is of international significance | - | Focussing a large amount of development to the north of RTW makes impacts upon the Ashdown Forest less likely. Detail about the provision of green space (if any) would be required to allow an accurate score. The A21 corridor contains a SSSI (adjacent to Pembury hospital). Brookland Wood SSSI is also a short distance away alongside the A21 to the east. It is assumed that both these sites would be protected and measures would be put in place to prevent degradation over time. |
| | ...support work to improve condition of SSSIs? | Full loss of a SSSI | Partial loss of a SSSI | Degradation of a SSSI | e.g. a combination of negative and positive impacts | Neither improves nor contributes to a decline in the condition of SSSIs | Protection of SSSI | Protect and improve | Protect, improve and increase size/function | High SSSIs are of national significance | | | |
| Business Growth | Encourage business growth and competitiveness | ...help support existing business and the growth of new businesses? | - Loss of >500m2 floor space/premises suitable for new businesses - Extremely slow broadband - Extremely limited transport options - Extremely limited availability of staff | - Loss of 250m2 - 500m2 floor space/premises suitable for new businesses - Very slow broadband speed - Very limited transport options - Limited availability of staff | - Loss of up to 250m2 floor space/premises suitable for new businesses - Slow broadband speed - Limited transport options - Limited availability of suitable staff | e.g. suitable premises but no fast broadband | No impact on new business survival | - Gain of up to 250m2 floor space/premises suitable for new businesses - Reasonable broadband speed - Small range of transport options - Small range of suitable staff | - Gain of 250m2 - 500m2 floor space/premises suitable for new businesses - Good broadband speed - Wide range of transport options - Wide range of suitable staff | - Gain of >500m2 floor space/premises suitable for new businesses - Fast broadband speed - Very wide range of transport options - Very wide range of suitable staff | Less weight TW is better than national average (see Economic Needs Assessment) | +++ | Focusing development adjacent to urban towns is likely to mean a wider range of suitable staff and transport options. A21 is an excellent road link. Broadband is more likely to be of a reasonable speed and existing premises are more likely to be available. Care must be taken if proposing a significant amount of retail just outside of the main town centres as this could have a detrimental impact on town centre trade. |
| | ...support growth of the local economy from professional and financial services, health and education, and construction-related activities. | Loss of > 500m2 floor space | Loss of 250m2 - 500m2 floor space | Loss of < 250m2 floor space | e.g. support for one industry associated with a loss for another industry | No impact on wholesale, health and finance industries | Gain of < 250m2 floor space | Gain of 250m2 - 500m2 floor space | Gain of > 500m2 floor space | 0 | | Need to know what type of development is proposed to score accurately. However, likely to be positive as development in urban areas is likely to support these industries (staff & transport) and construction-related activities are likely to be supported by the significant development needed. | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|--|--|--|---|---|---|--|---|---|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...prevent loss of economic floor space in preference for housing and other non employment generating uses within Key Employment Areas and other well located employment sites? | > 500m2 economic floor space lost in preference for housing | 250m2 - 500m2 economic floor space lost in preference for housing | < 250m2 economic floor space lost in preference for housing | e.g. viability of existing economic floor space unknown | No impact on economic floor space or economic floor space lost in non-viable location | Housing development preserves existing economic floor space | Housing development preserves existing or provides for more economic floor space | Housing development preserves existing and provides for additional economic floor space | 0 | | The A21 corridor is already adjacent to the Long field Road KEA. It seems logical that this strategy should preserve this and provide additional economic floor space in this location. |
| | ...recognise and help develop the rural economy? | Rural economy lost and prevented from developing in the future | Loss for the rural economy | Rural economy diminished | e.g. support for one industry associated with a loss for another industry | No impact on the rural economy | Rural economy protected | Rural economy protected and expanded | Rural economy protected and significantly expanded | 0 | | Developing predominantly in urban areas is unlikely to help the rural economy but also may not cause harm as existing economy is not lost. |
| Climate Change & Energy | ...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures? | Adaptation measures excluded with significant negative consequences | Adaptation measures excluded | Adaptation measures excluded but with minimal negative consequences | Adaptation measures have negative consequences e.g. drought resilient plants are preferable to invasive species | Adaptation is not possible or no climate change pressures exist in that location | Adaptation measures incorporated but with minimal benefits | Adaptation measures incorporated | Adaptation measures incorporated with significant benefits | 0 | | Difficult to score until know exact details of development |
| | ...support reduction in carbon and energy so targets are consistently met? [Nb. short term effects e.g. construction related are considered by Objective 15: Resources] | Increases carbon significantly compromising reduction target | Increases carbon making reduction target difficult to achieve | Maintains status quo. Increases carbon slightly but reduction target is still achievable | e.g. reduces carbon from domestic sources but increases carbon from transport | Neither increases nor reduces carbon | Reduces carbon but unlikely to meet annual target | Meets annual carbon reduction targets | Exceeds annual carbon reduction targets | High Targets are currently not being met. | - | Building a large number of new homes is likely to increase carbon and energy demands significantly. However, concentrating the development in urban areas will help reduce transport related carbon. |
| | ...support opportunities to utilise biomass in the borough? | Biomass opportunities discouraged with significant negative consequences | Biomass opportunities discouraged | Biomass opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages biomass | Biomass opportunities supported | Biomass opportunities supported and realised | Biomass opportunities supported and realised with significant benefits | 0 | | Difficult to score until know exact details of development. |
| | ...support opportunities to install community heating schemes? | Community heating opportunities discouraged with significant negative consequences | Community heating opportunities discouraged | Community heating opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages community heating | Community heating opportunities supported | Community heating opportunities supported and realised | Community heating opportunities supported and realised with significant benefits | Low Opportunities are limited | | This area was not identified as having potential for community heating in the pre-feasibility study completed by KCC. |
| Deprivation | ...address pockets of deprivation and encourage regeneration? | Significant regeneration diverted away from a pocket of severe deprivation | Some regeneration activates diverted away from pocket of deprivation | Small amount of regeneration activates diverted away from pockets of deprivation | e.g. regeneration adjacent to a pocket of deprivation may trigger future regeneration but there is no guarantee | No impact upon pockets of deprivation | Small amount of regeneration in a pocket of deprivation | Some regeneration in a pocket of deprivation | Significant regeneration in a pocket of severe deprivation e.g. major housing or retail development | 0 | | A21 corridor is adjacent to the Sherwood, Southborough and High Brooms deprived areas. Developing here increases the likelihood that these could be improved. However, other parts of the borough are ignored. Difficult to score until know exact details of development. Recommend that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. Could be |
| | ...reduce rates of fuel poverty? | Energy demand increase of >50% | Energy demand increase of 10% - 50% | Energy demand increase of <10% | e.g. energy saving principles incorporated but users unlikely to be affected by fuel poverty | No impact on fuel poverty | Energy reductions of <10% | Energy reductions of 10% - 50% | Energy reductions of >50% | 0 | | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|--|--|---|---|--|---|--|--|---|--|---|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | | | | | | | | | | | | incorporated into affordability criteria for new homes. | |
| Education | Improve educational attainment and enhance the skills base | ...meet demand for school places? | Will increase demand by >50% | Will increase demand by 10-50% | Will increase demand by <10% | New school proposed in long term but impact of demand will be felt in short term | No impact on school places or demand for new places can be accommodated | Will reduce demand by <10% | Will reduce demand by 10-50% | Will reduce demand by >50% | HIGH More pressing need | 0 | Assuming development will address both existing and future demands, no impact expected. |
| | | ...continue to support a high proportion of highly qualified residents? | Complete removal of significant support | Reduces support | Small reduction in support | e.g. support for higher education comes at expense of further education | No impact on highly qualified residents | Provides a small amount of support | Provides support | Provide significant support | 0 | 0 | Difficult to score until know exact details of development |
| Employment | Facilitate and support employment opportunities | ...improving employment opportunities in key wards? | In key wards... - Loss of a significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Extremely poor access to transport - Very poor opportunities for developing new skills | In key wards... - Loss of a number of permanent employment opportunities provided e.g. 10-50 new jobs - Very poor access to transport - Poor opportunities for developing new skills | In key wards... - Loss of a small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Poor access to transport - Very poor opportunities for developing new skills | e.g. job opportunities at risk but not certain | No impact on employment opportunities in key wards | In key wards... - A small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Reasonable access to transport - Reasonable opportunities for developing new skills | In key wards... - Number of permanent employment opportunities provided e.g. 10-50 new jobs - Good access to transport - Good opportunities for developing new skills | In key wards... - Significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Very good access to transport - Very good opportunities for developing new skills | LOW Unemployment in borough is very low generally | +++ | Developing in the A21 corridor and close to urban areas mean access to transport and skills is more likely. This is also near to the wards of Sherwood and St James which have the highest unemployment rates in the borough. |
| Equality | Increase social mobility and inclusion | ...improve physical activity rates for low income population groups? | A significant number of opportunities affecting the lowest income population groups missed | Opportunities missed | A small number of opportunities missed | e.g. support in one parish comes at expense of support elsewhere | No impact on physical activity rates | A small number of opportunities provided | Opportunities provided | A significant number of opportunities provided that benefit the lowest income population groups | 0 | + | A21 corridor is adjacent to the Sherwood, Southborough and High Brooms deprived areas. Developing here increases the likelihood that these could be improved. However, other parts of the borough are ignored. |
| | | ...improve social mobility problems caused by selective grammar schools? | Provision for a new grammar school | Expansion of an existing grammar school | Increase in catchment area of existing grammar school | e.g. grammar school dedicates places for low income families | No impact on selective education | Increase in catchment area of existing non-selective school | Expansion of an existing non-selective secondary school | Provision for a new non-selective secondary school | 0 | 0 | Difficult to score until know exact details of development |
| Health | Improve health and wellbeing, and reduce health inequalities | ...meet demand for elderly care services? | Does not meet existing demand and significantly increases future demand | Does not meet existing demand and increases future demand | Does not meet existing demand | e.g. meets existing demand at expense of future demand or vice versa | Does not impact upon elderly care services | Meets existing demand | Meets existing demand and reduces future demand | Meet existing demand and significantly reduces future demand | HIGH Growing elderly population | 0 | Difficult to score until know exact details of development |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|---|---|---|---|--|---|--|---|--|--|-----------|--|--------------------------|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| ...improve physical activity rates for at risk population groups? | Significantly reduces changes for improvement of physical activity rates for at risk populations | Reduces chances for improvement of physical activity rates for at risk populations | Slightly reduces chances for improvement of physical activity rates for at risk populations | e.g. increasing physical activity rates for some at risk populations comes at the expense of other at risk populations | Neither increases nor reduces physical activity rates | Slightly increases physical activity rates for at risk populations | Increases physical activity rates for at risk populations | Significantly increases physical activity rates for at risk populations | 0 | | Some inactive groups are located in RTW and SB (but not all) so developing here increases the likelihood that money and regeneration will be available to help in these areas only. Assumption that development does not take away from existing green spaces that is used for physical activity or adequately replaces what is taken. | |
| ...address pockets of health deprivation? | Significantly reduces changes for improvement of pockets of health deprivation | Reduces chances for improvement of pockets of health deprivation | Slightly reduces chances for improvement of pockets of health deprivation | e.g. reduces or improves one area of health deprivation at the expense of a different area | Does not impact upon pockets of health deprivation | Will slightly improve or reduce pockets of health deprivation | Will improve or reduce pockets of health deprivation | Will significantly improve or reduce pockets of health deprivation | 0 | | Some inactive groups are located in Pembury and SB (but not all) so developing here increases the likelihood that money and regeneration will be available to help in these areas only. Assumption that development does not take away from existing green spaces that is used for physical activity or adequately replaces what is taken. | |
| ...help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers? | Removes provision of specialist health care or support services and causes significant problems | Removes provision of specialist health care or support services | Removes provision of specialist health care or support services, but accessible services are still available | e.g. helps one illness at the expense of another illness | Does not impact upon specialist health care or support services | Helps with provision of specialist health care or support services but with minimal benefits | Helps with provision of specialist health care or support services | Significantly helps with provision of specialist health care or support services | 0 | | Difficult to score until know exact details of development | |
| ...meet need for green open space and recreation facilities? | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is both too far (more than twice recommended distance) and/or too small (less than half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either too far (e.g. twice recommended distance) and/or too small (e.g. half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either slightly too far (less than twice recommended distance) and/or slightly too small (more than half recommended size) | e.g. Accessible Natural Greenspace is allocated to one population at the expense of a different population | Green open space and recreation facilities not relevant | Meets 1 or 2 Accessible Natural Greenspace Standards | Meets 3 or 4 Accessible Natural Greenspace Standards | Meets all Accessible Natural Greenspace Standards | HIGH TWBC is already behind on these standards | | Assumption that development does not take away existing accessible green space, however, still seems unlikely that high demands for housing will provide sufficient new green space to meet these standards (which the Borough is already behind on). Also, urban areas are less likely to have green open space | |
| ...ensure residents can access heritage assets? | Significantly worsens or prevents access to heritage assets (e.g. severance of access route) | Worsens access to heritage assets (e.g. removes pedestrian access) | Slightly worsens access to heritage assets (e.g. pedestrian access route lengthened) | e.g. access is possible but other factors may prevent visits | Does not impact upon access to heritage assets | Slightly improves access to heritage asset (e.g. pedestrian access route shortened) | Improves access to heritage assets (e.g. provision for new modes of travel) | Significantly improves access to heritage assets (e.g. addition of new access route) | 0 | | Best transport links are from/to main settlements. | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|---|---|--|---|--|--|--|---|---|---|--|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| Heritage | Preserve and enhance historical and cultural heritage assets | Significantly fails to protect, e.g. total demolition of a heritage asset, complete loss a significant contributor in historic area, complete loss of archaeological site, complete loss of element of setting which forms an important part of its significance. | Fails to protect, e.g. partial demolition of a heritage asset, removal of a part of a heritage asset that contributes strongly to significance, partial loss of element of setting that forms part of its significance. | Protection compromised, e.g., causes less than significant harm by partial demolition, removal of part of a heritage asset, or a structure that forms part of its setting. | Protection or enhancement possible but other policies could hinder, e.g. green belt designation, AONB, housing quotas, requirements for commercial use, potential for preventing reuse of historic buildings at risk. | No impact. Does not prevent or cause harm e.g. no impact on the special architectural or historic character of a building, structure or area, or any impact on archaeology | Protects heritage assets from harm or deterioration e.g. allows reuse of heritage assets which prevents deterioration or further harm, stabilises condition of heritage assets, a use which would allow for retention of setting, enables long term appropriate use of asset | Protects and enhances significance, e.g. allows restoration of historic features, setting, allows interpretation, removes detractors to its significance, enables long term optimum viable use | Provides significant enhancement e.g. use which allows for its retention if redundant, a complete restoration of a building at risk, complete restoration of an important part of a conservation area, removal of significantly harmful detractors. | High Assets and settings are often finite or hard to restore once lost | 0 | Focusing on developing considerable growth adjacent to RTW would reduce pressure on the historic environment of RTW but increased population and traffic through the town may still affect setting. | |
| | ...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance? | Significantly worsens provision by the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Worsens provision by the historic environment for the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Prevents enhancement opportunities for and by the historic environment for one of the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Provides potential for enhancement of and by the historic environment but other priorities could hinder | No opportunities for enhancement are available. | Slight enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Significant enhancement opportunities from the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | 0 | Building a cluster of new homes in a new location provides opportunities to ensure needs are met. | | |
| Housing | Provide sufficient housing to meet identified needs | ...meet identified needs for affordable housing? | No provision made for affordable housing and demands increased significantly | No provision made for affordable housing and demands increased | No provision made for affordable housing | e.g. affordable housing needs met in one site/phase/ location at the expense of another | No relevance to affordable housing | A small proportion of affordable housing needs met | Affordable housing needs partially met | Affordable housing needs met in (or near) full | High Housing demands in borough are not being met. | | Building large number of new homes anywhere provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. This strategy would not help address rural needs. |
| | ...meet demand for housing suitable for older people downsizing? | No provision made for older persons housing needs and demands increased significantly | No provision made for older persons housing needs and demands increased | No provision made for older persons housing needs | e.g. older persons housing needs met in one site/phase/ location at the expense of another | No relevance to older persons housing needs | A small proportion of older persons housing needs met | Older persons housing needs partially met | Older persons housing needs met in full | High Housing demands in borough are not being met. | + | Building large number of new homes anywhere provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. | |
| | ...meet demand for 2 and 3 bed market housing to suit expanding families? | No provision made for 2 and 3 bed housing needs and demands increased significantly | No provision made for 2 and 3 bed housing needs and demands increased | No provision made for 2 and 3 bed housing needs | e.g. 2 and 3 bed housing needs met in one site/phase/ location at the expense of another | No relevance to 2 and 3 bed housing demands | A small proportion of demand for 2 and 3 bed market housing met | Some of the demand for 2 and 3 bed market housing met | Demand for 2 and 3 bed market housing met in full | High Housing demands in borough are not being met. | | Building large number of new homes anywhere provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|--|--|---|--|--|--|--|---|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | | | | | | | | | | | | whether there is enough land available to meet all housing needs. |
| | ...make allowances in housing targets due to environmental constraints in the borough? | No allowances made and constraints not given weight | No allowances made and constraints given limited weight | No allowances made but constraints given moderate weight | e.g. allowances made in one location at the expense of another | Not relevant to housing targets | Limited allowances made | Some allowances made | Significant allowances made | 0 | | A21 corridor constrained by Green Belt and AONB but this strategy would take development pressure away from other sensitive parts of the borough. |
| Land use | ...protect Green Belt? | Development would detract from all of the 5 purposes of the Green Belt | Development would detract from 3-4 of the purposes of the Green Belt | Development would detract from 1-2 of the purposes of the Green Belt | e.g. development is not on Green Belt but may benefit or detract from adjacent Green Belt | No impact upon Green Belt or impact is on an area of land that serves none of the 5 purposes of Green Belt | Development would respect the 5 purposes of the Green Belt | Development would respect the 5 purposes of the Green Belt and enhances beneficial use | Development would respect the 5 purposes of the Green Belt and significantly enhances beneficial use | 0 | | Coalescence of Pembury and RTW may be a problem. GB review should ensure that urban and derelict land is regenerated in preference to high quality countryside. |
| | ...develop on previously developed land in preference to greenfield land? | >50% of development located on greenfield land | 10%-50% of development located on greenfield land | Up to 10% of development located on greenfield land | e.g. previous use of land unknown | No impact on land type | Development entirely on previously developed land and adjacent to greenfield | Development entirely on and adjacent to previously developed land | Development located entirely on and surrounded by previously developed land | High. Housing white paper suggests great weight should be applied to suitable b/f | --- | Strategy proposed development primarily on greenfield land. |
| | ...prioritise development on lower grade agricultural soils? | >20ha of development on best and most versatile soils | <20ha of development on best and most versatile soils | Development on agricultural soils of any grade | e.g. grading of agricultural soil unknown | No impact on agricultural soils or no change to soil grading | Protect agricultural soils of any grade | Protect and improve <20ha of best and most versatile soils | Protect and improve >20ha of best and most versatile soils | 0 | | Difficult to score without exact details of soil grading. However, likely that such a large quantity of development in one location would cause the loss of some high quality soils. |
| Landscape | Protect and enhance landscape and townscape | ...protect and enhance the High Weald AONB and historic landscape? | | | | | | | | Great weight as per NPPF | -- | The A21 corridor is entirely within the AONB. Impacts are likely. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|--|--|--|---|---|--|--|--|---|--|--|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...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? | 1) Near full or full loss of ancient woodland 2) Near full or full loss of management opportunities or access | 1) Partial loss of ancient woodland 2) Partial loss of management opportunities or access | 1) Degradation of ancient woodland 2) Scaled down management opportunities or access | e.g. recreation management conflicts with biodiversity management | No impact on ancient woodland | 1) Protection of ancient woodland 2) Improvement to existing management opportunities or access | 1) Protection and enhancement of ancient woodland 2) Addition of management opportunities or access | 1) Protection, enhancement and improve function of ancient woodland 2) Significant addition of management opportunities or access | High AW is a finite habitat | | Difficult to score without exact locations of development. However, NPPF para 118 suggests loss or deterioration of ancient woodland would be refused (unless benefits outweigh the loss). Recent Housing White Paper also places emphasis on protecting ancient woodland. | |
| | ...strengthen Green Infrastructure? | Near full or full loss of GI and/or full loss of management opportunities | Partial loss of GI and/or partial loss of management opportunities or access | Degradation of GI and/or scaled down management opportunities or access | e.g. a combination of negative and positive impacts | No impact on GI or no net loss of GI | Protection of GI and/or improvement to existing management opportunities | Protection and enhancement of GI and/or addition of management opportunities | Protection, enhancement and increase size/function of GI and/or significant addition of management opportunities | 0 | | Difficult to score without exact detail of development locations. However, assumed that there would be no net loss of GI. | |
| | ...protect and enhance landscape and townscape character and quality? | High adverse impacts | Moderate adverse impacts | Minor adverse impacts | e.g. a combination of negative and positive impacts | No visual impacts or impact on landscape and townscape character and quality | Minor positive impacts | Moderate positive impacts | High positive impacts | 0 | | The landscape character type in the A21 corridor is forested plateau and urban fringe farmland. It is very sensitive. Policy to ensure high quality and sympathetic design is required. | |
| Noise | Reduce noise pollution | ...consider noise pollution in Important Areas for Road Noise? | - Increase road noise dramatically in an IARN - Position sensitive receptors in an IARN | - Increase road noise in an IARN - Develop large number of residential housing in an IARN | - Increase road noise slightly in an IARN - Develop residential housing in an IARN | e.g. development is adjacent to an IARN and may contribute to worsening effects | No impact upon an IARN | - Reduce road noise slightly in an IARN - Provide noise mitigation for residents located in an IARN | - Reduce road noise in an IARN - Relocate number of sensitive receptors away from an IARN | - Reduce road noise dramatically in an IARN - Relocate large number of sensitive receptors away from an IARN | HIGH Great control over this issue and more certainty | - | There are 3 IARN in the section of the A21 highlighted as a growth corridor and another 3 in close proximity on the A228. The A21 generally has numerous IARN along its length. Such a large amount of growth in this location is likely to worsen the current situation. It is recommended that sensitive receptors are kept well outside of the IARN. |
| | | ...consider noise pollution from aircraft and trains? | - Position sensitive receptors in flight path or adjacent to main railway | - Develop residential housing in main flight path (20 flights per day or more) or adjacent to main railway | - Develop residential housing on edge of flight path (5-20 flights per day) or near to main railway | e.g. flight path subject to change | No impact upon flight path | - Provide noise mitigation for residents located in flight path or near to main railway | - Relocate number of sensitive receptors away from edge of flight path or adjacent to railway | - Relocate large number of sensitive receptors away from main flight path or adjacent to railway | 0 | | The A21 corridor is mostly outside the flight path and not near to a railway or rail station. |
| Resources | Reduce the impact of resource consumption | ...prevent unsustainable demolition and rebuild projects? | Demolition and rebuild required | Demolition and rebuild encouraged | Demolition and rebuild promoted slightly | e.g. demolished building is unusable and new build is extremely sustainable | Demolition and rebuild not applicable | Demolition and rebuild reduced slightly | Demolition and rebuild reduced | Demolition and rebuild prevented | 0 | ? | Difficult to score without exact detail of locations |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|--|---|--|--|---|--|---|--|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? | Responsible sourcing/low impact materials prohibited | Responsible sourcing/low impact materials strongly discouraged | Responsible sourcing/low impact materials discouraged slightly | e.g. suitable low impact/responsibly sourced material does not currently exist | Responsible sourcing/low impact materials not applicable | Responsible sourcing/low impact materials encouraged slightly | Responsible sourcing/low impact materials strongly encouraged | Responsible sourcing/low impact materials mandatory | 0 | | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| | ...support the contribution to the local economy from tourism? | Tourism strongly discouraged e.g. closure of major attraction | Tourism discouraged | Tourism discouraged slightly | e.g. opening a new attraction reduces visitors to an existing attraction | Tourism not relevant | Tourism supported slightly | Tourism supported | Tourism supported strongly e.g. opening of major attraction | Low Tourism contributes a relatively small amount to local economy | | Developing in a location with good access to the road network may increase car based visitors to more remote attractions e.g. Scotney Castle, Bedgebury |
| | ...support superfast broadband connectivity in final 5% of the borough? | Development in all of the locations of borough not connected to superfast broadband | Development in some of the locations of borough not connected to superfast broadband | Development in a few of the locations of borough not connected to superfast broadband | e.g. speed for a particular location is not known | No impact upon broadband speeds in areas of need. | Development that guarantees superfast connection in a few of the locations of borough not currently connected | Development that guarantees superfast connection in a some of the locations of borough not currently connected | Development that guarantees superfast connection in all of the locations of borough not currently connected | 0 | | Majority of urban areas will already have superfast. However, Sandown Park, Decimus Park (both adjacent to the A21 corridor) still do not. |
| Services and facilities | Improve access to and range of key services and facilities | Loss and poor range of existing key services or facilities | Loss or poor range of existing key services or facilities | Loss or limited range of existing key services or facilities | e.g. improvements in one service and loss of another service | Not relevant to provision of services and facilities | Gain or good range of existing services or facilities | Gain or near full range of existing key services or facilities nearby | Gain or full range of existing key services or facilities and wide range of further services and facilities nearby | High A critical issue when determining where to develop. More weight if a rural settlement. | + | Services in urban areas already suitable and Pembury has a good range of services and facilities. Enhancements would be possible though. |
| | ...retail and leisure growth? (study underway) | Loss and poor range of existing retail and leisure facilities | Loss or poor range of existing retail and leisure facilities | Loss or limited range of existing retail and leisure facilities | e.g. improvements in one facility and loss of another facility | Not relevant to provision of retail and leisure facilities | Gain or good range of existing retail and leisure facilities | Gain or near full range of existing retail and leisure facilities | Gain or full range of existing retail and leisure facilities and wide range of further retail and leisure facilities nearby | 0 | | Sports centres and wide range of shops in RTW and SB urban areas. Care must be taken if proposing a significant amount of retail just outside of the main town centres as this could have a detrimental impact on town centre trade. |
| | ...improve access to services and facilities especially in rural settlements? | Nearest services or facilities only accessible by private car OR existing accessibility worsened significantly | Public transport needed to access services and facilities is infrequent or unreliable OR existing accessibility worsened | Key services and facilities accessible only by public transport OR existing accessibility worsened slightly | Access route undetermined | Not relevant to access to services and facilities | Key services and facilities are within desirable walking distance OR existing accessibility improved slightly | Key services and facilities are within desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved | Key services and facilities are within half the desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved significantly | High A critical issue when determining where to develop. More weight if a rural settlement. | | Developing primarily in urban areas mean most services are easily accessible on foot, especially with Pembury nearby. Walking adjacent to the A21 may not be pleasant though. |
| Travel | Improve travel choice and reduce the need to travel by private vehicle | ...support priority transport projects? | Significant negative impact e.g. multiple projects inhibited | Some negative impact e.g. severe delays | Slight negative impact e.g. project delayed | e.g. one project supported at the expense of another | Priority transport projects unaffected | Minimal support e.g. project recognised or land reserved | Support given to promote one or more projects | 0 | + | Building in the A21 corridor may provide further justification to support lobby for the duelling of the A21 from Kipping's Cross to Lamberhurst, the A228 Colts |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|---|--|---|--|--|---|---|---|---|-------------|---|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...prioritise easy access to train stations within and outside the borough? | Access to train station very difficult (e.g. 10miles+ or no public transport) | Access to train station difficult (e.g. 5-10 miles or very limited public transport) | Access to train station inconvenient (e.g. 3-5 miles or limited public transport) | e.g. easy access but unlikely to be train users | Access to train stations not applicable | Convenient access to train station by private car | Convenient access to train station by public transport | Convenient access to train station by foot | 0 | | Hill improvement scheme and the Pembury Road A264 capacity improvements Access to High Brooms station by public transport. | |
| | ...improve rural bus services and retain viability of urban bus services? | Significant negative impact on bus services (e.g. removal of a bus route) | Bus services worsened (e.g. loss of multiple bus stops or several services per week) | Bus services worsened slightly (e.g. loss of one bus stop or service per week) | e.g. improvements to one service or route come at expense of another | Bus services unaffected | Opportunities to improve bus services available (e.g. new bus stop or additional service each week) | Improvements to bus services (e.g. addition of multiple bus stops or services per week) | Significant positive impact on bus services (e.g. addition of new route) | LOW Bus use is generally unpopular in borough | | Improvements to urban bus services brought about by increased development could be countered by lack of investment in rural areas (and thus associated bus services). | |
| | ...support opportunities for active travel including cycling and walking? | Cycling and walking discouraged e.g. 50+ less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. 10 less cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport would also be better than rural areas so benefit may be small. | |
| Waste | Reduce waste generation and disposal | ...support continued decline in household waste reduction? | Creates barriers to household waste reduction e.g. large number of new homes with no commitment to reduction | Likely to negatively affect the continued decline in household waste e.g. addition of significant number of new homes | Maintains status quo | e.g. causes increase in one stream of household waste and decline in another | Household waste unaffected | Household waste reduction considered | Some commitment and ideas for supporting household waste reduction | Strong commitment and innovative ideas for supporting household waste reduction | 0 | Likely to be an increase with large quantities of development. Assumption that a LP policy would prevent very large quantities | |
| | | ...improve rates of household waste diverted from landfill? | 100% waste to landfill | Approximately 50% waste to landfill | Some waste to landfill e.g. 10% | e.g. reduced waste to landfill possible but may not be achieved in practise | No waste will occur or household waste not relevant | Some waste diverted from landfill e.g. 10% | Approximately 50% waste diverted from landfill | Zero waste to landfill can be achieved. | 0 | ? | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| | | ...reduce construction waste? | Construction waste increased significantly | Construction waste increased | Construction waste increased slightly | e.g. quantity of waste produced will depend on reputation of contractor used | No construction waste will occur or construction waste not relevant | Construction waste decreased slightly | Construction waste decreased | Construction waste decreased significantly | 0 | | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| Water | Manage flood risk and conserve, protect and enhance water resources | ...reduce water consumption rates? | Significantly worsens existing consumption rates | Worsens existing consumption rates | Maintains status quo | e.g. impact upon consumption unclear | No impact on water consumption | Consumption rates reduced to national average | Consumption rates reduced to Building Regulations requirement of 125 lppd | Consumption rates reduced to optional standard of 110 lppd | 0 | | This aspect would be considered through DM policy. Not possible to score at strategy level. It is recommended that the government's higher optional technical standard is implemented, Currently no impacts from flooding in this location. |
| | | ...manage impacts from flooding? | Significantly worsens impacts identified from SFRA | Worsens impacts identified from SFRA | Maintains status quo | e.g. impacts are unknown | No change to flood impacts | Improves impacts from flooding | Significantly improves impacts from flooding | Eliminates impacts from flooding | 0 | + | Assumption that any change to flood risk as a result of this development would be accounted for and mitigated. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--|--|---|--|--|--|--|--|--|----------------------------|-----------|--|--------------------------|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| ...exacerbate flood risk on or off site? | Flood zone 3b and exception test fail | Flood zone 3a and exception test fail | Flood zone 2 and exception test fail | e.g. risk is unknown without further detail | No impact on flood risk | Flood zone 3 but exception test pass and improvements proposed e.g. SUDs | Flood zone 2 but exception test pass and improvements proposed e.g. SUDs | Flood zone 1 | High Legislatively driven. | | A21 corridor is all in flood zone 1 | |
| ...support improvements in groundwater quality? | High risk of contamination to groundwater e.g. source protection Zone 1 and previously contaminated land | Medium risk of contamination to groundwater e.g. source protection Zone 2 and possible previously contaminated land | Some risk of contamination to groundwater e.g. in source protection Zone 3 and unknown existing land contamination | e.g. risk is unknown without further investigation | No impact upon groundwater quality | Some support for improvements in groundwater quality | Support for improvements in groundwater quality | Significant support for improvements in groundwater quality e.g. prevention of intensive agriculture in source protection zone 1 | 0 | | Difficult to score without exact detail of locations. However, it is assumed that there would be no development that would create contamination risk to a SPZ. | |
| ...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities? | Pressures increased significantly | Pressures increased | Pressures increased slightly | e.g. agricultural pressures reduced but water industry pressures increased | No impact upon pressures on water bodies | Pressures reduced slightly | Pressures reduced | Pressures reduced significantly | 0 | | Building a significant amount of residential housing in the borough is unlikely to create additional pressure from the practises that cause most damage (agriculture, water industry and rural land management). Industrial development would require more stringent controls. This is an location specific aspect to be considered through DM policy. | |

Policy 5 - GS5 - New Settlement Growth

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|--|---|---|--|--|--|---|---|-------------------------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Air | Reduce air pollution | ...help meet NO2 and PM10 targets along the A26 in Royal Tunbridge Wells? | Significantly increases traffic in AQMA e.g. >50 vehicles per day | Increases traffic in AQMA e.g. 10 - 50 vehicles per day | Slightly increases traffic in AQMA e.g. <10 vehicles per day | e.g. reduces private car use but increases business or commercial traffic. | Neither increases nor reduces traffic in AQMA | Slightly reduces traffic in AQMA e.g. <10 vehicles per day | Reduces traffic in AQMA e.g. 10-50 vehicles per day | Significantly reduces traffic in AQMA e.g. >50 vehicles per day | High Legislatively driven. | Affect on AQMA would depend on how close to RTW the new settlement is. Developing further away from RTW is recommended to reduce the draw. |
| | | ...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options? | Removes support for improving air quality with significant negative consequences | Removes support for improving air quality | Removes support for improving air quality with minimal negative consequences | e.g. supports local car club but also increases parking for private cars | Neither offers nor removes support for improving air quality | Provides support for improving air quality with minimal benefits | Provides support for improving air quality | Provides support for improving air quality with significant benefits | 0 | Choosing a sustainable location with suitable transport infrastructure would provide opportunities to improve air quality through careful planning and provision of car clubs, public transport etc. |
| | | ...promote forms of active travel including cycling and walking? | Cycling and walking discouraged e.g. >50 less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. <10 cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | Careful planning for provision of all services, facilities and employment, and appropriate active transport infrastructure (cycle and footways), could have a very positive impact upon active travel. |
| | | ...help reduce premature deaths from poor air quality (cause by PM2.5)? | Sensitive receptors inside AQMA | Sensitive receptors in area with busy traffic | Sensitive receptors in area with some traffic | e.g. relocates sensitive receptors into area of equally poor air quality | Health of sensitive receptors unchanged | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors into area with less traffic | Relocates sensitive receptors in area with significantly less traffic and outside AQMA | High Lives at stake. | Concentrating such a large number of new homes in one location is highly likely to worsen local air quality. Extent of negatively could be improved or worsened depending on the exact location of the new settlement. |
| Biodiversity | 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)? | Full loss of a site of biodiversity value | Partial loss of a site of biodiversity value | Degradation of a site of biodiversity value | e.g. improvements to one site come at expense of another site | No impact upon sites of biodiversity value | Protection of site of biodiversity value | Protect and improve site of biodiversity value | Protect, improve and increase size/function of site of biodiversity value | 0 | Such a large quantity of development in one location is extremely likely to cause significant losses for biodiversity. However, comprehensive masterplanning could allow for some biodiversity gains. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|---|--|---|---|---|---|---|--|--|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations? | Likely significant effects definite, no effective mitigation available | Likely significant effects probable, mitigation may be ineffective | Likely significant effects possible, mitigation likely to be effective | e.g. effectiveness of mitigation available to prevent likely significant effects is unknown | No impact upon the Ashdown forest | No or insignificant impact upon the Ashdown Forest and provision of some green space | No or insignificant impact upon the Ashdown Forest disturbance and provision of SAMMS | No or insignificant impact upon the Ashdown Forest disturbance and provision of SANGS | High Ashdown Forest is of international significance | | Difficult to score until know exact location of development |
| | ...support work to improve condition of SSSIs? | Full loss of a SSSI | Partial loss of a SSSI | Degradation of a SSSI | e.g. a combination of negative and positive impacts | Neither improves nor contributes to a decline in the condition of SSSIs | Protection of SSSI | Protect and improve | Protect, improve and increase size/function | High SSSIs are of national significance | | Difficult to score until know exact location of development but assumed that all SSSIs in borough would be protected as a minimum. |
| | ...help support existing business and the growth of new businesses? | - Loss of >500m2 floor space/premises suitable for new businesses - Extremely slow broadband - Extremely limited transport options - Extremely limited availability of staff | - Loss of 250m2 - 500m2 floor space/premises suitable for new businesses - Very slow broadband speed - Very limited transport options - Limited availability of staff | - Loss of up to 250m2 floor space/premises suitable for new businesses - Slow broadband speed - Limited transport options - Limited availability of suitable staff | e.g. suitable premises but no fast broadband | No impact on new business survival | - Gain of up to 250m2 floor space/premises suitable for new businesses - Reasonable broadband speed - Small range of transport options - Small range of suitable staff | - Gain of 250m2 - 500m2 floor space/premises suitable for new businesses - Good broadband speed - Wide range of transport options - Wide range of suitable staff | - Gain of >500m2 floor space/premises suitable for new businesses - Fast broadband speed - Very wide range of transport options - Very wide range of suitable staff | Less weight TW is better than national average (see Economic Needs Assessment) | | Difficult to score until know exact location of development. However, it is likely that a new settlement would be developed with the provision of good transport links and fast broadband speeds in mind and the residential build would provide an available workforce. |
| Business Growth | Encourage business growth and competitiveness | Loss of > 500m2 floor space | Loss of 250m2 - 500m2 floor space | Loss of < 250m2 floor space | e.g. support for one industry associated with a loss for another industry | No impact on wholesale, health and finance industries | Gain of < 250m2 floor space | Gain of 250m2 - 500m2 floor space | Gain of > 500m2 floor space | 0 | +++ | Great potential for provision of a range of new employments |
| | ...prevent loss of economic floor space in preference for housing and other non employment generating uses within Key Employment Areas and other well located employment sites? | > 500m2 economic floor space lost in preference for housing | 250m2 - 500m2 economic floor space lost in preference for housing | < 250m2 economic floor space lost in preference for housing | e.g. viability of existing economic floor space unknown | No impact on economic floor space or economic floor space lost in non-viable location | Housing development preserves existing economic floor space | Housing development preserves existing or provides for more economic floor space | Housing development preserves existing and provides for additional economic floor space | 0 | | Likely that provision of economic floor space would be factored into materplanning of a new settlement. |
| | ...recognise and help develop the rural economy? | Rural economy lost and prevented from developing in the future | Loss for the rural economy | Rural economy diminished | e.g. support for one industry associated with a loss for another industry | No impact on the rural economy | Rural economy protected | Rural economy protected and expanded | Rural economy protected and significantly expanded | 0 | | Difficult to score until know exact location of development |
| Climate Change & Energy | Reduce carbon footprint and adapt to predicted changes | Adaptation measures excluded with significant negative consequences | Adaptation measures excluded | Adaptation measures excluded but with minimal negative consequences | Adaptation measures have negative consequences e.g. drought resilient plants are preferable to invasive species | Adaptation is not possible or no climate change pressures exist in that location | Adaptation measures incorporated but with minimal benefits | Adaptation measures incorporated | Adaptation measures incorporated with significant benefits | 0 | 0 | Difficult to score until know exact details of development. However, seems likely that designing a new settlement from scratch will provide more opportunities to incorporate adaptation measures than a mostly piecemeal development across the borough. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|--|--|--|---|---|---|--|---|--|-------------|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...support reduction in carbon and energy so targets are consistently met? [Nb. short term effects e.g. construction related are considered by Objective 15: Resources] | Increases carbon significantly compromising reduction target | Increases carbon making reduction target difficult to achieve | Maintains status quo. Increases carbon slightly but reduction target is still achievable | e.g. reduces carbon from domestic sources but increases carbon from transport | Neither increases nor reduces carbon | Reduces carbon but unlikely to meet annual target | Meets annual carbon reduction targets | Exceeds annual carbon reduction targets | High Targets are currently not being met. | | Building a large number of new homes is likely to increase carbon and energy demands significantly. However, it is assumed that the new settlement will be located somewhere with sustainable transport (or that sustainable transport links will be provided) to help reduce transport related carbon. Difficult to score until know exact details of development. However, a new separate settlement lends itself to use of biomass as air quality issues are ruled out, biomass boilers can be designed from an early stage and plentiful supply of local fuel can be utilised. |
| | ...support opportunities to utilise biomass in the borough? | Biomass opportunities discouraged with significant negative consequences | Biomass opportunities discouraged | Biomass opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages biomass | Biomass opportunities supported | Biomass opportunities supported and realised | Biomass opportunities supported and realised with significant benefits | 0 | | Centralised heating systems are more likely to be realised in a new settlement as can be planned for from outset. |
| | ...support opportunities to install community heating schemes? | Community heating opportunities discouraged with significant negative consequences | Community heating opportunities discouraged | Community heating opportunities discouraged with minimal negative consequences | e.g. support for biomass in one location removes opportunities in another location | Neither supports nor discourages community heating | Community heating opportunities supported | Community heating opportunities supported and realised | Community heating opportunities supported and realised with significant benefits | Low Opportunities are limited | | |
| Deprivation | ...address pockets of deprivation and encourage regeneration? | Significant regeneration diverted away from a pocket of severe deprivation | Some regeneration activates diverted away from pocket of deprivation | Small amount of regeneration activates diverted away from pockets of deprivation | e.g. regeneration adjacent to a pocket of deprivation may trigger future regeneration but there is no guarantee | No impact upon pockets of deprivation | Small amount of regeneration in a pocket of deprivation | Some regeneration in a pocket of deprivation | Significant regeneration in a pocket of severe deprivation e.g. major housing or retail development | 0 | | Building a new separate settlement is likely to reduce opportunities to regenerate existing deprived areas. |
| | Reduce poverty and assist with regeneration ...reduce rates of fuel poverty? | Energy demand increase of >50% | Energy demand increase of 10% - 50% | Energy demand increase of <10% | e.g. energy saving principles incorporated but users unlikely to be affected by fuel poverty | No impact on fuel poverty | Energy reductions of <10% | Energy reductions of 10% - 50% | Energy reductions of >50% | 0 | | Difficult to score until know exact details of development. However, more likely to have opportunity to develop low energy homes with masterplanning for a new settlement. Recommend that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. Could be incorporated into affordability criteria for new homes. |
| Education | Improve educational attainment and enhance the skills base ...meet demand for school places? | Will increase demand by >50% | Will increase demand by 10-50% | Will increase demand by <10% | New school proposed in long term but impact of demand will be felt in short term | No impact on school places or demand for new places can be accommodated | Will reduce demand by <10% | Will reduce demand by 10-50% | Will reduce demand by >50% | HIGH More pressing need | - | It is assumed that sufficient school places will be accommodated by new settlement as part of the fundamental infrastructure requirement. However, this would not address current shortages in RTW area in the short and medium term. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|--|--|--|---|--|---|--|---|---|--|--|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...continue to support a high proportion of highly qualified residents? | Complete removal of significant support | Reduces support | Small reduction in support | e.g. support for higher education comes at expense of further education | No impact on highly qualified residents | Provides a small amount of support | Provides support | Provide significant support | 0 | | Difficult to score until know exact details of development | |
| Employment | Facilitate and support employment opportunities | ...improving employment opportunities in key wards? | In key wards... - Loss of a significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Extremely poor access to transport - Very poor opportunities for developing new skills | In key wards... - Loss of a number of permanent employment opportunities provided e.g. 10- 50 new jobs - Very poor access to transport - Poor opportunities for developing new skills | In key wards... - Loss of a small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Poor access to transport - Very poor opportunities for developing new skills | e.g. job opportunities at risk but not certain | No impact on employment opportunities in key wards | In key wards... - A small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Reasonable access to transport - Reasonable opportunities for developing new skills | In key wards... - Number of permanent employment opportunities provided e.g. 10- 50 new jobs - Good access to transport - Good opportunities for developing new skills | In key wards... - Significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Very good access to transport - Very good opportunities for developing new skills | LOW Unemployment in borough is very low generally | ? | Difficult to score until know exact location of new settlement |
| Equality | Increase social mobility and inclusion | ...improve physical activity rates for low income population groups? | A significant number of opportunities affecting the lowest income population groups missed | Opportunities missed | A small number of opportunities missed | e.g. support in one parish comes at expense of support elsewhere | No impact on physical activity rates | A small number of opportunities provided | Opportunities provided | A significant number of opportunities provided that benefit the lowest income population groups | 0 | --- | Building a new separate settlement is likely to reduce opportunities to regenerate existing deprived areas. |
| | | ...improve social mobility problems caused by selective grammar schools? | Provision for a new grammar school | Expansion of an existing grammar school | Increase in catchment area of existing grammar school | e.g. grammar school dedicates places for low income families | No impact on selective education | Increase in catchment area of existing non-selective school | Expansion of an existing non-selective secondary school | Provision for a new non-selective secondary school | 0 | | Difficult to score until know exact details of development |
| Health | Improve health and wellbeing, and reduce health inequalities | ...meet demand for elderly care services? | Does not meet existing demand and significantly increases future demand | Does not meet existing demand and increases future demand | Does not meet existing demand | e.g. meets existing demand at expense of future demand or vice versa | Does not impact upon elderly care services | Meets existing demand | Meetings existing demand and reduces future demand | Meet existing demand and significantly reduces future demand | HIGH Growing elderly population | | Difficult to score until know exact details of development |
| | | ...improve physical activity rates for at risk population groups? | Significantly reduces changes for improvement of physical activity rates for at risk populations | Reduces chances for improvement of physical activity rates for at risk populations | Slightly reduces chances for improvement of physical activity rates for at risk populations | e.g. increasing physical activity rates for some at risk populations comes at the expense of other at risk populations | Neither increases nor reduces physical activity rates | Slightly increases physical activity rates for at risk populations | Increases physical activity rates for at risk populations | Significantly increases physical activity rates for at risk populations | 0 | - | The majority of inactive groups are located in main settlements (but not all) so developing separately from these would reduce the likelihood that money and regeneration will be available to help. Assumption that development does not take away from existing green spaces that is used for physical activity or adequately replaces what is taken. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|---|---|---|---|--|---|--|---|--|---|-----------|--|--------------------------|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| ...address pockets of health deprivation? | Significantly reduces changes for improvement of pockets of health deprivation | Reduces chances for improvement of pockets of health deprivation | Slightly reduces chances for improvement of pockets of health deprivation | e.g. reduces or improves one area of health deprivation at the expense of a different area | Does not impact upon pockets of health deprivation | Will slightly improve or reduce pockets of health deprivation | Will improve or reduce pockets of health deprivation | Will significantly improve or reduce pockets of health deprivation | 0 | | Developing separately from existing settlements would reduce the likelihood that money and regeneration will be available to help existing pockets. Assumption that development does not take away from existing green spaces that is used for physical activity or adequately replaces what is taken. However, the pockets are widely distributed across the borough so this score could be improved with joined up masterplanning. | |
| ...help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers? | Removes provision of specialist health care or support services and causes significant problems | Removes provision of specialist health care or support services | Removes provision of specialist health care or support services, but accessible services are still available | e.g. helps one illness at the expense of another illness | Does not impact upon specialist health care or support services | Helps with provision of specialist health care or support services but with minimal benefits | Helps with provision of specialist health care or support services | Significantly helps with provision of specialist health care or support services | 0 | | Difficult to score until know exact details of development | |
| ...meet need for green open space and recreation facilities? | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is both too far (more than twice recommended distance) and/or too small (less than half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either too far (e.g. twice recommended distance) and/or too small (e.g. half recommended size) | Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either slightly too far (less than twice recommended distance) and/or slightly too small (more than half recommended size) | e.g. Accessible Natural Greenspace is allocated to one population at the expense of a different population | Green open space and recreation facilities not relevant | Meets 1 or 2 Accessible Natural Greenspace Standards | Meets 3 or 4 Accessible Natural Greenspace Standards | Meets all Accessible Natural Greenspace Standards | HIGH TWBC is already behind on these standards | | Assumption that development does not take away existing accessible green space, however, still seems unlikely that high demands for housing will provide sufficient new green space to meet these standards (which the Borough is already behind on). Developing a new settlement from scratch provides a better chance that these can be factored in from an early design stage for new residents but it does not address the issues for the rest of the borough. | |
| ...ensure residents can access heritage assets? | Significantly worsens or prevents access to heritage assets (e.g. severance of access route) | Worsens access to heritage assets (e.g. removes pedestrian access) | Slightly worsens access to heritage assets (e.g. pedestrian access route lengthened) | e.g. access is possible but other factors may prevent visits | Does not impact upon access to heritage assets | Slightly improves access to heritage asset (e.g. pedestrian access route shortened) | Improves access to heritage assets (e.g. provision for new modes of travel) | Significantly improves access to heritage assets (e.g. addition of new access route) | 0 | | Difficult to score until know exact location of development | |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|--|---|---|---|---|--|---|--|---|---|---|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| Heritage | Preserve and enhance historical and cultural heritage assets | Significantly fails to protect, e.g. total demolition of a heritage asset, complete loss a significant contributor in historic area, complete loss of archaeological site, complete loss of element of setting which forms an important part of its significance. | Fails to protect, e.g. partial demolition of a heritage asset, removal of a part of a heritage asset that contributes strongly to significance, partial loss of element of setting that forms part of its significance. | Protection compromised, e.g., causes less than significant harm by partial demolition, removal of part of a heritage asset, or a structure that forms part of its setting. | Protection or enhancement possible but other policies could hinder, e.g. green belt designation, AONB, housing quotas, requirements for commercial use, potential for preventing reuse of historic buildings at risk. | No impact. Does not prevent or cause harm e.g. no impact on the special architectural or historic character of a building, structure or area, or any impact on archaeology | Protects heritage assets from harm or deterioration e.g. allows reuse of heritage assets which prevents deterioration or further harm, stabilises condition of heritage assets, a use which would allow for retention of setting , enables long term appropriate use of asset | Protects and enhances significance, e.g. allows restoration of historic features, setting, allows interpretation, removes detractors to its significance, enables long term optimum viable use | Provides significant enhancement e.g. use which allows for its retention if redundant, a complete restoration of a building at risk, complete restoration of an important part of a conservation area, removal of significantly harmful detractors. | High Assets and settings are often finite or hard to restore once lost | + | Difficult to score until know exact location of development. However, it is likely that a new settlement with careful masterplanning could avoid impacts as much as possible. Rural areas away from existing settlements are less likely to contain a high concentration of heritage assets. |
| | ...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance? | Significantly worsens provision by the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Worsens provision by the historic environment for the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Prevents enhancement opportunities for and by the historic environment for one of the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements | Provides potential for enhancement of and by the historic environment but other priorities could hinder | No opportunities for enhancement are available. | Slight enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements | Significant enhancement opportunities from the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements | 0 | Building large number of new homes in a new settlement provides good opportunities to ensure needs are met. | |
| Housing | Provide sufficient housing to meet identified needs | ...meet identified needs for affordable housing? | No provision made for affordable housing and demands increased significantly | No provision made for affordable housing | e.g. affordable housing needs met in one site/phase/ location at the expense of another | No relevance to affordable housing | A small proportion of affordable housing needs met | Affordable housing needs partially met | Affordable housing needs met in (or near) full | High Housing demands in borough are not being met. | | Building large number of new homes anywhere provides opportunities to ensure needs are met. Not clear yet whether there is enough land available to meet all housing needs. This strategy could allow for greater delivery of affordable housing. |
| | ...meet demand for housing suitable for older people downsizing? | No provision made for older persons housing needs and demands increased significantly | No provision made for older persons housing needs and demands increased | No provision made for older persons housing needs | e.g. older persons housing needs met in one site/phase/ location at the expense of another | No relevance to older persons housing needs | A small proportion of older persons housing needs met | Older persons housing needs partially met | Older persons housing needs met in full | High Housing demands in borough are not being met. | ++ | Building large number of new homes anywhere provides opportunities to ensure needs are met. Not clear yet whether there is enough land available to meet all housing needs. |
| | ...meet demand for 2 and 3 bed market housing to suit expanding families? | No provision made for 2 and 3 bed housing needs and demands increased significantly | No provision made for 2 and 3 bed housing needs and demands increased | No provision made for 2 and 3 bed housing needs | e.g. 2 and 3 bed housing needs met in one site/phase/ location at the expense of another | No relevance to 2 and 3 bed housing demands | A small proportion of demand for 2 and 3 bed market housing met | Some of the demand for 2 and 3 bed market housing met | Demand for 2 and 3 bed market housing met in full | High Housing demands in borough are not being met. | | Building large number of new homes anywhere provides opportunities to ensure needs are met. Not clear yet whether there is enough land available to meet all housing needs. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|---|---|---|---|---|--|---|--|---|---|---|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...make allowances in housing targets due to environmental constraints in the borough? | No allowances made and constraints not given weight | No allowances made and constraints given limited weight | No allowances made but constraints given moderate weight | e.g. allowances made in one location at the expense of another | Not relevant to housing targets | Limited allowances made | Some allowances made | Significant allowances made | 0 | | Difficult to score until location is known. This strategy could take development pressure away from other sensitive parts of the borough. However, localised constraints could be significant. It is recommended that the location chosen avoids constraints as much as possible. | |
| | ...protect Green Belt? | Development would detract from all of the 5 purposes of the Green Belt | Development would detract from 3-4 of the purposes of the Green Belt | Development would detract from 1-2 of the purposes of the Green Belt | e.g. development is not on Green Belt but may benefit or detract from adjacent Green Belt | No impact upon Green Belt or impact is on an area of land that serves none of the 5 purposes of Green Belt | Development would respect the 5 purposes of the Green Belt | Development would respect the 5 purposes of the Green Belt and enhances beneficial use | Development would respect the 5 purposes of the Green Belt and significantly enhances beneficial use | 0 | | Difficult to score until know exact location of the development. It is advised that the settlement is positioned outside of the Green Belt. | |
| Land use | Protect soils, and reuse previously developed land and buildings | ...develop on previously developed land in preference to greenfield land? | >50% of development located on greenfield land | 10%-50% of development located on greenfield land | Up to 10% of development located on greenfield land | e.g. previous use of land unknown | No impact on land type | Development entirely on previously developed land and adjacent to greenfield | Development entirely on and adjacent to previously developed land | Development located entirely on and surrounded by previously developed land | High. Housing white paper suggests great weight should be applied to suitable b/f | --- | Strategy proposed development primarily on greenfield land. |
| | | ...prioritise development on lower grade agricultural soils? | >20ha of development on best and most versatile soils | <20ha of development on best and most versatile soils | Development on agricultural soils of any grade | e.g. grading of agricultural soil unknown | No impact on agricultural soils or no change to soil grading | Protect agricultural soils of any grade | Protect and improve <20ha of best and most versatile soils | Protect and improve >20ha of best and most versatile soils | 0 | | Difficult to score without exact details of soil grading. However, likely that such a large quantity of development in one location would cause the loss of high quality soils. |
| Landscape | Protect and enhance landscape and townscape | ...protect and enhance the High Weald AONB and historic landscape? | 1) Near full or full loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/pattern: - near completely or completely out of keeping with existing settlement | 1) Partial loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/pattern: - out of keeping with existing settlement | 1) Degradation of: - exposed geology - gills, streams, ponds - woodland - fields and heath - routeway 2) Scale/setting/pattern: - slightly out of keeping with existing settlement | e.g. exposed geology protected but pond degraded or one routeway diverted and another restored or improvements to settlement edge but development is still out of scale | No impact on the AONB | 1) Protection of: - exposed geology - gills, streams, ponds - routeway - woodland (W1) - fields and heath - routeway 2) Scale/setting/pattern: - generally in keeping with existing settlement - no significant harm | 1) Protection & improvement of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath - routeway 2) Scale/setting/pattern: - in keeping with existing settlement - no harm | 1) Protection, improvement & increase size/function of: - exposed geology - gills, streams, ponds - routeway - woodland (W2) - fields and heath - routeway 2) Scale/setting/pattern: - in keeping with and enhances existing settlement | Great weight as per NPPF | ? | Difficult to score without knowledge of settlement location. It is advised that the settlement is positioned well outside of the AONB. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|---|--|--|--|---|---|--|--|--|---|---|---|--|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...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? | 1) Near full or full loss of ancient woodland 2) Near full or full loss of management opportunities or access | 1) Partial loss of ancient woodland 2) Partial loss of management opportunities or access | 1) Degradation of ancient woodland 2) Scaled down management opportunities or access | e.g. recreation management conflicts with biodiversity management | No impact on ancient woodland | 1) Protection of ancient woodland 2) Improvement to existing management opportunities or access | 1) Protection and enhancement of ancient woodland 2) Addition of management opportunities or access | 1) Protection, enhancement and improve function of ancient woodland 2) Significant addition of management opportunities or access | High AW is a finite habitat | | Difficult to score without exact locations of development. However, NPPF para 118 suggests loss or deterioration of ancient woodland would be refused (unless benefits outweigh the loss). Recent Housing White Paper also places emphasis on protecting ancient woodland. | |
| | ...strengthen Green Infrastructure? | Near full or full loss of GI and/or full loss of management opportunities | Partial loss of GI and/or partial loss of management opportunities or access | Degradation of GI and/or scaled down management opportunities or access | e.g. a combination of negative and positive impacts | No impact on GI or no net loss of GI | Protection of GI and/or improvement to existing management opportunities | Protection and enhancement of GI and/or addition of management opportunities | Protection, enhancement and increase size/function of GI and/or significant addition of management opportunities | 0 | | Difficult to score without knowledge of settlement location. However, seems likely that such a large development in one single location would result in loss of greenfield or fragmentation of GI. | |
| | ...protect and enhance landscape and townscape character and quality? | High adverse impacts | Moderate adverse impacts | Minor adverse impacts | e.g. a combination of negative and positive impacts | No visual impacts or impact on landscape and townscape character and quality | Minor positive impacts | Moderate positive impacts | High positive impacts | 0 | | Difficult to score until know exact location of the development. However, building a new settlement from scratch provides the opportunity to develop a unified character and sense of place. It is advised that the settlement is positioned in an area where existing landscape character could be enhanced. | |
| Noise | Reduce noise pollution | ...consider noise pollution in Important Areas for Road Noise? | - Increase road noise dramatically in an IARN - Position sensitive receptors in an IARN | - Increase road noise in an IARN - Develop large number of residential housing in an IARN | - Increase road noise slightly in an IARN - Develop residential housing in an IARN | e.g. development is adjacent to an IARN and may contribute to worsening effects | No impact upon an IARN | - Reduce road noise slightly in an IARN - Provide noise mitigation for residents located in an IARN | - Reduce road noise in an IARN - Relocate number of sensitive receptors away from an IARN | - Reduce road noise dramatically in an IARN - Relocate large number of sensitive receptors away from an IARN | HIGH Great control over this issue and more certainty | Difficult to score without knowledge of settlement location. However, there is a high risk that such large amount of growth would create significant movements in new locations and thus warrant a new IARN. It is hoped that this effect can be lessened with careful design. | |
| | | ...consider noise pollution from aircraft and trains? | - Position sensitive receptors in flight path or adjacent to main railway | - Develop residential housing in main flight path (20 flights per day or more) or adjacent to main railway | - Develop residential housing on edge of flight path (5-20 flights per day) or near to main railway | e.g. flight path subject to change | No impact upon flight path | - Provide noise mitigation for residents located in flight path or near to main railway | - Relocate number of sensitive receptors away from edge of flight path or adjacent to railway | - Relocate large number of sensitive receptors away from main flight path or adjacent to railway | 0 | | Difficult to score without exact location of development. |
| Resources | Reduce the impact of resource consumption | ...prevent unsustainable demolition and rebuild projects? | Demolition and rebuild required | Demolition and rebuild encouraged | Demolition and rebuild promoted slightly | e.g. demolished building is unusable and new build is extremely sustainable | Demolition and rebuild not applicable | Demolition and rebuild reduced slightly | Demolition and rebuild reduced | Demolition and rebuild prevented | 0 | ? | Difficult to score without knowledge of settlement location. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria | |
|--------------------------|--|--|--|---|--|--|---|--|---|---|-------------|--|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | | |
| | ...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding? | Responsible sourcing/low impact materials prohibited | Responsible sourcing/low impact materials strongly discouraged | Responsible sourcing/low impact materials discouraged slightly | e.g. suitable low impact/responsibly sourced material does not currently exist | Responsible sourcing//low impact materials not applicable | Responsible sourcing/low impact materials encouraged slightly | Responsible sourcing/low impact materials strongly encouraged | Responsible sourcing/low impact materials mandatory | 0 | | This aspect would be considered through DM policy. Not possible to score at strategy level. | |
| | ...support the contribution to the local economy from tourism? | Tourism strongly discouraged e.g. closure of major attraction | Tourism discouraged | Tourism discouraged slightly | e.g. opening a new attraction reduces visitors to an existing attraction | Tourism not relevant | Tourism supported slightly | Tourism supported | Tourism supported strongly e.g. opening of major attraction | Low Tourism contributes a relatively small amount to local economy | | Difficult to score without knowledge of settlement location. | |
| | ...support superfast broadband connectivity in final 5% of the borough? | Development in all of the locations of borough not connected to superfast broadband | Development in some of the locations of borough not connected to superfast broadband | Development in a few of the locations of borough not connected to superfast broadband | e.g. speed for a particular location is not known | No impact upon broadband speeds in areas of need. | Development that guarantees superfast connection in a few of the locations of borough not currently connected | Development that guarantees superfast connection in a some of the locations of borough not currently connected | Development that guarantees superfast connection in all of the locations of borough not currently connected | 0 | | Difficult to score without knowledge of settlement location. However, it is assumed that superfast broadband would be provided to all new homes in a new settlement. | |
| Services and facilities | Improve access to and range of key services and facilities | Loss and poor range of existing key services or facilities | Loss or poor range of existing key services or facilities | Loss or limited range of existing key services or facilities | e.g. improvements in one service and loss of another service | Not relevant to provision of services and facilities | Gain or good range of existing services or facilities | Gain or near full range of existing key services or facilities nearby | Gain or full range of existing key services or facilities and wide range of further services and facilities nearby | High A critical issue when determining where to develop. More weight if a rural settlement. | +++ | It is assumed that a new settlement would provide for all key services and facilities. | |
| | ...retail and leisure growth? (study underway) | Loss and poor range of existing retail and leisure facilities | Loss or poor range of existing retail and leisure facilities | Loss or limited range of existing retail and leisure facilities | e.g. improvements in one facility and loss of another facility | Not relevant to provision of retail and leisure facilities | Gain or good range of existing retail and leisure facilities | Gain or near full range of existing retail and leisure facilities | Gain or full range of existing retail and leisure facilities and wide range of further retail and leisure facilities nearby | 0 | | It is assumed that a new settlement would provide for all suitable retail and leisure facilities. | |
| | ...improve access to services and facilities especially in rural settlements? | Nearest services or facilities only accessible by private car OR existing accessibility worsened significantly | Public transport needed to access services and facilities is infrequent or unreliable OR existing accessibility worsened | Key services and facilities accessible only by public transport OR existing accessibility worsened slightly | Access route undetermined | Not relevant to access to services and facilities | Key services and facilities are within desirable walking distance OR existing accessibility improved slightly | Key services and facilities are within desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved | Key services and facilities are within half the desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved significantly | High A critical issue when determining where to develop. More weight if a rural settlement. | | It is assumed that a new settlement would ensure all key services and facilities are very easily accessible. | |
| Travel | Improve travel choice and reduce the need to travel by private vehicle | ...support priority transport projects? | Significant negative impact e.g. multiple projects inhibited | Some negative impact e.g. severe delays | Slight negative impact e.g. project delayed | e.g. one project supported at the expense of another | Priority transport projects unaffected | Minimal support e.g. project recognised or land reserved | Support given to promote one or more projects | Significant support e.g. multiple projects promoted or accelerated timescales | 0 | ++ | Difficult to score without knowledge of the exact location of the development but support is unlikely for all project except perhaps enhancing a cycling network. |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--------------------------|---|---|--|---|--|--|---|---|---|---|----------------------------|---|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| | ...prioritise easy access to train stations within and outside the borough? | Access to train station very difficult (e.g. 10miles+ or no public transport) | Access to train station difficult (e.g. 5-10 miles or very limited public transport) | Access to train station inconvenient (e.g. 3-5 miles or limited public transport) | e.g. easy access but unlikely to be train users | Access to train stations not applicable | Convenient access to train station by private car | Convenient access to train station by public transport | Convenient access to train station by foot | 0 | | Difficult to score without knowledge of the exact location of the development but it is assumed that access to a train station will be key to choosing a suitable location. |
| | ...improve rural bus services and retain viability of urban bus services? | Significant negative impact on bus services (e.g. removal of a bus route) | Bus services worsened (e.g. loss of multiple bus stops or several services per week) | Bus services worsened slightly (e.g. loss of one bus stop or service per week) | e.g. improvements to one service or route come at expense of another | Bus services unaffected | Opportunities to improve bus services available (e.g. new bus stop or additional service each week) | Improvements to bus services (e.g. addition of multiple bus stops or services per week) | Significant positive impact on bus services (e.g. addition of new route) | LOW Bus use is generally unpopular in borough | | Investment in a new settlement is extremely likely to involve provision of new bus services that could provide knock-on benefit to adjacent rural areas. Extent of benefit will depend on location chosen for the new settlement. Design for a new settlement could easily incorporate measures to ensure all necessary services and facilities are easily accessible by foot or cycle, routes are safe and infrastructure such a bike racks are readily available. |
| | ...support opportunities for active travel including cycling and walking? | Cycling and walking discouraged e.g. 50+ less cyclists or walkers | Cycling and walking discouraged e.g. 10-50 less cyclists or walkers | Cycling and walking discouraged but with minimal effects e.g. 10 less cyclists or walkers | e.g. walking promoted but cycling discouraged | Cycling and walking not promoted nor discouraged | Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers | Cycling and walking promoted e.g. 10-50 new cyclists or walkers | Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers | 0 | | |
| Waste | Reduce waste generation and disposal | ...support continued decline in household waste reduction? | Creates barriers to household waste reduction e.g. large number of new homes with no commitment to reduction | Likely to negatively affect the continued decline in household waste e.g. addition of significant number of new homes | Maintains status quo | e.g. causes increase in one stream of household waste and decline in another | Household waste unaffected | Household waste reduction considered | Some commitment and ideas for supporting household waste reduction | Strong commitment and innovative ideas for supporting household waste reduction | 0 | Likely to be an increase with large quantities of development. Assumption that a LP policy would prevent very large quantities |
| | | ...improve rates of household waste diverted from landfill? | 100% waste to landfill | Approximately 50% waste to landfill | Some waste to landfill e.g. 10% | e.g. reduced waste to landfill possible but may not be achieved in practise | No waste will occur or household waste not relevant | Some waste diverted from landfill e.g. 10% | Approximately 50% waste diverted from landfill | Zero waste to landfill can be achieved. | 0 | ? This aspect would be considered through DM policy. Not possible to score at strategy level. |
| | | ...reduce construction waste? | Construction waste increased significantly | Construction waste increased | Construction waste increased slightly | e.g. quantity of waste produced will depend on reputation of contractor used | No construction waste will occur or construction waste not relevant | Construction waste decreased slightly | Construction waste decreased | Construction waste decreased significantly | 0 | This aspect would be considered through DM policy. Not possible to score at strategy level. |
| Water | Manage flood risk and conserve, protect and enhance water resources | ...reduce water consumption rates? | Significantly worsens existing consumption rates | Worsens existing consumption rates | Maintains status quo | e.g. impact upon consumption unclear | No impact on water consumption | Consumption rates reduced to national average | Consumption rates reduced to Building Regulations requirement of 125 lppd | Consumption rates reduced to optional standard of 110 lppd | 0 | This aspect would be considered through DM policy. Not possible to score at strategy level. It is recommended that the government's higher optional technical standard is implemented, |
| | | ...manage impacts from flooding? | Significantly worsens impacts identified from SFRA | Worsens impacts identified from SFRA | Maintains status quo | e.g. impacts are unknown | No change to flood impacts | Improves impacts from flooding | Significantly improves impacts from flooding | Eliminates impacts from flooding | 0 | ? Difficult to score without exact detail of settlement location. |
| | | ...exacerbate flood risk on or off site? | Flood zone 3b and exception test fail | Flood zone 3a and exception test fail | Flood zone 2 and exception test fail | e.g. risk is unknown without further detail | No impact on flood risk | Flood zone 3 but exception test pass and improvements proposed e.g. SUDs | Flood zone 2 but exception test pass and improvements proposed e.g. SUDs | Flood zone 1 | High Legislatively driven. | Such a large quantity of development in one greenfield location is likely to alter local flood risk. However, it is difficult to score confidently without exact detail of settlement |

| Sustainability Objective | Does the policy/allocation/objective..... | Score ✓ | | | | | | | | Weighting | Final Score | Decision Making Criteria |
|--|--|---|--|--|--|--|---|--|----------------------|-----------|--|--------------------------|
| | | --- Very Negative | -- Negative | - Slightly Negative | ? Unknown or Mixed | 0 Neutral | + Slightly Positive | ++ Positive | +++ Very Positive | | | |
| ...support improvements in groundwater quality? | High risk of contamination to groundwater e.g. source protection Zone 1 and previously contaminated land | Medium risk of contamination to groundwater e.g. source protection Zone 2 and possible previously contaminated land | Some risk of contamination to groundwater e.g. in source protection Zone 3 and unknown existing land contamination | e.g. risk is unknown without further investigation | No impact upon groundwater quality | Some support for improvements in groundwater quality | Support for improvements in groundwater quality | Significant support for improvements in groundwater quality e.g. prevention of intensive agriculture in source protection zone 1 | 0 | | location Difficult to score without exact detail of locations. However, it is assumed that the settlement would not be contamination risk to a SPZ. | |
| ...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities? | Pressures increased significantly | Pressures increased | Pressures increased slightly | e.g. agricultural pressures reduced but water industry pressures increased | No impact upon pressures on water bodies | Pressures reduced slightly | Pressures reduced | Pressures reduced significantly | 0 | | Building a significant amount of residential housing in the borough is unlikely to create additional pressure from the practises that cause most damage (agriculture, water industry and rural land management). Industrial development would require more stringent controls. This is an location specific aspect to be considered through DM policy. | |

Appendix C

Interim Sustainability Appraisal 2017 Responses to Representations Report

| Name/ Organisation | Comment Number | Question 1 - Do you have any comments regarding this method for scoring the various aspects of the new Local Plan against the sustainability objectives? | Question 2 - Do you think there are any further reasonable alternatives to the five proposed growth strategy options that should be considered by the Sustainability Appraisal? | Question 3 - Do you have any comments regarding the way the scoring has been interpreted and the conclusions and recommendations that have been made in Chapter 5? | Question 4 - Please provide any additional comments about this document | TWBC Response | TWBC Recommendation |
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| The Access Group | SA_1 | No, however, the above will dramatically affect the scoping and methodology process, as clearly it will introduce new subjects and have additional affects on the built footprint as set out in paragraph 3.3 Baseline Data. | <p>Section 4: SUSTAINABILITY APPRAISAL</p> <p>With regard to paragraph 4.1.1. the Seven Strategic Objectives: Items 3 Infrastructure & 4 Housing - will require a massive change to meet the independent access requirements set out in Article 9 & 19 of UNCRDP & UKDS 2012 and to meet the requirement of "disability specific" and "irrespective of cost".</p> <p>Note:</p> <p>The Equality Act 2010 ironically requires that "disabled people are treated more favourably than other groups to enable and empower them to take a full part in society". Article 8 & 9 of The Human Rights Act 1998 makes similar requirements which have formed the basis of Case Law in DDA outcomes post enactment in 1998. Likewise, EEC Directives relating to the rights and needs of disabled people remain in force, but have, so far, been ignored by TWBC; although TWBC & KCC did comply with ESLG 2000, by both producing a Disability Strategy in 2001 which has ensured that both cannot avoid any prosecution for failing to comply according to the Cabinet Office.</p> <p>In all other respects we considered the Sustainability Appraisal covered all elements for the purpose of the LDP.</p> | <p>CONCLUSIONS AND RECOMMENDATIONS FOR LDP:</p> <p>Our members thought the scoring process was robust.</p> | <p>The Team have considered the questions asked in this consultation based upon the fact that the Local Development Plan is being extended beyond 2025.</p> <p>2025 is the compliance date for meeting total compliance with all the articles of the UN Convention on the Rights of Disabled People (UNCRDP), adopted by the UK in 2000 and Formerly Ratified by parliament in 2009, leading to the legally binding and enforceable UK Disability Strategy 2012 (UKDS) and its Action Plan to meeting total compliance with the UNCRDP by the end of 2025.</p> <p>The Cabinet Office and the Planning Minister both confirmed that "the articles of the Convention were non negotiable and must be complied with by 2025, or sooner if resources permit". The Cabinet Office in its response made clear that the then Prime Minister Tony Blair, a clever lawyer, had introduced into UK Law, by the back door via The Equality Standards in Local Government Targets 2000 (ESLG), a legal requirement for all government to "adopt and fully comply" with UNCRDP also known as the social model. The UK Supreme Court in recent social care and disability access decisions have accepted and ruled that UNCRDP is "stand alone" not part of The Equality Act 2010, but additional to it.</p> <p>The Equality Act 2010 incorporated within it, with immediate enactment, the DDA Acts 1995 & 2005; The DDA Regulations relating to Bus & Coaches, Rail Vehicles etc.; The Public Authorities Disabilities Equality Duty (England) Regulations 2005 and all regulatory guidance issued post 1995.</p> <p>We are aware that the DfL&G; DfT: DfB & DWP are now in the process of updating regulations affecting disabled people, as you are aware from the recent Inspector's Direction supported by the Planning Minister in relation to developers and the intention to include the updated Disability Policy of the Department for Transport "Inclusive Mobility" within Part M of the Building Regulations to ensure total compliance by both developers and local</p> | <p>Q1 – The subjects or topics that are considered within this methodology was determined at 'Stage A – Scoping' stage. The final list of topics being applied in this report are those that have been agreed with various consultees (both statutory and non statutory) and felt to be appropriate and relevant to the current and future issues that the borough faces. The approach will be updated should the evidence based change dramatically. Note: the Sustainability Appraisal is unable to assess detailed design stage</p> <p>Q2 – The strategic objectives detailed in paragraph 4.1.1 were devised outside of the Sustainability Appraisal process. Recommendations have been made for how these could be improved from a sustainability perspective. Consideration has been given to whether compliance with the Equality Act is an aspect that needs consideration under the 'Equality' objective of the SA.</p> <p>The subsequent SA report will include additional guide questions under 'Equality' SA objective to ensure compliance with the Equality Act 2010 and the UN Convention on the Rights of Disabled People (UNCRDP):</p> <p>1. Do the Policies of the draft Local Plan promote</p> | Q1 – 4 – No further recommendation. |

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| | | | | | <p>planning authorities.</p> <p>The principal issues have been outlined in some detail within the response to the updated LDS, but will cover all aspects of independent access; independent living; independently accessible housing (which will increase the width and interior design of all new-build and refurbished buildings, dwellings and workplaces).</p> <p>[TWBC: responses to Questions 1, 2 and 3 have been input into the corresponding Question boxes].</p> <p>FURTHER COMMENTS:</p> <p>This may not be the correct place for this but the members of the team suggested that within this section there should be recommendations for solutions, for example:</p> <ul style="list-style-type: none"> • workplaces and specialist care homes where there is a large use of water, should be required to have as part of the development an internal water recycling plant • where care homes or sheltered accommodation for the elderly are planned, as a condition of the application, the developers/owners, depending on the numbers of persons house, should deposit with our local NHS Acute Trust an annual sum of money to cover the additional costs of pressures on A&E, Out Patients and Elective Surgery. For example, based upon £10000 per person - 20 people £200000 per annum generated. <p>This may seem harsh, but it would enable us to make better use of our limited water needs and support effectively our local acute hospital's as funding is gradually reduced.</p> <p>The working group team wished to express their appreciation of the clarity, both in the LDP consultation document and the Sustainability Appraisal consultation document.</p> | <p>independent access to facilities for people with the mobility, sensory and cognitive impairments?</p> <p>2. Do the Policies of the draft Local Plan promote independently accessible housing, i.e. the policy that promotes the additional technical housing standard for accessibility and wheelchairs?</p> <p>Objective 9 'Health and Well-being' a guide question has been revised to '...meet need for accessible green open space and recreation facilities for all'.</p> <p>Q3 – No response necessary.</p> <p>Q4 – Comments on Equality Act are noted. With regards to the further comments, recommendations will be made for how the negatively scoring aspects of sustainability could be improved for each potential allocated site.</p> | |
| Kent County Council (Flood and | SA_2 | | | | <p>Thank you for your consultation in relation to the above planning application.</p> <p>Kent County Council as Lead Local Flood Authority</p> | <p>Q1 – 3 – No response necessary.</p> <p>Q4 – Agreed. The suggested</p> | <p>Q 1- 3 – No recommendations necessary.</p> |

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| Water Management) | | | | | <p>have the following comments:</p> <p>We have no comment to make to questions 1-3 of the Sustainability Appraisal Response form, however with regards to question 4 a couple of minor observations:</p> <p>The Sustainability Appraisal Scoping Report Dated October 2016 in Table 6 refers to Sustainable Objective 19 as being "Manage flood risk and conserve, protect and enhance water resources" but the latest Sustainability Appraisal Issues and Options Report refers to Sustainable Objective 19 as "Reduce flood risk and conserve, protect and enhance water resources" whilst this may seem minor we did specifically advise the use of Manage over Reduce in our response to Consultation on Sustainability Appraisal Scoping Report in July 2016 as being more appropriate.</p> <p>Table 4 of the SA Compatibility testing of Local Plan objectives against the Sustainability Appraisal objectives gives the Leisure Activities objective as having no clear relationship to that of the Water SA Objective, I would argue that this is not necessarily the case as when looking at managing flood risk on a new development site it may be necessary to create or utilise existing large attenuation features which can also be used for leisure activities. For example (although not TWBC) the Eastern Quarry development in Ebbsfleet has a large lake at it's centre which is essential to managing flood risk and is also used for recreational and leisure activities.</p> | <p>wording change was corrected in both the Scoping Report and the scoring tables for this Issues and Options SA Report. However, an error had crept in such that the old wording was still being used in table 2.</p> <p>Overlooking of the compatibility between leisure and managing flood risk is agreed.</p> | <p>Q4 – Wording to be corrected as suggested in Tables 2, 4, 5 and 6, and associated changes to paragraph 4.1.7. Changes to chapter 5 are not necessary.</p> |
| Paddock Wood Town Council | SA 3 | No | <p>The option of a cross boundary settlement with adjacent authority.</p> <p>The option of another authority taking some of the housing numbers for Tunbridge Wells.</p> | <p>Should consider whether enough emphasis has been given for the need for economic development land to be in the same place as the housing to provide sustainable employment and not increase traffic and travel.</p> <p>For options 2 and 3 – Has enough consideration been given to the difficulty of securing infrastructure development with a lot of smaller developments rather than concentrating resources in a way that would result in better provision at the least cost.</p> <p>Has enough weight been given to the major increase in traffic levels that would result from placing houses in the smaller settlements where car ownership is pretty much essential.</p> <p>Para 5.2.4- Query whether it is feasible to achieve the</p> | <p>Comprehensive document outlining all the variables but the interpretation of the results will be crucial to it's value in this process.</p> | <p>Q1 – no response necessary.</p> <p>Q2 – These options are not yet being pursued as we don't yet know whether there are enough suitable sites within the borough for development. If appropriate, appraisals for these sorts of alternatives would be carried out at Preferred Options stage or beyond.</p> <p>Q3 – The employment objective gives more positive scores for employment sites that have good transport links. Likewise, the business</p> | <p>Q1 – no recommendation necessary.</p> <p>Q2 – Paragraph 4.2.6 added to chapter 4 to explain why these alternatives have not yet been appraised.</p> <p>Q3 – No recommendation necessary</p> <p>Q4 – No recommendation necessary</p> |

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| | | | | necessary mitigations in the real world. They seem aspirational rather than achievable. | | <p>growth objective gives more positive scores for sites that have suitable transport options and available of suitable staff.</p> <p>Infrastructure provision is considered by the education, travel and services & facilities objectives. Options 2 and 3 both score more negatively on all these issues accept education which has common issues across the borough. The concept of better provision with larger settlements is inherent to Option 5. However, concentrating large efforts in one location may detract from finding solutions for existing problems in other areas of the borough.</p> <p>Congestion is considered indirectly via numerous objectives (air, biodiversity, carbon, travel).</p> <p>All the recommendations made are based upon practice seen elsewhere in other authorities so are achievable.</p> <p>Q4 – Agreed. Results interpretation and recommendations will form part of the SA for all potential allocated sites.</p> | |
| Horsm onden Parish Council | SA 4 | No comments. | A combination of strategies 2&4 | Mitigation of adverse effects costs money and the percentage success directly relates to the amount of money spent. Community Infrastructure Levies or section 106 money from developers will be limited therefore mitigation will be limited. | <p>With regards to business growth, the document refers to 'recognising and helping to develop the rural economy'. Economic areas in the options so not specifically mention the rural economy. Economic growth in rural areas is not always sympathetic to the rural economy, it could be industrial units in a rural setting which is not the 'rural economy'.</p> <p>With regards to housing and meeting the demand for housing suitable for older people downsizing,</p> | <p>Q1 – No response necessary.</p> <p>Q2 – Combined strategies have not yet been appraised but are considered in paragraph 5.2.8.</p> <p>If a combined strategy is considered to be a realistic and reasonable alternative, a sustainability appraisal of</p> | <p>Q1-3 – No recommendations necessary.</p> <p>Q4 – Clarification text as to definition of the rural economy has been added to Table 1 of the Scoping Report where the phrase is first</p> |

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| | | | | | this needs to be both affordable and market housing. | <p>the combined approach will be undertaken at the next stages of the Local Plan development</p> <p>Q3 – Success of mitigation proposals depends on many factors. Experiences of neighbouring authorities have been considered whilst preparing the recommendations.</p> <p>Q4 – The rural economy was found to be a key local issue in the Scoping Stage and is also mentioned in paragraph 28 of the NPPF. In this context, it is assumed to mean rural-land based activities such as agriculture.</p> <p>2-3 bedroom market housing is considered in the indicators for the housing objectives alongside the needs for affordable housing (see table 9).</p> | <p>mentioned.</p> <p>No further recommendations necessary.</p> |
| RTW Town Forum (Strate- gic Plannin- g Workin- g Group) | SA_5 | No, but we note that the methodology appears adequately to identify the issues. | We are very sceptical as to whether the kind of growth required by the assessments of housing need in the 2015 SHMA can be provided in the Borough without unacceptable consequences for long term sustainability. It seems that the assumptions underlying the SHMA assessments cannot be seriously challenged. We trust that the various legal constraints to development in particular areas and particular circumstances will be evoked in formulating the draft Local Plan. There seem to be no further reasonable alternatives to consider. Of the alternatives, option 5 offers the best long term prospect of the least overall damage to existing settlements and to Royal Tunbridge Wells in particular. | <p>The sustainability issues are particularly well documented in the Appraisal Report. They are also particularly problematic as <i>the evidence referred to indicates that any significant growth scenario for the town of Royal Tunbridge Wells (and in general for the whole borough of Tunbridge Wells) would normally fail to be justified because of its negative impact on many of the important indicators for well-being of the population.</i> These include</p> <ul style="list-style-type: none"> • air quality (which is rising to the top of the agenda nationally) • noise, particularly in the Important Areas for Road Noise (IARNs) • land use, landscape loss or degradation in the Green Belt/AONB • long term water and waste water security and resources • biodiversity • climate change and energy <p>These issues, which the Issues and Options Objectives seek to improve rather than degrade, (objectives</p> | <p>Sustainability policies should robustly tackle existing air and noise pollution problems in RTW and ensure that any new development within the town or elsewhere in the borough does not add to it. This is one of the greatest single issues facing any community and ignoring it would entail significant health risks for major sections of the population.</p> <p>There could also be greater discussion of the transport implications of growth scenarios anywhere in the borough. Wherever such growth may take place, it would have varying degrees of negative consequences for the town of Royal Tunbridge Wells in terms of road traffic and congestion. Some mitigation might be envisaged. However, without considerable capital outlay (measured in £Millions) on safe and attractive green travel infrastructure <i>in advance</i> of any growth, such mitigation would be found to be an ineffectual fig leaf to cover a wholly unsustainable policy option. We recognise that TWBC itself may have only limited opportunities to provide the</p> | <p>Q1 -2 – Noted. No response necessary</p> <p>Q3 – The conflicts raised have also been recognised by this Sustainability Appraisal report in Chapter 4.</p> <p>Q4 – Noise and Air issues are considered under two separate Objectives.</p> <p>Congestion is considered indirectly via numerous objectives (air, biodiversity, carbon, travel).</p> <p>Affordable housing is considered in the indicators for the housing objectives (see table 9).</p> <p>At this stage, the SA is testing</p> | Q1-4 – No recommendations necessary. |

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| | | | | <p>strongly supported by the Town Forum), are clearly stated to be incompatible with projected housing growth and the consequent need for physical and community infrastructure of all kinds to support it, without substantial mitigation.</p> <p>Mitigation measures proposed to minimise this negative balance are either recognised to be uncertain or likely to be inadequate. <i>It is regrettable that in spite of these evident constraints, TWBC is being effectively coerced by central government policy to place housing need, as calculated on national criteria, above many of the other factors that contribute to wellbeing in the local population</i>. We recognise that this is a planning straitjacket which may reduce the opportunities for emergence of a Local Plan which commands widespread support across the whole borough.</p> | <p>necessary funding.</p> <p>Low housing densities on a number of recent market housing developments in the borough have been wasteful of a very precious land resource. We would hope to see TWBC insist on more appropriate densities under the new Local Plan. We have internal expertise on housing density calculation within the Town Forum which we shall be happy to put at the disposal of the Council in considering allocations on future sites.</p> <p>We wish to see a greater emphasis on truly affordable housing in the new Local Plan as this is a key issue of sustainability in the creation of balanced communities.</p> | <p>the strategic growth options for the New Local Plan and making recommendations. More detailed mitigation will be considered at preferred options stage and beyond.</p> | |
| Culverden Residents' Association | SA 6 | We are unable to judge the suitability of the methodology but it appears to produce legitimate conclusions. | We do not believe that the kind of growth required by the assessments of housing need based on centralised assumptions can be provided in the Borough without unacceptable consequences for long term sustainability. If these assumptions cannot be seriously challenged and if the various legal constraints on unsustainable development cannot be successfully invoked, then there seem no further reasonable alternatives to consider. Of the alternatives, option 5 offers the best long term prospect of the least overall damage to existing settlements and to Royal Tunbridge Wells in particular. | <p>We think that the sustainability issues are very well documented in the Appraisal Report. They are also particularly problematic as <i>the evidence referred seems to indicate that any significant growth in the town of Royal Tunbridge Wells (and in general for the whole borough) would have a negative impact on many of the important indicators for well-being of the population.</i> These include</p> <ul style="list-style-type: none"> • air quality (which is rising to the top of the agenda nationally) • noise, particularly in the Important Areas for Road Noise (IARNs) • land use, landscape loss or degradation in the Green Belt/AONB • long term water and waste water security and resources • biodiversity • climate change and energy <p>These issues, which are very relevant to our specific area, are stated in the report to be incompatible with projected housing growth and the consequent need for physical and community infrastructure of all kinds to support it, unless there is substantial mitigation.</p> <p>Mitigation measures proposed to minimise this negative balance are either recognised to be uncertain or likely to be inadequate. In our area to date there has been no mitigation of the negative effects of growth in the population of St John's and Culverden wards of over 2,500 persons since the turn of the century. We are therefore very sceptical about the likelihood of success of adequate mitigation in the</p> | <p>Sustainability policies should robustly tackle existing air and noise pollution problems in RTW and ensure that any new development within the town or elsewhere in the borough does not add to it.</p> <p>There could also be greater emphasis on the transport implications of growth scenarios anywhere in the borough and the need for serious capital outlay in £M if we are to create safe and attractive green travel infrastructure <i>in advance</i> of any more growth. In our area danger, noise and pollution from rat-running has reached unacceptable levels and we will not support any further development which does not finance substantial investment and regulatory measures to tackle it visibly and effectively.</p> <p>A related problem to the one mentioned above is the wholly unsustainable way in which particularly primary education is organised in our area with local children often unable to attend local schools while children from outside are brought in by car adding to the serious traffic problems in the area. Pressure should be put on national government and KCC to organise schools location and entry procedures to reduce the present unsustainable provision.</p> | <p>Q1-2 – No response necessary. The scoring reflects how sustainable each of the growth strategies is thought to be.</p> <p>Success of mitigation proposals depends on many factors. Experiences of neighbouring authorities have been considered whilst preparing the recommendations. At this stage, the SA is testing the strategic growth options for the New Local Plan and making recommendations. More detailed mitigation will be considered at preferred options stage and beyond.</p> <p>Q4 - Existing air, noise and travel issues are considered in the scoring for each of these objectives. Congestion is considered indirectly via numerous objectives (air, biodiversity, carbon, travel).</p> <p>Supply of local school places is considered by the education objective.</p> | Q1 – 4 – No recommendations necessary |

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| | | | | future. | | | |
| Pembury Parish Council | SA 7 | Pembury Parish Council is unable to make a judgement on this because it doesn't have the figures – please provide: Moving in/out figures School/birth projections Number of rental properties/people in rental Demographics Pollution/air quality Healthcare use – including GP's patient numbers/availability | As Q1 | We are unhappy that the Pembury/Tunbridge Wells corridor is one of the preferred options. We request a meeting/public seminar so that the Borough can explain the thinking, methodology and research findings behind this recommendation – what is it based on? | | Q1 - 2 – All available data sources and the underlying evidence base are referenced and considered in the 2016 Scoping report http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0007/134485/2016_SA_Scoping_Report_Aug17.pdf Q3 – The growth corridor is currently not a preferred option. It ranks slightly higher than some other growth options in terms of overall sustainable development. However, there are still negative aspects and no decisions have been made yet regarding how this should be interpreted. | No recommendations or changes to report necessary at this stage. Comments forwarded to policy team. |
| Dr P Whitbourn | SA 8 | In response to question 1 and 3 of the Draft Sustainability Appraisal, I see the whole scoring system as highly suspect, and para 3.2.6 of that document seems to confirm this by discouraging readers from adding up negative or positive scores. | | | The subject of sustainability is touched upon under question 5. Paragraph 3.8 of the consultation document refers to the presumption in favour of "sustainable" development as a "golden thread" running through Local Plan making. To me, I see sustaining the exceptional natural and built environment of Tunbridge Wells as a "golden thread" that should run through the whole of the Local Plan process. In the Draft, Sustainability "Heritage" (presumably natural and built) is item 10 in a list of 19 Sustainability Objectives that are such as could be applied elsewhere, and appear to be treated with equal importance. While items such as air and water are, of course, essential human requirements that need to be universally sustainable, whether in Wolverhampton or the Lake District, sustaining the outstanding natural and built heritage is of special importance in Tunbridge Wells, in a way that does not necessarily apply elsewhere. Hence the need in para 4.49 of the consultation document that plans "should take local circumstances and opportunities into account". | Q1-3 – Noted. Response not possible without more detail on precise concerns Paragraph 3.2.6 has been included to ensure the SA process is not seen solely as a balancing exercise between the various objectives. Q4 – Noted. | Q1 – 4 - No recommendations for change are necessary. |
| Mr Terry Cload | SA 9 | I heartily endorse all of Dr P Whitbourn's comments, especially in respect of ' sustaining the exceptional natural and built environment of Tunbridge Wells as a "golden thread" '. That should be the paramount | | | There is a reference to noise pollution from roads and aircraft. Noise pollution from any source should be considered, e.g. from industrial processes, air conditioning fans from premises in | Q1 – noted. Q4 – Other sources of noise are not considered significant to the borough so | Q4 – Although not explicitly mentioned, light pollution will be considered in the SA framework for |

| Name/ Organisation | Comment Number | Question 1 - Do you have any comments regarding this method for scoring the various aspects of the new Local Plan against the sustainability objectives? | Question 2 - Do you think there are any further reasonable alternatives to the five proposed growth strategy options that should be considered by the Sustainability Appraisal? | Question 3 - Do you have any comments regarding the way the scoring has been interpreted and the conclusions and recommendations that have been made in Chapter 5? | Question 4 - Please provide any additional comments about this document | TWBC Response | TWBC Recommendation |
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| | | consideration running through the whole of the Local Plan process. | | | town centres, etc. There is no reference to rapidly increasing light pollution. Tunbridge Wells should aim to reduce light pollution that basically is wasted energy. The AONB especially should be protected from light pollution with the aim of it being a confirmed 'dark sky' area relatively free of interference from artificial light. There is a note about this in the Sustainability Scoping Report why is it not included in this document? There seems to be something wrong with the consultation process when only two ordinary citizens seem to have responded to the consultation by today (the closing date). Is it because residents feel that local councils and residents no longer have any real power to make decisions or is it down to a lack of meaningful publicity. Adverts in the local press are viewed by fewer and fewer people these days. Perhaps there should be more use made of social media, not just by an easy 'tweet' or Facebook post to the ether and to people already signed up to the consultation portal, but by building up and utilising a database of residents' direct social media contact details. | did not become a 'key issue' from which to create a sustainability objective. The scoping report considered the problem of light pollution and protection of dark skies but the scoring method does not make explicit reference to light pollution under the AONB sub objective of the Landscape objective. Comments re consultation process have been considered by appropriate council personnel. | Objective 13. Landscape as will affect landscape setting in the AONB and character and quality of the landscape. |
| Tunbridge Wells District Committee Campaign to Protect Rural England | SA 10 | We disagree with the method. The appraisal lists out 19 sustainability objectives (amongst which reducing light pollution doesn't seem to figure!) against which each of the 5 options (plus the do nothing option) are then scored and then broadly speaking the option with the highest score is considered the most favourable from a sustainability standpoint. The choice of the 19 sustainability objectives could easily affect the scores, by lumping certain aspects together (for example water and flooding) while separating out others (for example employment and business growth). We suspect that this downplays the importance of the environmental objectives compared with social and economic ones. We would argue that there are in reality only 3 strategic (Local Plan) objectives (environment, development and infrastructure) and that the remaining 5 Local Plan objectives are merely | Yes. Before recommending a strategy, site assessment needs to be married with options assessment ('bottom-up', meeting 'top-down'). This work should be completed in advance of preferred options proposals, and be available for consultation. CPRE would strongly object to this current assessment, which does not amount to an iterative process that allows options to be progressively narrowed and refined. Ideally, mitigation measures should only direct the choice of growth strategy if 'bottom up' assessment of sites confirms that the alternatives are reasonable, mitigation is possible, and they deliver the most sustainable suite of sites. Despite our reservations about the method used, we note that the | Please see our comments above. While we would fully support the recommendations in paragraph 5.1.2 we fundamentally disagree with the suggestion that these are sufficient to turn the various growth options positive. As we have said, the options are currently 'anywhere' potential strategies, with mitigation measures that have not been tested as viable, desirable, or even possible. Only once bottom-up sites assessment has taken place for each growth option (including a clear decision as to the location for the proposed new settlement and a SA for it) can a properly informed choice be made. We do, however, agree with the SA that the "do nothing" option must be rejected, for the reasons given. | Paragraph 1.3.1: The Scoping Report and the associated description of baseline and relevant plans, policies and documents should be updated every time a sustainability appraisal is completed as part of plan preparation. Evidence and data gathering should be an ongoing process. Relevant plans, policies and programmes should also be kept up to date and there is no evidence this work has been completed. Paragraph 1.3.5: Although the need for an interim report for consultation is not explicit in the SEA Regulations, the final report does need to make reference to how the results of consultations have been taken into account. | Q1 – Sustainability Appraisal was derived in accordance with the ODPM Guidance and the requirements of the SEA directive 2001. All required by the Directive environmental topics have been streamlined into the SA framework. The methodology does not intend to calculate the overall score across all SA objectives but rather looks holistically on the overall performance of each strategic Option, thus the decision about which of the Plan Options offers the greater amount of sustainability benefits is not based only on the highest score of the Plan option. Please refer to paragraph | Q1 – Although not explicitly mentioned, light pollution will be considered in the SA framework for Objective 13. Landscape as will affect landscape setting in the AONB and character and quality of the landscape. Q2 – other reasonable, realistic and deliverable alternatives will be considered in the subsequent stages of the Plan formulation and will be subject to the SA process. A new chapter on Post-Consultation changes will be included in the final version of the |

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| | | <p>subsidiary to those. Moreover, we cannot understand how some of the scores in the compatibility testing (Table 4) have been reached.</p> <p>The problem we have with this whole document is that it fails to consider adequately the trade-offs between the objectives. Referring back to the earlier Sustainability Scoping Report, this categorises the objectives into 'Social' (e.g. Housing, Deprivation, Equality...), 'Economic' (e.g. Growth, Employment, Services/Facilities...) and Environmental (Air, Land Use, Landscape, Noise...), and this earlier report correctly recognises that many of these are incompatible with each other.</p> <p>This then begs the difficult question as to what we actually mean as being the most "sustainable" option. We would argue that it is the one that yields the <i>highest</i> Economic / Social benefit for the <i>lowest</i> Environmental impact. There's a trade-off and we need to then decide where we want to place ourselves on this set of trade-offs. This is what the appraisal fails to consider when it simply scores each objective in isolation, and the appraisal does not, for each option, properly consider the incompatibility of the different objectives despite having raised this issue in the earlier scoping report.</p> <p>Sustainability performance of sites and policies needs to be considered in detail and not simplified to counting ticks, or green squares. Unfortunately the Council have done this at table 5 and 6. Although interesting, the results do not consider the reasons for poor scoring in detail. Furthermore, although improvements to objectives are proposed at paragraph 5.1.2, they do not resolve sustainability concerns identified (including those related to air, climate change, land use and resources).</p> <p>Biodiversity is scored consistently across the options, with a single (-). It would be more appropriate to score biodiversity as uncertain (?), since impacts will vary and not all impacts can be mitigated. The Ashdown Forest is a significant constraint that might have an impact on deliverability of development in the borough. Protected species and other habitats</p> | <p>Assessment states: "There is one Local Plan objective that is more incompatible than compatible with the Sustainability objectives. This is Objective 4 to deliver high quality housing that meets local needs".</p> <p>There is a further option, which is, having assessed the sites in a "bottom up" way, to conclude that the OAN housing requirement cannot be met within sustainability requirements and to proceed with a lower rate of growth, in accordance with paragraph 14 of the NPPF, at locations where the SA is positive.</p> <p>A further option (which may be combined with one of the other options) is to build and rebuild in future at much higher density than previously. We have commented on this in more detail in our response to the Issues and Options document.</p> | | | <p>3.2.6.</p> <p>There will be always tensions between environmental and economic SA objectives; therefore achievement of sustainable development is a balancing act.</p> <p>Detailed analysis of the strategic options is presented in chapter 5 of this report, identifying significant negative and positive effects for each of the options.</p> <p>As not all biodiversity impacts can be mitigated, a precautionary approach has been adopted for this score. See paragraph 5.2.3.</p> <p>Paragraph 5.2.9 needs updating to reflect range of scores for travel and access to services.</p> <p>Agree. The recommendations section can be updated to emphasis that preferred strategies are difficult to recommend without more detail on locations.</p> <p>Q2 – The site sifting and assessment work is being carried out in parallel with the Plan strategic options development to ensure iterative approach.Q3 – Noted.</p> <p>Q4 – The Scoping Report has been amended in light of the new evidence becoming available as the Plan develops, and responses from the consultees have been reflected in the final</p> | <p>Interim I & O SA Report to record the summary of iterations that it has undergone.</p> <p>Additional text added to the recommendations section to emphasize that preferred strategies are difficult to recommend without more detail on locations.</p> <p>Paragraph 5.2.9 updated to reflect range of scores for travel and access to services.</p> |

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| | | <p>may also have an uncertain impact on the delivery of growth options.</p> <p>It is with surprise that we see growth strategies 1 – 3 are described as having largely similar outcomes at paragraph 5.2.9. Travel and access to services are key indicators of sustainability and this should be recognised in the conclusion. Improvements to services, facilities and transport are challenging to deliver on smaller (and dispersed) sites. ‘Proximity’ should not be undervalued in sustainability terms.</p> <p>It is also surprising that the section titled ‘Recommendations for the new Plan’ recommends Growth Strategy 5 as the preferred option. It is absolutely inappropriate to recommend a strategy in isolation from sites assessment. The options are currently ‘anywhere’ potential strategies, with mitigation measures that have not been tested as viable, desirable, or even possible. They have not been suggested with site constraints in mind.</p> | | | | version of the Scoping Report. | |
| Lamberhurst Parish Council | SA 11 | <p>The methodology is not very clear for the layman and there is no explanation of why the decision has been made based on the criteria. Also Parking is not one of the criteria and as the local plan is still focussed on cars being the major form of transport in the Borough it should be part of the criteria mechanism</p> | <p>The options are not unreasonable but once again do not take into the real constraints so they are based on theory and not real practise.</p> <p>Option 5 can only be realised if a suitable piece of land can be acquired which will not have major impact on the landscape characteristic within the AONB</p> <p>Option 4 is an old fashioned view that once you have a new road build along it which causes further congestion and less definition of rural and urban areas</p> <p>Another option of a mixture of development sites following a proper analysis of the boroughs potential sites as well as cross border cooperation as the Borough may not be able to deliver the housing targets within its boundaries with 70% being within the AONB.</p> | <p>It is reasonable to offer the options but the conclusions do not seem to be very realistic as they depend on whether land can be acquired for a garden village option 5 and to then include building along the A21 corridor focussing on those villages involved seems unrealistic and lazy form of analysis.</p> | | <p>Q1 – Appendix B provides an example of how decisions were made.</p> <p>Parking provision is not a directly critical issue in terms of sustainable development. However, the scoring method allocates positive scores for aspects that help create a reduction in private car use.</p> <p>Q2 – Following comments from Natural England, Paragraph 5.2.4 now makes reference to the landscape impact of not finding a suitable location for Growth Strategy 5 outside of the AONB.</p> <p>The SA was assessing both the reasonable and unreasonable options presented by the policy</p> | <p>Q1 – 3 – No recommendations for change are necessary.</p> |

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| | | | | | | <p>team.</p> <p>Mixed growth strategies have been considered by paragraph 5.2.8. If a mixed growth strategy option becomes preferable, the SA will formally assess all reasonable mixed growth strategy alternatives, alongside the option of cross boundary cooperation.</p> <p>Q3 – Limitations to growth strategies 4 and 5 are acknowledged. However, the borough council is still presenting them as options for growth so they must undergo the SA process.</p> | |
| Brenchley Parish Council | SA 12 | <p>1. Rating each Strategic Objective against the Sustainability Objectives through a +/- system seems reasonable and an attempt is made to define the meaning of the ratings. Nevertheless, the approach may give more of an appearance of objectivity than is warranted.</p> <p>2. The basis for and application of weighting are not well explained and there are some surprising zero weights, such as: make allowances in housing targets due to environmental constraints; protect the Green Belt; protect and enhance landscape and townscape character and quality; and support superfast broadband connectivity.</p> <p>We note also that the methodology pays little attention to problems of water supply in an area already under stress.</p> | <p>1. We would not suggest other alternatives for the given target for housing development, but continue to question the validity and feasibility of the target itself.</p> | <p>1. The basis for the judgements made using the methodology is often unclear, understandably so given the number of sustainability indicators.</p> <p>2. The overall conclusions and recommendations may need to take more explicit account of feasible timing within the period up to 2033.</p> | | <p>Q1 – The scoring method is intended to be an impartial assessment of how well policy meets sustainable development objectives.</p> <p>Higher weightings were given to issues that were legislatively driven for example.</p> <p>Water consumption rates are considered in the first decision-making criteria of the water objective. Consideration will be given to whether this objective would be better placed within the resources objective instead of the water objective. This would give the issue greater influence in the final scores.</p> <p>Q2 – Noted. The target is not under question by the Sustainability Appraisal.</p> <p>Q3 – The large number of</p> | <p>Q1 - Clarification over use of weightings added to paragraph 3.2.3.</p> <p>A guide question on 'reduction of water consumption rates' will be placed under resources SA objective in the subsequent SA reports.</p> <p>Q2 – No recommended response necessary.</p> <p>Q3 Detailed SA assessments scoring sheets for each of the strategic options will be attached as Appendix B to the Interim I & O SA Report and will be available on line.</p> <p>Clarifying text over phasing and short/medium term growth added to</p> |

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| | | | | | | indicators chosen reflects the complexity of the sustainable development agenda. Note paragraph 4.2.4. A better understanding of the scoring could be obtained by studying the scoring tables for all growth strategies instead of just Growth Strategy 1. | paragraph 5.3.1. |
| Gladman Developments | SA 13 | | | | <p>1.1 Sustainability Appraisal</p> <p>1.1.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).</p> <p>The SA/SEA is a systematic process that should be undertaken at each stage of the Plans preparation, assessing the effects of the emerging SLP proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision making and scoring should be robust, justified and transparent.</p> | Q4 – Comments notes. The SA methods will be used again once the council begins to consider preferred options. | Q4 – No recommendations for change are necessary |
| High Weald AONB Unit | SA 14 | | Option 3 could have a variant where some small scale development is permitted at farmsteads and hamlets to reflect the dispersed settlement pattern of the area. | <p>Whilst the issues and objectives in the report are as to be expected, when these are developed into sustainability criteria and then these criteria are applied to options in the draft Sustainability Appraisal, they are interpreted in a way that only gives a very partial picture of sustainability.</p> <p>The 'Summary and Recommendations' for each option do not give a clear justification for the scoring against each criteria but just pick out some issues and potential mitigation. It is not clear why (as stated in the Non-Technical Summary) Option 5 scores the most favourably and Option 4 apparently is the second most sustainable option. The scoring assessment in Appendix</p> | | <p>Q2 Noted.</p> <p>Q3. The SA assessment framework has been developed and consulted upon with statutory consultees and beyond. Each of the options has been tested against the criteria derived to tease out the potential significant effects against each of the criteria and then to draw conclusions about the overall</p> | <p>Q2 Other reasonable, realistic and deliverable alternatives will be considered in the subsequent stages of the Plan formulation and will be subject to the SA process.</p> <p>Q3 Assessment sheets with the SA scoring for all of the strategic options will be included in Appendix B to this SA</p> |

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| | | | | <p>B just provides the matters that have been considered generally, it does not say how they have been applied to each option. The comment under some (but not all) of these summaries that “full scoring assessment available upon request’ is not acceptable. The consultation should be on the entire Appraisal not just parts of it. The full scoring assessment is crucial to understanding why some options are considered more sustainable than others.</p> <p>With respect to Option 5, assessing this hypothetically with no proposed location makes most of the criteria indeterminate and the positives assume that such a settlement would provide employment and other services when this is not guaranteed, especially if it is a ‘garden village’ (normally under 5,000 units) rather than a larger settlement. Most of the summary consists of recommendations for mitigation rather than justifying the scoring. If this is considered a realistic option then further work should be undertaken to identify a location so that it can be assessed properly against the sustainability criteria.</p> <p>With respect to Option 4, again it assumes employment and service delivery without explaining why this would necessarily happen with this option. Impact on air quality only appears to be considered in terms of whether it would reduce pressure on roads through Tunbridge Wells, which advantages options that would locate development away from Tunbridge Wells town in places where there are no facilities or sense of community, and where development would lead to the coalescence of existing settlements (i.e. along the A21). Whilst Appendix B states that, under the Landscape criteria, options will be assessed partly on whether they protect and enhance the AONB, no mention is made in the summary of Option 4 of the fact that the majority of the area identified along the A21 is in the AONB.</p> <p>Similarly Options 1, 2 and 3 all have implications for the AONB but this is not mentioned in the summaries. No assessment seems to have been made of the options in terms of whether they would reduce car dependency, create sustainable communities, enhance health and well-being of residents or respect the character and settlement pattern of the Borough, all important considerations in assessing the sustainability of options.</p> <p>These shortcomings devalue any conclusions drawn from this Appraisal.</p> | | <p>sustainability of each of the options.</p> <p>SA is a tool for predicting likely significant effects. Prediction of effects is made using an evidence based approach and incorporates professional judgement.</p> <p>Whilst the Plan Options will continue to evolve, appraisals are based on the information available at the time of assessment and every effort has been made to predict effects as accurately as possible using the available information.</p> <p>The Plan Options present high level alternative approaches for potential development distributions for the whole borough. SA is a strategic assessment in nature and has been applied proportionately with the necessary level of detail at this stage of plan preparation.</p> <p>The Plan Options were assessed against the SA Objectives to enable the identification of key strengths and weaknesses, and any potential areas for improvement. Mitigation measures and recommendations were suggested to offset or alleviate any predicted adverse impacts, or to enhance any opportunities.</p> <p>The assessment of the Plan Options has been undertaken using a matrix-based approach. The decision making criteria, together with their definition (i.e. how a positive score was</p> | <p>report and be available on line.</p> <p>The subsequent SA reports will include a more detailed justification of the scoring and how it translates into the sustainability performance of each of the options across all aspects of sustainable development, i.e. social, environmental and economic. The subsequent SA reports will also focus more on providing a holistic overview of how each of the options promotes sustainable development; identify positive and negative significant effects in the context of the current key issues identified for the borough and the overall effect of the Plan. A clear explanation of why one of the options provides greater sustainability benefits comparatively to other options on the balance of all issues considered will be also provided. A clearer explanation of assumptions and limitations will also be provided once more information through evidence base studies become available.</p> |

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| | | | | | | assigned) are presented in Appendix B. | |
| Cranbrook & Sissinghurst Parish Council | SA 15 | <p>To compare TWBC's strategic objectives to sustainability objectives is a false comparison. In some cases, they are direct opposition to one another.</p> <p>We would like greater clarity on the weighting given to the sustainability objectives.</p> | <p>Review the Objectively Assessed Need for housing based on community-led data gathered at parish level, and not driven by top-down targets.</p> <p>Reassess opportunities for redevelopment within built environment.</p> <p>Consider growth through more dispersed development of hamlets and farmsteads.</p> | There are too many unknowns, marked with question marks throughout. Any meaningful decision cannot be made without more detail on the constraints. | <p>No indication has been given as to who is to answer the many questions raised, from waste water to biodiversity etc.</p> <p>There is a huge question mark over resources.</p> <p>5.2.6 contradicts 5.2.3</p> <p>5.3.1. Appears you have already made a decision to adopt Option 5, before all the evidence has been gathered.</p> | <p>Q1 – All policy must be subjected to Sustainability Appraisal. Recommendations have been made in paragraph 5.1.2 for how TWBC's strategic objectives could become more sustainable.</p> <p>Following similar comments from Brenchley Parish Council, it was agreed that further explanation on weightings is required.</p> <p>Q2 – The Housing Needs Survey at local level is currently underway and the SA process will be updated (if necessary) when the results are obtained.</p> <p>Growth within the built environment is a key consideration for growth strategies 1 – 3. When available, the brownfield register will guide this process and the SA will be updated (if necessary). In the mean time, development on brownfield land is scored more positively compared to that on greenfield.</p> <p>Dispersed growth is a key component of Growth Strategy 3.</p> <p>Q3 – The strategic nature of the options means that many location specific sustainability issues and aspects relating to development management such as resources could not be scored. These aspects will be much clearer at preferred</p> | <p>Q1 - Clarification over use of weightings added to paragraph 3.2.3</p> <p>Q2. Other reasonable, realistic and deliverable alternatives will be considered in the subsequent stages of the Plan formulation and will be subject to the SA process.</p> |

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| | | | | | | <p>options stage when potential development sites are under consideration.</p> <p>Q4 – Recommendations made have been passed internally to policy team and answers will be sought before preferred options are determined.</p> <p>See response to Q3 above for information on resources.</p> <p>Para 5.2.3 explains general observations across the scores for the strategies. Whereas, para 5.2.6 provides an alternative view of the scores should mitigation of adverse effects and maximisation of beneficial effects be possible. We are not aware of contradictions. Growth Strategy 5 currently not a preferred option. It ranks slightly higher than some other growth options in terms of overall sustainable development. However, there are still negative aspects and no decisions have been made yet regarding how this should be interpreted.</p> | |
| Natural England | Received after consultation ended | <p>Para 4.2.3 – includes an assumption made before scoring that there would be 'no net loss of existing greenspace'. It is not clear what is meant here by existing greenspace, ie if this refers to existing public recreational/ accessible open areas, or if it also includes existing countryside and habitats which may not be accessible to the public. In particular for the radical options for a new garden village or the A21 corridor, it is hard to conceive how such an assumption can be made, and of particular concern would be landtake within the AONB which is of special interest in terms of distinctive landform and character. As such, we would recommend clarifying the definition of</p> | <p>I refer back to my original comments on the Local Plan Issues and Options in that, assuming the garden village cannot avoid being located within the AONB, options 1-3 may be simpler to manage in terms of landscape impacts if planned well.</p> | <p>I note the garden village option has emerged as the most favourable option after scoring. This is despite it being unclear where the village would be sited, in particular outside or inside the AONB, although I note the intention for the AONB to be unaffected. However, given the extent by which the Borough is occupied by the AONB, there remains the real possibility of this option having to be located within or partly within the AONB. Should this transpire, and particularly if combined with the A21 corridor option, this will have substantial adverse impacts on the AONB. This risk should be fully recognised in the SA, along with likely changes in scoring on sustainability depending on its location within or outwith this protected landscape.</p> <p>Similarly for the A21 corridor option which has</p> | No further comments | <p>Q1 – Existing green space was meant in the context of publically accessible space that could promote physical activity and improve the health agenda.</p> <p>Appendix A details the biodiversity guide questions /indicators that are now being used to score the Local Plan. These were expanded following Natural England comments on the Scoping Report in 2016. Number of developments generating</p> | <p>Q1 – clarifying text added to paragraph 4.2.3.</p> <p>Q2 – No recommendation or response necessary.</p> <p>Q3 – Detailed assessment sheets with the SA scoring for each of the Plan Options will be included in Appendix B to this SA report and be available on line.</p> |

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| | | <p>'greenspace' here.</p> <p>In terms of indicators, I refer back to Natural England's response to the Stage A SA Scoping report, as submitted on 01 August 2016, where we advised additional meaningful indicators should be included for assessing the Local Plan policies against the Biodiversity objective. These should include number of developments generating adverse effects on sites recognised for biodiversity value (including local sites as well as Sites of Special Scientific Interest (SSSIs)); developments generating biodiversity enhancement; and strengthening of green infrastructure in terms of hectarage/ length of greenspace and corridors.</p> <p>We also note under the Health objective, an indicator relating to accessible greenspace; this should be made more specific e.g. percentage of population with accessible greenspace within 400m of their homes, and hectarage of greenspace available per 1000 population.</p> | | <p>emerged as second most favourable, landscape impacts on the AONB are likely to be substantial. In terms of effects on biodiversity, given the likely losses of biodiversity resulting from this option as acknowledged in the SA report, which may particularly affect ancient woodland which occupies much of this proposed area even if direct loss is limited, we consider this would be better reflected in the scoring by changing the effect of this option on the biodiversity objective from neutral to negative.</p> | | <p>adverse vs enhancements cannot be assessed at this stage as this SA assessed only strategic growth options. However, the scoring system for individual sites does include a spectrum of impact from full loss to full protection and improvement of site of biodiversity value. Note: GI is considered under the landscape objective. Exact quantities of area and length can be recorded at site assessment stage.</p> <p>The 5 ANG Standards will be assessed and recorded for each potential development site when the SA for these sites begins. At this stage of assessing strategies only, it was not possible to provide specific data.</p> <p>Data on the % of households within 300m of a 2ha space etc. are included in the evidence base for the Scoping Report (see Wellbeing indicator page45) http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0007/134485/2016_SA_Scoping_Report_Aug17.pdf</p> <p>Q2 – No response necessary.</p> <p>Q3 – The example scoring table shown in Appendix B was for Growth Option 1 (see para 4.2.4). Scoring tables for Growth Options 4 and 5 are available upon request and already reflect the scores that Natural England has recommended. Also see Tables 7 and 8. Biodiversity and Landscape objectives are already scores negative for Growth Strategy</p> | <p>Clarifying text added to mitigation notes for Growth Strategy 5 on page 30 about potential impact upon the AONB should the recommendation for avoiding a location within the AONB be impossible to follow.</p> <p>Q4 – No recommendation or response necessary.</p> |

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| | | | | | | 4. Risks to the AONB from the garden village option have been based on assumption that the AONB would remain unaffected. | |
| Environ ment Agency | Receiv ed after consul tation ended | | | | I have had a look through the draft SA and I can't say we have a lot to say at this stage. I note the approach taken and it seems reasonable. | Q1-4 – No response necessary. | Q1 – 4 – No recommendation necessary. |
| Historic Englan d | Receiv ed after consul tation ended | | | | I have had a very quick read of the Interim SA and I can find no areas of concern for us; I think it is a very well prepared and balanced assessment in terms of its coverage of the historic environment. On that basis Historic England has no specific comments to make at this stage. I would suggest (although I am sure you have done so already) that you involve the Council's in-house conservation staff in the assessment process as they are best placed to advise on the potential impacts of development options on local heritage assets. Let me know if you need any more detailed input from HE at this stage. | Q1-4 – No response necessary. | Q1 – 4 – No recommendation necessary. |