



Sustainability Analysis

Goudhurst Neighbourhood Plan

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Cover – Photographs submitted for the NDP photography competition,
<https://goudhurst-pc.gov.uk/photographic-competition/>

Section 1 Introduction

Principles of sustainable development are considered throughout the plan

Our Plan positively supports the needs of our Parish

This document forms the Sustainability Appraisal (SA) of the Consultation Draft Goudhurst Neighbourhood Plan (GNP) to be submitted under regulation 15. The purpose of SA is to ensure that the principles of sustainable development are considered throughout the plan making process and that the final Goudhurst Neighbourhood Plan has considered all aspects of economic, social and environmental sustainability in its production.

The Scoping Report¹, created in 2017, was produced to allow consultation and discussion around the key sustainability issues facing Goudhurst Parish and to provide a framework for assessing the likely significant effects of the Goudhurst Neighbourhood Plan.

This document uses the scoping document providing an analysis of the Goudhurst Neighbourhood Plan against the findings and objectives of that report.

The scoping document reflected:

- Our neighbourhood including residents needs and concerns
- The overall make-up and character of the Parish and residents' issues and problems
- Plan objectives and goals
- The alternatives and options identified in public consultation and workshops

The report was structured around the three themes of sustainable development:



The Economic theme describes business and economic development in the Parish and how the Neighbourhood Plan can support economic growth and jobs. Our economy is important to our community and business growth, education, employment, services and facilities, travel and traffic were determined to be key issues.

The impact of change on our Parish, for example on our services or residents, is described under the Social theme. The focus was centred on local needs and issues and areas such as deprivation, education, equality, health, housing and transport were determined to be key issues.

Our Parish has a number of unique features, habitats, and environments that need to be conserved and enhanced including air quality, biodiversity, climate

¹ Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC which was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or Strategic Environmental Assessment (SEA) Regulations

Plan developed from the options and alternatives

change, energy, heritage, land use, landscape, resources, waste and water. These were assessed under the Environmental theme.

From the options and alternatives assessed and, following consultation, a set of policies and projects were included in a draft of the Neighbourhood Plan, which was published for Regulation 14 consultation in December 2018.

Feedback was taken and an updated plan produced. This updated plan and the policies within it have been assessed against the scoping document resulting in this document.

1.1 Parish Context

Goudhurst is in west Kent and borders East Sussex

Goudhurst Parish comprises Goudhurst village, Kilndown and Curtisden Green. The Parish is in West Kent and forms a part of the Borough of Tunbridge Wells. It lies to the east of Tunbridge Wells town and has boundaries with the Parishes of Horsmonden, Cranbrook & Sissinghurst, Hawkhurst, and Lamberhurst

To the south there is a boundary with Ticehurst in East Sussex and Marden and Staplehurst (both in Maidstone Borough) to the north.

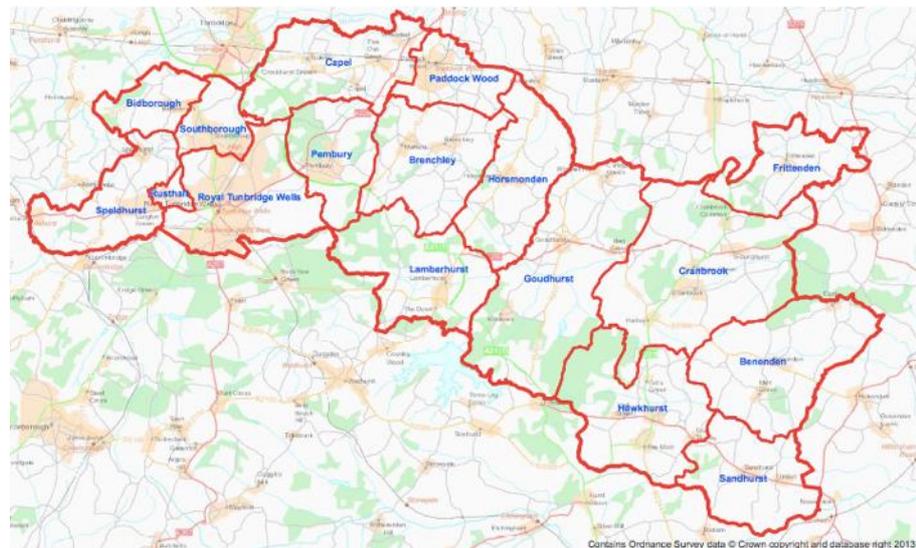


Figure 1 Parishes in Tunbridge Wells

The proposed Neighbourhood Area follows the boundary of the Parish of Goudhurst.

Our plan must conform with national and borough policies

1.2 Policy Context

The Goudhurst Neighbourhood Plan must conform with higher level policy. This means that it must conform with national, regional, and local policy including TWBC Core Strategy and Local Plan 2006. A new TWBC local plan is in development and is at Regulation 18.

The Parish of Goudhurst

This Plan applies to the Parish of Goudhurst in Kent. Goudhurst Parish covers 25 sq. Km (9.6 sq. miles). It has a rich heritage and the natural environment has changed little over centuries. 80% of the Parish falls within the High Weald Area of Outstanding Natural Beauty (AONB), 27% is ancient woodland and 19% of our buildings are listed.

Goudhurst Parish has three hilltop settlements with Goudhurst being the largest. Goudhurst contains 53% of the population with Kilndown (11%), Curtisden Green (9%) and the remainder (27%) being in the surrounding countryside.

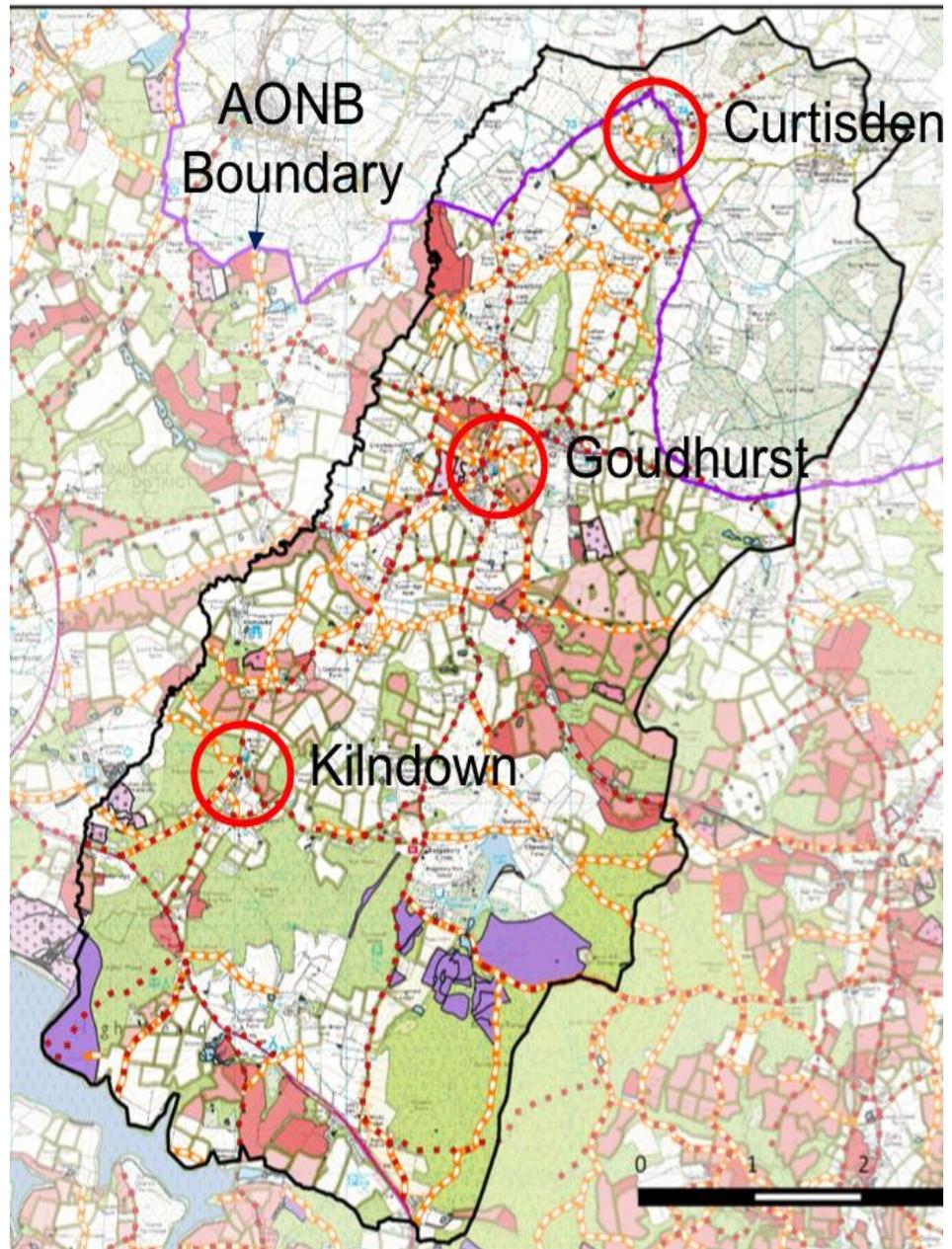


Figure 2 The Parish of Goudhurst

Section 2 Sustainability Analysis - Stages

There are five stages in the SA process, but these are not directly related to the Neighbourhood Plan development stages. The relationship is detailed below, and this document is the deliverable at **SA stage C**.

NP stages 1 and 2:

1. Laying the Foundations
2. From Capacity to Action

Stage A: Setting context and objectives, establishing the baseline and deciding on the scope

A1 Identifying other relevant policies, plans and programmes, and sustainable development objectives

A2 Collecting baseline information

A3 Identifying sustainability issues and problems

A4 Developing the SA framework

A5 Consulting on the scope of the SA (the 'Scoping Report')

NP stage 3:

Producing the draft Goudhurst NP

Stage B: Developing and refining options and assessing effects

B1 Testing the NP objectives against the SA framework

B2 Developing the NP options

B3 predicting the effects of the draft NP

B4 evaluating the effects of the draft NP

B5 considering ways of mitigating adverse effects and maximising beneficial effects

B6 Proposing measures to monitor the significant effects of implementing the NP.

Stage C: Preparing the SA report

C1 Preparing the SA report (**this report**)

NP stage 4:

Refining the Neighbourhood Plan

Stage D: Consulting on the draft NP and Sustainability Appraisal report

D1 Public participation on the SA report and the draft NP

D2 Assessing significant changes

NP stage 5:

Adopting the Goudhurst Neighbourhood Plan

ADOPTION OF NP

D3 Making decisions and providing information

Stage E: Monitoring the significant effects of implementing the NP

E1 Finalising aims and methods for monitoring

E2 responding to adverse effects

2.1 Selecting Sites for Development

This plan will defer site allocation to TWBC

The GNP has been developed in parallel with the new Tunbridge Wells Local Plan. In support of their process TWBC issued two Calls for Sites (in 2016 and 2017) that brought forward 26² sites across our Parish.

The Parish Council considered a process of site selection and ultimately decided to defer allocations to the Borough Council. As sites are not allocated within the GNP this simplifies the overall SA process.

Section 3 Our Vision, Goals and Objectives

Our Vision:

‘Our Parish in 2033 will be a vibrant neighbourhood, containing hilltop settlements that are safe, balanced communities, with sustainable housing standards, good local services, business opportunities, managed traffic and walkable roads – a neighbourhood that supports change and development yet remains quiet and unspoilt’

Over the last two years, we have worked to capture issues and concerns raised by residents and to identify the features and characteristics in the landscape we value and wish to preserve. This information, along with the results from our questionnaire, was used in a series of public workshops that set an overall vision and developed a broad set of goals and objectives. These goals and objectives have guided the development of our plan.

Our Vision

Our first workshop delivered a vision for our Parish to guide activities over the plan period (until 2033). The vision (left) highlights the key qualities of our Parish as well as identifying the concerns and aspirations of our community:

- the landscape in which our settlements are located
- the need for balanced and safe communities
- the need for sustainable housing and local services
- the need to improve traffic flow and road safety
- the support for development
- the need to conserve the essence of the High Weald AONB

Areas of Focus

Our plan takes a positive approach to managing future development in our Parish. The five working groups identified six policy areas which best reflect the views, opinions, aspirations and concerns we have captured.



Figure 3 Six policy areas were identified

In the workshops, we assessed the evidence base and identified a number of development options. The impact of each option was assessed, highlighting the

² As at October 2018

strengths, weaknesses, opportunities and threats using small, medium and large development scenarios.

Objectives were identified in each policy area and these are detailed below. Each policy will identify a relevant objective, the overall intent of that policy and the evidence that supports it.

Representing the Views of our Community

The community has supported the creation of this Neighbourhood Plan at all stages. Our public meetings attracted large audiences and the questionnaire was completed by nearly half of our eligible residents. This support, and the base of evidence, enabled us to establish a consensus against which we judged the policies and proposals included in our plan.

The policies in our plan were developed against the following objectives:

Goals of our Plan	Objectives that deliver our Goals
<p>Landscape and Environment</p> <p><i>Our Parish occupies one of the most dramatic areas in the High Weald AONB with all three of our settlements prominent on the skyline. Protecting our landscape for future generations is important to our community</i></p>	<ul style="list-style-type: none"> - Retaining our distinct hilltop profiles - Protecting our heritage and its setting - Protecting our views in and out of our settlements - Protecting and enhancing biodiversity and the natural environment - Conserving Ancient Woodland - Conserving Water Resources - Protecting our Dark Skies
<p>Community and Wellbeing</p> <p><i>Our residents have a strong sense of community and we are focused on meeting their needs and aspirations in both planning policy and community projects</i></p>	<ul style="list-style-type: none"> - Improving and developing community facilities and services - Improving our communications infrastructure e.g. broadband - Preventing the loss of retail and commercial space to housing - Retaining community assets for future generations - Providing access for all sections of society to facilities and services - Improving dissemination of Parish news and information - Building pride in our community
<p>Housing</p> <p><i>Improve the sustainability of Goudhurst Parish as a demographically mixed and balanced community delivering new homes that meet the needs of our residents</i></p>	<ul style="list-style-type: none"> - Improving the balance in our housing stock by encouraging smaller homes thereby allowing residents to remain in the community - Delivering <ul style="list-style-type: none"> o more affordable housing for rent or shared ownership tied to local need o market housing suitable for downsizing and smaller households o housing to support an ageing population - Allocating affordable housing to those with a strong local connection both now and in the future
<p>Business and Employment</p> <p><i>Support business development and the creation of new employment opportunities within the community</i></p>	<ul style="list-style-type: none"> - Improving the strength of the local economy - Supporting local businesses and local employment - Supporting increased tourism - Protecting retail and commercial premises from change of use - Supporting live-work initiatives - Creating diverse employment opportunities for residents - Improving short term parking

Our Vision, Goals and Objectives

<p>Design</p> <p><i>Deliver homes that have safe access to amenities, are environmentally sympathetic, energy efficient, flexibly designed and use materials that age well</i></p>	<ul style="list-style-type: none"> - Enhancing our community by the quality of individual design and the overall spatial design and fit with existing development - Maintaining the character of our landscape - Improving access and inclusion - Ensuring efficient use of resources and available land - Developing housing of a scale and character appropriate to our Parish
<p>Traffic and Transport</p> <p><i>This is the most important issue in our community. We will initiate and support actions to manage traffic flows, improve parking, implement traffic calming and develop flexible community transport</i></p>	<ul style="list-style-type: none"> - Ensuring traffic considerations are included in all development proposals - Initiating projects to address key issues not covered by land-use policies - Reducing the level of congestion in Goudhurst village - Improving road safety across the community - Facilitating safe walking, cycling and riding - Removing unnecessary Heavy Goods Vehicle journeys through our village

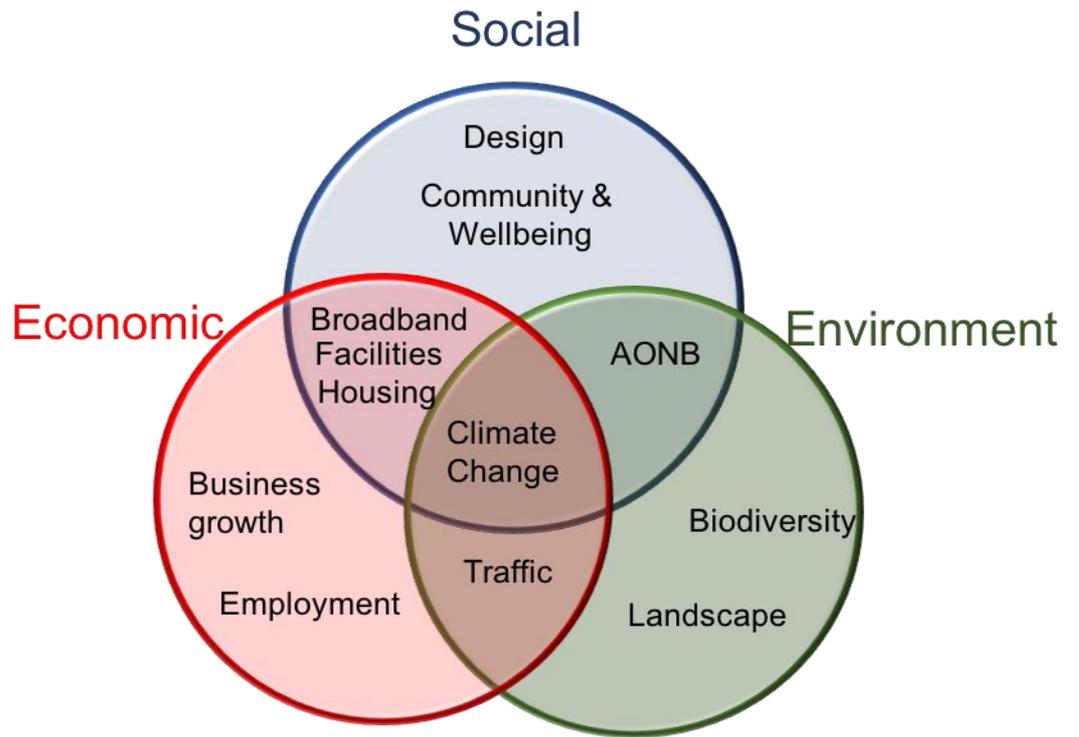
Section 4 Our Policies

This is a summary of the policies detailed in Goudhurst Neighbourhood Plan. Each policy is summarised and the overall intent of the policy is outlined.

Policy Area	Policy	Policy Intent
Landscape and Environment	L1 Development within the AONB	To ensure that any development complements the AONB and improves the rural environment
	L2 Development outside of the AONB	To place constraints on development in areas of the Parish that adjoin the AONB
	L3 Retain the Profile of our Hilltop Villages	To limit development on the slopes of our settlements and in prominent positions and to maintain a distinct green gap between our settlements
	L4 Conserve Landscape and Heritage Assets	To protect, for future generations, the area of rich landscape and heritage in which we live
	L5 Gap between Goudhurst LBDs	To protect the gap between the two Goudhurst Limits-to-Built-Development (LBD) from coalescence or erosion
	L6 Biodiversity	To ensure new development provides a net gain in biodiversity and does not adversely impact the natural environment
	L7 Trees	To protect the important trees and ancient woodland in the Parish
	L8 Protect dark skies and Light pollution and 'nightscape'	To remain a dark skies community and continue to minimise the impact of light pollution whether from public or private sources
	L9 Local Green Spaces	To identify Green Spaces in our community that will be protected from future development
	L10 Views	To protect the important views that are the essence of what it means to live in the Parish and which are so valued by residents and visitors.
Community & Wellbeing	C1 Community Facilities	To support improvements in facilities and amenities
	C2 Accessibility	To ensure new development is accessible to all
	C3 Developer Contribution	To explore options for developer contributions to enhance community life
	C4 Assets of Value within the Community	To protect significant assets in the Parish from change or loss
	C5 Broadband and Mobile Infrastructure	To support the provision of improved service within the Parish
	C6 Protecting & improving Public Rights of Way	To protect and, where possible, enhance the existing public rights of way network and its setting.
Housing	H1 Housing Mix	To require mixed development with an emphasis on smaller homes to meet local need
	H2 Tenure Mix	To ensure developments include a mix of tenures

	H3 Allocating Affordable Housing	To ensure local people have priority when allocating affordable housing
	H4 Rural Exception sites	To actively seek rural exception sites
	H5 Replacing or Combining Dwellings	To provide guidance and to control the size and scope of replacement dwellings
	H6 Conversion of Existing Buildings	To provide more commercial or residential properties using redundant buildings
Business	B1 New Business Space	To encourage the development of businesses and employment, making Goudhurst a good place to invest
	B2 Retention of Business Premises	To retain shops and businesses in our community
	B3 Adaption for Live-Work	To provide guidance around developments intended for live-work use
Design	D1 Design Considerations	To provide guidance on our expectations of good design in our community
	D2 Boundary Treatments	To set expectations on how boundaries in new development should be treated
	D3 Climate Change	To require new homes to be more efficient and future-proofed, e.g. with regard to drainage and the collection and re-use of water
	D4 Inside the Conservation Areas	To provide guidance on development within the conservation areas
	D5 Outside the Conservation Areas	To provide guidance on development outside the conservation areas
	D6 Extensions	To provide guidance around size and scale of developments
Traffic	T1 Parking in New Development	To ensure one parking space for every bedroom in new developments inside the conservation area to reduce the impact of parking on the roads within the centre of Goudhurst
	T2 Safe Access and Sustainable Transport	To ensure that new developments do not inhibit free-flow of traffic or increase parking on local roads; and to seek mitigation where needed
	T3 Traffic Mitigation	To ensure that where possible new developments provide safe pedestrian access to bus stops, schools and other village facilities.
Projects	P1 Access to Affordable Housing	To meet the need for affordable housing in our community.
	P2 Traffic, Parking and Road Safety	To identify and address our traffic issues
	P3 Improving Parish Facilities	To identify areas for improvement of Parish facilities
	P4 Improving Parish Communication	To set out a plan to improve Parish communication
	P5 Making Use of Developer Contribution	To set out a plan for the use of developer contributions

In terms of the overall SA process our polices are distributed across the three sustainable themes:



Section 5 Scoping Report - Key Findings

The effect of policies within our plan, and the impact of development within our Parish, have been assessed using the framework set out in our Sustainability Analysis scoping document³.

Options and alternatives were identified, reviewed and discussed with the community in workshops and public meetings. A set of policies has been developed which is intended to meet the needs and aspirations of our residents for the future of their community.

The SA scoping report set out a series of key findings which highlighted issues that could have an impact on the Neighbourhood plan. These are listed below with an assessment of how the plan team believe the Goudhurst Neighbourhood plan addresses the identified impact areas.

Performance is measured as:

Strongly Agree	The impacts have been fully understood and addressed
Agree	The impacts have been fully understood and addressed
Neutral	The impacts have been fully understood and addressed
Disagree	The impacts have not been addressed
Strongly Disagree	The impacts have been understood or addressed

Table 1. A summary of our analysis.

Key finding	Impact upon the Neighbourhood Plan	Plan performance
Air quality is a concern and needs to be improved	<p>Although there are no Air Quality Management Areas (AQMAs) in the Parish (the nearest is approximately 20 km to the north-west) we should consider our dependence on fossil fuels for heating</p> <p>There are concerns over further increases in traffic congestion as a result of further developments within and to the east of the Parish</p>	<p>Neutral:</p> <p>The plan addresses the concerns for new development deprecating the use of fossil fuels. but development outside the Parish could negate our efforts.</p>
Biodiversity requires conservation and enhancement	<p>Promote biodiversity conservation and enhancement. The majority of the Parish (90%) is in the AONB with 30% ancient woodland. There are two SSSI's located within the Parish, and one RIGS (Regionally Important Geological and Geomorphological Sites) site in the area is the</p>	<p>Strongly Agree:</p> <p>The plan requires an improvement in biodiversity in all development and conserves both the landscape features and ancient woodland.</p>

³ Where is the scoping report

Key finding	Impact upon the Neighbourhood Plan	Plan performance
	outcrop of Tunbridge Wells Sandstone in Scotney Castle Grounds	
Climate change is a serious problem with far reaching consequences	Ensure that any changes proposed in the Neighbourhood Plan are adapted to meet the results of climate change	<p>Agree:</p> <p>Our plan requires new development to be more efficient and future proofed and promotes live-work developments to reduce travel. Design policies positively support improvements in climate change.</p> <p>Development can have a negative impact on climate change and energy usage for example business growth, housing, traffic and transport.</p>
Cultural heritage and archaeology require protection and enhancement	Goudhurst has a rich cultural heritage and archaeology with around 20% of all buildings in the Parish being listed and with 18 listed as Grade I or II*. There are also two conservation areas. Our heritage is very important to our community.	<p>Strongly Agree:</p> <p>Our plan protects our heritage assets and re-enforces protections for conservation areas and landscape features</p>
Energy reduction and low and zero carbon energy sources are needed	Need to ensure future development reduces energy and promotes low and zero carbon energy sources	<p>Neutral:</p> <p>The plan proposes the use of low carbon and renewable energy for new development</p>
Flood prevention is necessary in the Parish	Although there are limited number of areas at risk of flooding, we need to manage flood prevention.	<p>Neutral:</p> <p>The elevated position of our Parish and the distribution of settlements means that we are at less risk of flooding and so the plan will rely on provision in the NPPF and the TWBC local plan</p>
Housing demand is high	There is demand for housing in the Parish with the need for smaller properties highlighted by the community. A Housing Needs Survey identified the need for 18 affordable houses and 22 small market homes. There is an imbalance in our housing stock which needs to be managed to meet current and future demand.	<p>Strongly Agree:</p> <p>The plan is positive about new housing and seeks to balance the housing stock within the community to meet housing need for affordable and market housing</p>
Landscape requires protection and enhancement	The Parish consists of three hill-top settlements which have a distinct and clear profile that is increasingly unique, and this distinct landscape needs to be protected. The landscape is important for 93% of our residents.	<p>Strongly Agree</p> <p>The plan has addressed protection of our hilltop profiles in our policies.</p>

Key finding	Impact upon the Neighbourhood Plan	Plan performance
Key local economic issues include the rural economy ⁴ , employability, place-making, enterprise and connectivity.	The Parish is not an economic centre but has a high number of commuters. There is an above average number of people working from home. There are rural businesses and a large number of businesses being run from home. However, only a small number of residents are employed in local businesses.	Strongly Agree The Parish is supportive of building new rural businesses and creating local employment.
Existing and future land use change puts soils at risk	The position of our settlements (on hilltops) means that any development could have adverse effects on our geology, for example spring lines.	Disagree: Although our plan looks to preserve the landscape the low level of historic and planned future change means this has not been specifically addressed
Waste reduction and recycling must improve	Reduce the production of waste, particularly as a result of development. Encourage greater local recycling.	Neutral: The plan supports efficient use of resources in development but changes in recycling strategies by TWBC mean household recycling has not been included in policy.
Water quality requires improvement	We are a rural community with limited access to mains drainage. The geology of the parish and our dependence on local bore holes for the majority of our drinking water supply, coupled with the prevalence of unregulated sewerage could endanger our water supply.	Agree: Ground water quality is important for Goudhurst and design and climate policies require the control, management and re-use of water resource.
Water resources are stressed	Encourage sustainable water use and ensure that designs for new development consider this provision.	Agree: Ground water quality is important for Goudhurst and design and climate policies require the control, management and re-use of water resource.

⁴ In this context, the rural economy is defined as land-based rural business such as agricultural and woodland management.

Section 6 Overall Analysis

6.1 Assessment Against High-level Objectives

In developing our policies we have sought to mitigate the impact of development on our landscape, environment and communities. Table 1 lists the overall objectives set out in our scoping document and provides a summary of how this objective has been achieved and the policies which deliver the objective.

Table 2 Sustainability Objectives for Goudhurst Parish

Topic	High Level Objective	Meeting this Objectives	Effective Policies
1. Air	Reduce air pollution	Our design policies are promoting sustainable development reducing the reliance on fossil fuels. Transport policies T2 and T3 promote the development of sustainable transport reducing pollution particularly in areas such as Goudhurst High Street. The plan promotes walking and cycling.	D3, T2, T3
2. Biodiversity	Protect and enhance biodiversity and the natural environment	The plan protects biodiversity in the Parish requiring a net gain in biodiversity from all development. Design policies set out the need for wildlife friendly elements (bat boxes, swift bricks) and also sets a policy to ensure boundaries are native hedges species. Design policies also seek to reduce pollution and the dependence on fossil fuels.	L6, D1, D2, D3,
3. Business Growth and employment	Encourage business growth and local employment	<p>The plan supports business related development for expansion and new services and the creation of employment within the Parish. The plan is positive towards development for both business and tourism and seeks to retain existing businesses and business floorspace within the Parish.</p> <p>Our projects support the provision of a community business hub offering networking and other facilities for home workers and small businesses.</p> <p>Parking is an issue for businesses in Goudhurst village and the plan seeks to improve parking in the village with specific projects and looks to ensure that new development in the Parish</p>	B1,B2, B3 T1, T2 Project P2 B2 B1, B2, B3

Topic	High Level Objective	Meeting this Objectives	Effective Policies
		<p>does not diminish the limited public parking available today.</p> <p>Enhance viability of the local economy by encouraging diverse employment opportunities.</p>	
4. Climate Change & Energy	Reduce carbon footprint and adapt to predicted changes	Our design policies support sustainable housing and promotes low carbon energy designs	D1
5. Deprivation	Reduce fuel poverty	Although Goudhurst is not high in deprivation the design policies promoted in the plan will provide for homes with low running costs.	D1
6. Education	Improve educational attainment and enhance the skills base	Our primary school is popular and although the catchment area changes from year to year (depending on sibling intake) we will monitor the impact of new development on school places and lobby the borough and county authorities as needed. We do not need a new school and as a neighbourhood plan we have no input into the county plans for schooling in our area.	Outside the scope of our plan
7. Equality	Increase social mobility and inclusion	Our plan promotes accessibility to all Parish facilities and supports development and improvement of those facilities. Parish communication improvements identified as a project will ensure all in the Parish are aware of activities and facilities.	C1 C2 P3, P4
8. Health & Wellbeing	Improve health and wellbeing, and reduce health inequalities	Health facilities were not identified as an issue by our residents and the plan has no specific policies, outside of protecting existing services and facilities. Our Parish has low crime levels but design considerations require the Secure by Design standards to be adopted.	C1, C2, C4,C6,D1
9. Heritage	Preserve and enhance historical and cultural heritage assets	Our plan protects our heritage and our landscape which also has historical significance. The plan describes an overall approach to preserving the heritage that exists both in and adjacent to the conservation areas	L1,L2,L3,L4,L5 C1,C4, C6, D4, B2, B1, B3

Topic	High Level Objective	Meeting this Objectives	Effective Policies
		<p>and identifies Green Spaces which are of importance to local people.</p> <p>Goudhurst is a central point for exploring the local countryside and the three pubs and two cafes are busy because of passing trade. The plan supports the retention and development of tourism to improve the local economy and to provide additional local employment.</p>	
10. Housing	Provide sufficient housing to meet identified needs	<p>Our plan aims to meet the identified need for affordable housing and looks to give priority to those with a local connection. There is an identified need for smaller properties over large detached houses for both younger and older residents.</p> <p>The plan promotes good design requiring sustainable building practices that conserve energy, water resources and materials, and maximise the proportion of energy generated from renewable sources</p> <p>Given the size of the Parish we will defer the management of self-build to TWBC.</p>	H1-H4, D1, D3
11. Land use	Protect soils, and reuse previously developed land and buildings	The plan prioritises developed sites over greenfield sites and supports the High Weald AONB management plan to protect and enhance this valuable landscape.	L1, L2, L6, L7, B3. D1,
12. Landscape	Protect and enhance landscape and townscape	<p>A key policy is the preservation of our hilltop settlements. With a drop of 90m over 1.7km Goudhurst is particularly striking in the landscape and conserving the profile of all our settlements is one of the cornerstones of our plan. The elevation changes have also driven the inclusion of views in our plan.</p> <p>The plan prioritises developed sites over greenfield sites and supports the High Weald AONB management plan to protect and enhance this valuable landscape.</p> <p>We have placed importance on the retention of our historic field patterns, routeways and</p>	L1. L2, L3, L4, L5,

Topic	High Level Objective	Meeting this Objectives	Effective Policies
		<p>farmsteads which characterise our Parish, and is recognised as internationally important by Natural England. A key element of our landscape is ancient woodland (27%) and the plan seeks to protect this.</p> <p>Dark skies are a feature of our Parish and we have looked to preserve these and reduce the impact of development of any kind on our 'nightscape'.</p>	
13. Noise	Reduce noise pollution	Noise in the Parish is related to the A262 which bisects the Parish. Although we have projects which aim to mitigate traffic issues, the Neighbourhood Plan can only seek to influence Highways Authorities and has no specific plans.	
14. Resources	Reduce the impact of resource consumption	Our plan recognises the impact resources required to deliver development and deprecates the demolition of viable properties to replace them with alternative dwellings. Our design considerations and design guidelines favour local materials where the palette of colours is set to complement the landscape.	D1,H5
15. Services & Facilities	Improve access to and range of services and facilities	Provision of improved broadband and mobile services is a need for both residents and businesses. The need to provide services for the young and old in our community is not something that fits easily with land use policies in a rural parish. However, a project activity has been identified to improve parish facilities for all.	C5, C6, P3, P4
16. Traffic	Reduce traffic congestion and improve road safety	The one common issue across the Parish is traffic which blights the High Street in Goudhurst and surrounding roads. The physical impact can be seen on Grade 1 heritage assets. In a Parish that has only limited development activity, the scope for change is small and land-use policies do not provide scope for the resolution of existing traffic issues. Where development takes place	T1, T2, T3, P2

Topic	High Level Objective	Meeting this Objectives	Effective Policies
		our policies look to improve the situation but a project has been initiated to take a lead in developing improvements.	
17. Travel	Improve travel choice and reduce the need to travel by private vehicle	<p>Reduce dependence on private cars</p> <p>Improve access to train stations</p> <p>Improve bus services</p> <p>Support car sharing initiatives</p> <p>Improve opportunities for active travel including cycling and walking</p>	
18. Waste	Reduce waste generation and disposal	Since initiating the plan major changes in recycling have been implemented by Tunbridge Wells.	
19. Water	Manage flood risk and conserve, protect and enhance water resources	<p>We are a Parish of ridgetop settlements and although there is a very small risk of flooding on the Parish boundary. Given the elevated position of the Parish and existing provision in the NPPF and the TWBC local plan we do not believe that a policy is required in our Neighbourhood plan.</p> <p>The risk of flooding and water run-off is important in our plan given Goudhurst's water abstraction plant, and our design considerations and our design guide require the use of recycling systems, particularly in new developments.</p>	D1, D3

6.2 External Concerns

Our plan cannot manage external constraints on our Parish

The Parish is not an island and many of our issues are connected with those in other parishes and the Borough. Development in other parishes, and in the Borough, has the potential to severely impact our plan and objectives.

The table below identifies areas of development which might impact Goudhurst and need to be monitored over time.

Table 3. Potential cumulative effects that must be considered by the Sustainability Appraisal.

Description of Cumulative Effect	Source for up to date information
Allocation of housing and development sites on the borders of our Parish that result in additional traffic and demand on services	TWBC can provide details of development in other parts of the Borough.
Approved planning applications for non-allocated housing and development sites across the Parish depending on scale	Development Management department at TWBC
Projects to be implemented by utility companies (within or outside the Parish)	These are projects initiated by South East Water, Southern Water, UK Power Networks, but advice on these is likely to come from the TWBC Planning Team.
Education projects to be implemented by a county council (within or outside the Parish)	Kent County Council East Sussex County Council
Failure to deliver on current housing targets for the Borough causes pressure on Goudhurst Parish or creates a 'planning by appeal' culture	Development Management department at TWBC and annual monitoring reports.
As Tunbridge Wells is a major economic centre, any development to the east of Goudhurst will increase traffic volumes through the Parish.	Development Management department at TWBC, Maidstone and Ashford and Weald.

When preparing the Sustainability Appraisal, the sources of up to date information listed in Table 3 will be accessed to determine if cumulative effects are likely to arise.

Section 7 Policy Assessment

All policies were scored using the matrix in appendix A

Plan policies have been assessed using the scoring matrix set out in appendix A of the Sustainability Analysis Scoping Document. The processes recognises that there are inherent conflicts between objectives for example business growth is incompatible with climate change and energy and to simplify the overall process, where these conflicts exist, an assessment measure has not been taken.

The table below provides a more detailed assessment of each relevant policy by objective. Scores are shown as positive or negative in a range of +3 to -3. Some policies are neutral and these are shown as neutral.

SEA Objective	Policies	Assessment	Analysis
Reduce air pollution	L7	+	<p>Although there are no Air Quality Management Areas (AQMAs) in the Parish (the nearest is approximately 20 km to the north-west) we have considered our dependence on fossil fuels for heating. Our design policies focus on quality development and our climate change policy provides clear requirements for efficient and future proofed dwellings.</p> <p>There are concerns over further increases in traffic congestion as a result of developments within and to the east of the Parish. Goudhurst High Street, which sits on the A262 and B2097, suffers from traffic congestion and this, coupled with high buildings (3 storeys) can create poor air quality in the High Street. Traffic policies and projects look to mitigate impact and improve the position.</p>
	B1	-	
	B3	-	
	D3	++	
	T2	-	
	P2	++	
Protect and enhance biodiversity and the natural environment	L6	+++	<p>The plan proposes a positive gain in biodiversity from all development.</p> <p>The retention of trees and the planting of new trees will contribute to this. The retention of dark skies will reduce the impact on wildlife and the designation of green spaces will ensure we can retain areas of special interest. Good design, the protection of hedgerows, boundary treatments and the management and use of surface water will contribute to improve the natural environment.</p>
	L7	++	
	L8	+	
	L9	+	
	D1	+	
	D2	++	
Encourage business growth and local employment	C5	+++	<p>The plan is supportive of the retention of businesses in the Parish, business growth and for growth in employment in the Parish.</p> <p>The need for improved communication is identified both in terms of supporting mobile and broadband services and in the provision of written and visual communications.</p>
	H2	+	
	H3	+	
	B1	+++	
	B2	+	

	B3 P4	+++	Housing policies also support the provision of affordable housing so that businesses have a wider choice of staff and residents have wider employment opportunities.
Reduce carbon footprint and adapt to predicted changes in climate	L6 L7 C6 H5 H6 B3 D1 D3	+ + + -- + + ++ +++	Development generally has a negative impact on climate change and energy usage (Business growth, housing, traffic and transport). The replacement of existing dwellings adds significantly to the resources required to create a dwelling. The plan deprecates the unnecessary use of resources. Our landscape policies work to protect areas of importance in our landscape, and our design considerations and our adoption of the HWAONB design guidelines ensure that development in the Parish uses less energy and natural resources in construction and in operation. Our plan requires new development to be more efficient and future proofed and promotes live-work developments to reduce travel. Design policies positively support improvements in climate change.
Reduce fuel poverty	H3 H4	+ +	Although we are not in an area of high deprivation, the high standards of design, the commitment to affordable housing in the community and the allocation of housing to tenants with local connections will provide some level of improvement.
Improve educational attainment and enhance the skills base	C5	++	Improvements in broadband will have some level of positive impact on education, but there is limited scope within our Parish to improve the delivery of education.
Increase social mobility and inclusion	C2 C5 C6 H1 H2 H3 H4	+ + + ++ + ++ ++	Our policies will improve access to facilities for all in our communities. Broadband improvements will improve opportunities for education, and our housing policies, with focus on housing mix, will provide opportunities for housing for all residents (particularly the young and those downsizing). The provision of affordable housing with allocation prioritised for those with a local connection will allow more people to remain local.
Improve health and wellbeing, and reduce health inequalities	L5 L6 L7 L9 L10	+ + + + +	Health facilities were not identified as an issue by our residents and the plan has no specific policies, outside of protecting existing services and facilities to improve health. Conserving our landscape and heritage reflects the value residents place on these attributes. Although our Parish has low crime our design considerations require 'Secure by Design'

	C1	+	<p>standards to be adopted to ensure the overall levels of crime does not increase.</p> <p>The provision of smaller houses reflects the needs expressed by residents and captured in the Housing Needs Survey for smaller houses for younger families wishing to remain in the community and older residents wishing to downsize.</p> <p>Improving and extending the footpath network will support health and wellbeing of residents and visitors.</p>
	C2	+	
	C6	++	
	H1	+	
	H2	+	
	H3	++	
	H4	++	
Preserve and enhance historical and cultural heritage assets	L1	+	<p>Settlements in the Parish are built on ridgetops with steep slopes which offers a unique landscape valued by residents and also by the wider community. The Conservation Areas in Goudhurst and Kilndown are re-enforced by the plan and the guidance provided around design, using the documents developed by the High Weald AONB unit (HWAONB) further support the enhancement of the historic centres of our Parish.</p> <p>Congestion is an issue in the historic centre of Goudhurst village and our policies set high standards for parking in order to protect Goudhurst from further congestion.</p>
	L2	+	
	L3	++	
	L4	+++	
	L5	++	
	L10	+	
	C1	+	
	D1	++	
	D4	+++	
	D5	++	
	D6	++	
	T1		
Provide sufficient housing to meet identified needs	H1	+++	<p>The need for additional housing in the Parish is recognised and the Neighbourhood Plan has taken a positive approach to planning in our parish. The policies look to deliver housing that meets local housing need and supports residents in remaining in our community.</p> <p>Design policies provide for high quality housing across the Parish.</p>
	H2	+++	
	H3	+++	
	H4	++	
	H5	+	
	H6	+	
	D3	++	
	D4	+	
	D5	+	
	D6	+	
	T1	+	

Protect soils, and reuse previously developed land and buildings	H4 T1	- -	The plan supports the re-use of brownfield sites across the Parish and the conversion of redundant buildings to residential or other business use. Further, the plan supports the High Weald AONB management plan to protect and enhance this valuable landscape.
Protect and enhance landscape and townscape	L1 L2 L3 L4 L5 L6 L7 L8 D1	+ + + + ++ + + + +	The position of Goudhurst village and other settlements on ridgetops provides a dramatic setting for our community. From the churchyard the land falls 98m to the Teise valley below over a distance of 1.7km. Policies support the conservation of land within the AONB and other areas in the Parish that adjoin the AONB. Policies address a number of aspects of landscape character looking to conserve the landscape profiles of our settlements. Elements of landscape, (views, green spaces, trees, light pollution) are also addressed providing a broad range of polices supporting managed change.
Reduce noise pollution	D3	+	Increased traffic will impact noise in the centre of our main village.
Reduce the impact of resource consumption	C3 H5 D3	++ --- +	All development will impact the use of resources. Replacement dwellings, which the plan deprecates, will result in an increase in the resources required to deliver a dwelling.
Improve access to and range of services and facilities	C1 C3 C6 B2	+ ++ ++ +	Provision of improved broadband and mobile services is a need for both residents and businesses. The need to provide services for the young and old in our community is not something that fits easily with land use policies in a rural parish. However, a project activity has been identified to improve parish facilities for all and policy C6 is intended to deliver improvements in the Parish footpath network.
Reduce traffic congestion and improve road safety	H1 H2 H4 H6 B1 B3	-- - - - -- +	All development will have some impact on traffic congestion. Within the Parish policies require traffic impacts, associated with development, to be mitigated. However, policies which support business and employment growth will likely have a negative impact on traffic and congestion. Development which will have the biggest impact on traffic congestion and road safety will be located in neighbouring

	T1	-	parishes, particularly in the east and as such it is outside of the scope of the Goudhurst Neighbourhood plan.
	T2	+	
	T3	++	
Improve travel choice and reduce the need to travel by private vehicle	C6	+	As a rural parish with poor public transport there is an inherent dependence on the private car.
	H4	+	
	H6	++	More housing for local people may reduce the travel to work as will the provision of live-work development. Our traffic polices will improve safe access, particularly for pedestrians so our residents can feel safe walking and riding through the Parish in particular when using the footpath network. The Plan supports the retention and development of the footpath network.
	B3	+	
	T2	++	
	T3	+	
Reduce waste generation and disposal	D3	+	Policy D3 promotes the efficient use of resources and the recycling and reuse of resources in development. Since initiating the plan major changes in recycling of household waste have been implemented by Tunbridge Wells.
Manage flood risk and conserve, protect and enhance water resources	D1	+	Policy D3 promotes best practice in urban drainage and D1 requires the use of renewable technologies which specifically mentions the re-use of rain and grey water.
	D3	+	

Think about the impact across a range of policies by group, need to think about how we manage the range of results --- to +++

Section 8 Appendix A – SA Scoring Matrix

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

Figure 4. Compatibility testing of Sustainability Objectives.

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

Figure 5. Compatibility testing of Sustainability Objectives.

Each of the relationships have been assessed and the potential conflicts identified.

Table 4. Conflicts between Sustainability Objectives

Objectives	Conflict
(10) Housing, (6) Education	Meeting housing needs will increase demand for school places
(10) Housing, (15) Services & Facilities	Meeting housing needs may increase pressure on existing services and facilities
(10) Housing, (3) Business Growth and Employment	Meeting housing needs may reduce economic floor space
(10) Housing, (4) Climate Change & Energy	Meeting housing needs could increase the Parish’s carbon footprint
(10) Housing, (5) Deprivation	Expense of purchasing a home may reduce disposable income
(11) Housing, (19) Water	Meeting housing needs will increase water consumption and could exacerbate flood risk and threaten water quality
(10) Housing, (1) Air, (13) Noise, (16) Traffic	Meeting housing needs will increase traffic
(10) Housing, (2) Biodiversity, (8) Health & Wellbeing, (11) Land Use, (12) Landscape	Meeting housing needs requires development on greenfield sites and may impact upon the Ashdown Forest SPA and SAC, and the High Weald AONB.
(10) Housing, (9) Heritage	Meeting housing needs could affect the setting of existing heritage assets. Insulation for older buildings may alter their appearance
(10) Housing, (18) Waste	Meeting housing needs will increase waste

Objectives	Conflict
(10) Housing, (14) Resources	Meeting housing needs will increase the impact of resource consumption
(3) Business Growth & Employment, (1) Air, (13) Noise, (16) Traffic, (17) Travel	Supporting business growth could increase traffic and put increased pressure on public transport networks
(3) Business Growth & Employment (2) Biodiversity, (9) Health & Wellbeing, (12) Land Use, (13) Landscape	Supporting business growth may require development on greenfield sites with landscape and biodiversity importance.
(3) Business Growth & (4) Climate Change & Energy	Supporting business growth could increase the Parish's carbon footprint
(3) Business Growth & Employment (9) Heritage	Supporting business growth could affect the setting of existing heritage assets
(3) Business Growth & Employment (18) Waste	Supporting business growth will increase waste
(3) Business Growth & (14) Resources	Supporting business growth will increase the impact of resource consumption
(3) Business Growth & Employment (19) Water	Supporting business growth will increase water consumption and could exacerbate flood risk and threaten water quality
(4) Climate Change & (2) Biodiversity & Energy (12) Landscape (9) Heritage	Some renewable energy technologies can impact negatively on landscape character, biodiversity and heritage assets
Air Quality, (16) Traffic	Increases in traffic volumes and subsequent congestion will damage air quality
(4) Climate Change, (16) Traffic	Goudhurst is dependent on the car with high levels of car ownership and this is also coupled with high levels of long-distance commuting

8.1 Proposed Methodology

All proposals in the Goudhurst Neighbourhood Plan will be scored to ensure they are compatible with the Sustainability Objectives identified by this document. For consistency we will use the same scoring methodology used by TWBC in their Sustainability Scoping document.

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

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

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

When determining what score should be applied for environmental issues, the criteria identified by the SEA Directive would be referred to (see Figure 6).

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

Figure 6. Criteria listed by the SEA Directive for determining the likely significance of effects.

For social and economic issues, we have developed a series of measures which provide a base set of criteria to be used when scoring.

When applying scores, it will normally be assumed that mitigation measures are not available. Instead, suggestions of how mitigation can be applied will be included in a commentary box. This aspect will be described in further detail in the Stage B Sustainability Appraisal Report.