

Tunbridge Wells Local Plan Review Strategic Environmental Assessment Scoping Report Draft

02 July 2026

Prepared for:
Tunbridge Wells Borough Council

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Document Status

Issue date	02 July 2026
Issued to	Tunbridge Wells Borough Council
BIM reference	QLN-JBA-XX-XX-RP-EN-0001-S3-P03
Revision	P03
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Abbreviations

ALC	Agricultural Land Classification
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
DEFRA	Department of Environment, Food and Rural Affairs
EA	Environment Agency
EIP	Environmental Improvement Plan
GHG	Greenhouse Gas
IDP	Infrastructure Delivery Plan
IMD	Index of Multiple Deprivation
KCC	Kent County Council
LFRSM	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
NCN	National Cycle Network
NPPF	National Planning Policy Framework
PHE	Public Health England
PROW	Public Right of Way
RBMP	River Basin Management Plan
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SME	Small-Medium Enterprise
SPD	Supplementary Planning Document
TPO	Tree Protection Order
SSSI	Site of Special Scientific Interest
TWBC	Tunbridge Wells Borough Council
WFD	Water Framework Directive

Executive Summary

Tunbridge Wells Borough Council (TWBC) are currently developing their emerging Local Plan Review to provide a long-term strategy for the borough, covering the period from 2029-2044. The new Plan will take into account any shortfall against the required housing need, the most recent 2024 iteration of the National Planning Policy Framework (NPPF), and the climate emergency that was declared for the borough in 2019. The emerging Local Plan Review will set out the strategic priorities for development in the borough and include allocations for housing, employment and other development, as well as supporting infrastructure across the borough. This scoping report has been prepared as part of the Strategic Environmental Assessment (SEA) of the Local Plan Review, as required by the Environmental Assessment of Plans and Programmes Regulations 2004.

The purpose of this report is to inform the SEA and plan-making process through the identification of potential significant environmental issues within the local plan area.

SEA is a process for assessing the social, economic and environmental impacts of a plan, with the aim of ensuring that sustainable development principles are integrated into the plan-making process. This focuses the SEA on issues which are relevant to the Local Plan Review and if the effect on the environment is likely to be significant, whether positive or negative. Following a review of the current baseline, a future baseline is presented to identify key environmental, social and economic trends without the proposed plan. Using the key sustainability issues captured in the baseline desk study, an assessment framework has been developed alongside proposed scoring methodology. The Framework is comprised of a series of objectives and associated appraisal criteria and will be applied to the assessment of the Local Plan Review in the later stages of the SEA.

For this assessment, it was deemed necessary to scope in all topics assessed in the baseline study. The reasons for this have been outlined within Table 6-2. The borough is facing a challenging period due to the increased development required to meet government housing targets, and the impacts of this are being exacerbated by more extreme weather events, including worsening flood events and extreme heat as a result of climate change as well as water stress. This is having a consequential effect in all areas of the environment and local communities that have been assessed within the baseline study, to varying extents. The borough should encourage more sustainable design for new developments and propose environmentally-friendly approaches that can be implemented into everyday life for local people, contributing to the creation of a more climate resilient community in the process.

The assessment approach has been developed, describing types of effects to be considered, and any transboundary effects. The next stage of the SEA will be to undertake consultation with statutory consultees identified. The results of the consultation process will feed into future stages of the SEA and Local Plan Review development.

This scoping report also sets out the next steps regarding the approach to SEA, including consultation with the statutory bodies within England.

1 Introduction

1.1 Overview

Tunbridge Wells Borough Council (TWBC) is preparing a Local Plan Review for the whole borough which will replace the existing Tunbridge Wells Borough Local Plan (2020-2038), which was adopted in December 2025. This replaced the former Tunbridge Wells Local Plan (2006), the Core Strategy (2010) and the Site Allocations Local Plan (2016).

This Strategic Environmental Assessment (SEA) Scoping Report represents the first stage of the SEA process. It provides a description of the baseline environmental characteristics and key environmental and sustainability issues of relevance to the borough, and identifies other relevant plans, programmes and policies that may influence the development of the Local Plan Review. The Scoping Report also establishes an appraisal framework that will be used to examine the sustainability impacts of implementing the Local Plan Review policies and objectives. The framework comprises a series of SEA objectives and associated appraisal criteria that reflect the key sustainability issues identified through the baseline review.

This Scoping Report draws upon a wide range of existing information. A draft version of the Scoping Report will be published for consultation with the statutory consultation bodies (Natural England, Historic England and the Environment Agency) for a five-week period. The scope of the SEA will be revised as necessary to address the consultee comments received before a final version of the Scoping Report is published. Furthermore, Tunbridge Wells Council expects to consult on this Scoping Report as part of its Local Plan Review Scoping Consultation, which will be a high level consultation relating to what the Local Plan Review should contain and how people wish the Council to engage with them during the plan production.

1.2 Sustainability Appraisal and Strategic Environmental Assessment

SEA is a process for assessing the social, economic, and environmental impacts of a plan, with the aims of ensuring that sustainable development principles are integrated in the plan-making process.

Under the new Local Plan Regulations 2026, SA is no longer required, but requirements are instead set out for conducting SEAs on new Local Plans. The Local Plan Regulations 2026 require an SEA if the criteria set out in Regulation 5 of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) is met. Regulation 5 requires an environmental assessment of a plan or programme which "is prepared for...town and country planning" (SEA Regulations 2004). Therefore, a SEA has been scoped in, for which this Scoping Report has been prepared.

SEA does not typically include social and economic considerations, such as population and human health, but for the purpose of producing an encompassing assessment of

sustainability impacts, and due to the current transitional plan making period where new SEA guidance has not yet been released, it was considered more appropriate to take a comprehensive approach to the Scoping stage and include these topics. New SEA guidance is anticipated to be published soon.

In line with Government guidance, SEA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'SEA Regulations') which implements the requirements of the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. The Directive requires the formal assessment of plans and programmes that are likely to have significant effects (either positive or negative) on the environment.

2 Tunbridge Wells Local Plan Review

2.1 Policy context

The current Local Plan 2020-2038 was adopted in December 2025 and forms part of the development plan guiding future development in the borough of Tunbridge Wells.. It identifies a number of challenges that the borough will face over the coming years and then sets out an overarching spatial vision and policies to address these challenges, to help create a place which meets the needs of the borough and local communities.

Examination of the draft Local Plan 2020-2038 was completed in October 2025. The plan was deemed an appropriate basis for planning of the borough, provided that Main Modifications were made as recommended by the Planning Inspector. One modification required an early review of the Local Plan in Policy STR1. Policy STR1 sets out housing requirements, which was calculated using the standard method formula to determine minimum annual housing need, taking into account of projected housing growth and historic under-supply. At the point of Local Plan submission, this equated to 678 dwellings per year, or 12,204 dwellings over the 2020-2038 plan period. While this level of provision was considered acceptable for the purposes of the Plan, it is subject to an early review following adoption. A further modification required an update to the housing trajectory within the emerging Local Plan.

The new Local Plan Review will set out the strategic priorities for development in the borough. This will include allocations for housing and, employment development and other development and supporting infrastructure, and will set out the criteria against which planning applications for the development and use of land and buildings will be considered. In addition, the Local Plan Review will seek to address local needs in terms of community facilities and infrastructure and set out policies for promoting and protecting key environmental features and resources within the area, adapting to climate change and securing good design.

2.2 Study area

The Borough of Tunbridge Wells is a borough taking its name from its main town of Royal Tunbridge Wells. It is located in the South East of England in the county of Kent, as shown in Figure 2-1. The borough has an area of 127.9 square miles and has a population of 119,694 (ONS, 2024). The neighbouring districts consist of Maidstone Borough Council, Ashford Borough Council, Tonbridge and Malling Borough Council, Sevenoaks District Council, Rother District Council and Wealden District Council. Tunbridge Wells Borough lies along the southwestern border of Kent, on the northern edge of the Weald. Much of the borough is located within the High Weald National Landscape, previously known as the High Weald Area of Outstanding Natural Beauty (AONB).

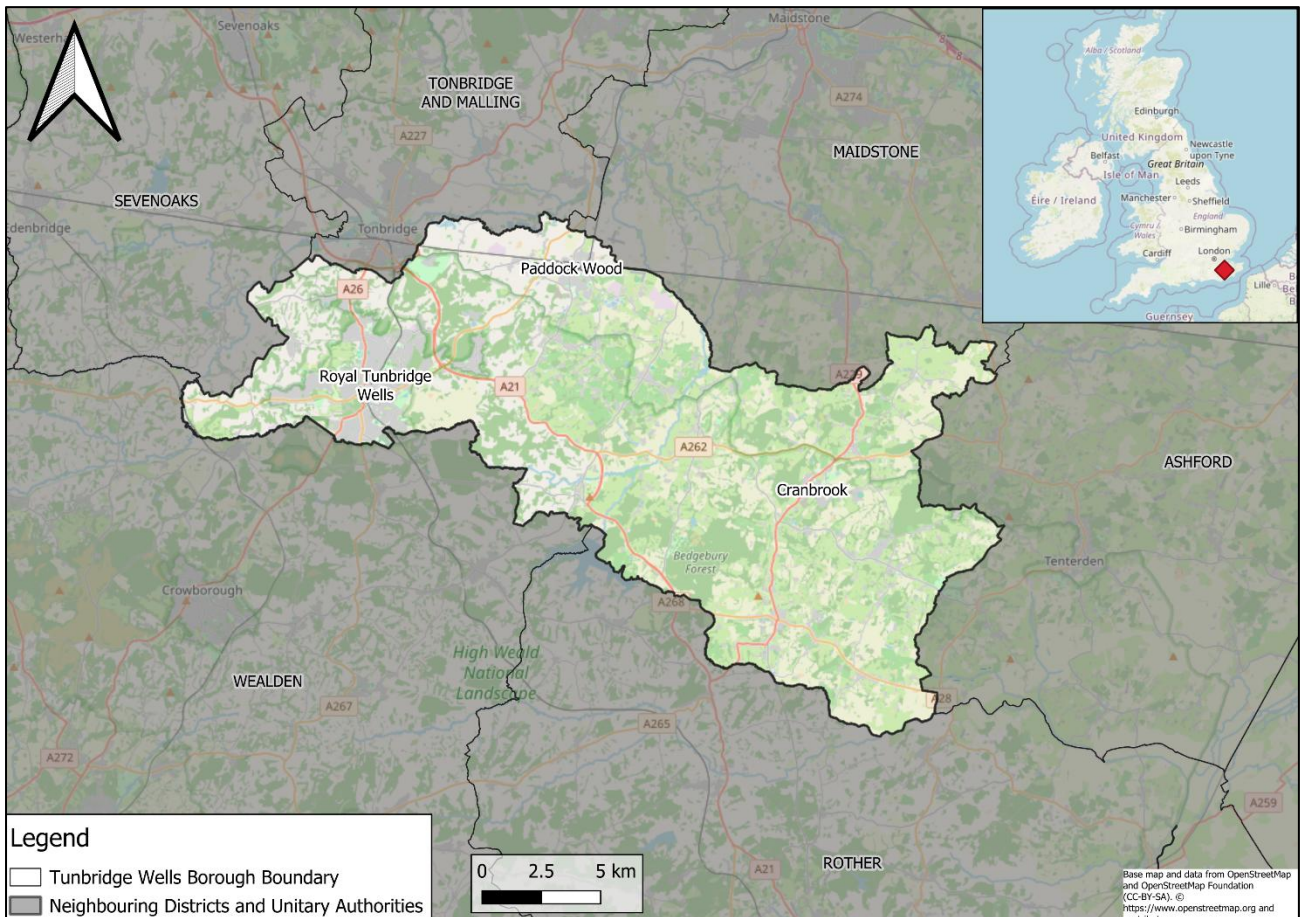


Figure 2-1. Location of Tunbridge Wells Borough.

3 Strategic Environmental Assessment Scoping Methodology

3.1 Overview of the SEA Process

SEA is an iterative process that is undertaken during the development of plans, programmes and strategies to ensure that any potential significant environmental effects arising from them are identified, assessed, mitigated and communicated to plan-makers.

SEA also requires the monitoring of any identified significant effects and for potential unforeseen effects once the plan/programme/ strategy is implemented. The intention is that the SEA is fully integrated into the plan-making process from the earliest possible stages, both informing and being informed by it. By identifying issues at an early stage, it is then possible to amend the policies/ plans to ensure they as sustainable as possible.

As outlined above, SEA informs the decision-making process through the identification and assessment of both significant and cumulative environmental effects from a plan or programme, or its reasonable alternatives. Significant effects are defined as those that may cause substantial, potentially substantial adverse, or beneficial changes to the existing environmental baseline. In this case it involves assessing the TWBC Local Plan Review against a series of SEA objectives.

Government guidance (ODMP, 2005) requires that SEAs should incorporate the requirements of the SEA Regulations. This SEA Scoping report has been prepared in compliance with these regulations. It is expected that new SEA guidance will be published in the near future, that aligns with the Local Planning Regulations 2026, and any further SEA reports will be prepared in accordance with this new guidance where possible.

In practice, SA and SEA follow very similar methodologies and therefore it is possible to combine them without losing the essence of either. For the remainder of this document SEA refers to this combined approach.

Schedule 2 of the SEA Regulations sets out the scope of the information to be provided across the SEA process. Table 3-1 below identifies where in the SEA process each requirement is met within this SEA Scoping report.

Table 3-1: Requirements of the SEA process as identified within Schedule 2 of the SEA Regulations.

SEA Regulations requirements	Where in the SEA
a) an outline of the contents, main objectives of the plan or programme and its relationship with other relevant plans and programme;	SEA Scoping Report (Section 4)
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	SEA Scoping Report (Section 5)
c) the environmental characteristics of areas likely to be	SEA Scoping

SEA Regulations requirements	Where in the SEA
significantly affected;	Report (Section 5)
d) 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 79/409/EEC on the conservation of wild birds (a) (amended Wildlife and Countryside Act 1981) and the Habitats Directive 92/43/EEC (transposed into UK law through the Conservation of Habitats and Species Regulations 2017 (as amended);	SEA Scoping Report (Section 5)
e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been considered during its preparation;	SEA Scoping Report (Section 5)

Schedule 2 requirements (f) through to (j) will be addressed in the SEA Environmental Report which is yet to be prepared.

3.2 Stages of the Strategic Environmental Assessment process

The SEA guidance (ODMP, 2005) sets out a five-stage process (A to E) to be followed. This Scoping Report addresses Stage A of this process, wherein the context and objectives of the SEA are identified, and the scope of assessment is determined. For the purposes of this assessment, stages A1 to A4 will be completed - stage A5 includes consultation on the Scoping Report which will be conducted as outlined in Section 9.1 of this document. Stages and tasks associated with B-E will be addressed in the SEA Environmental Report which will be prepared in due course alongside the production of the TWBC Local Plan Review.

Table 3-2: Stage A and associated tasks in the SEA process.

Stages and tasks	Purpose	Where covered in the SEA
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope.	SEA Scoping Report
(A1) Identify other relevant plans, programmes and environmental objectives	To establish how the plan or programme is affected by outside factors, to suggest ideas for how any constraints can be addressed and to help identify SEA objectives.	SEA Scoping Report (Section 5.x.1 of each baseline topic chapter and Appendix A)
(A2) Collecting baseline information	To provide an evidence base for environmental problems, prediction of effects and monitoring; to help in the development of SEA objectives.	SEA Scoping Report (Section 5)

Stages and tasks	Purpose	Where covered in the SEA
(A3) Identifying potential environmental problems	To help focus the SEA and streamline the subsequent problems, prediction of effects, and monitoring; to help in the development of SEA objectives.	SEA Scoping Report (Section 5)
(A4) Developing SEA objectives	To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed.	SEA Scoping Report (Section 7)

3.3 SEA Scoping Methodology

3.3.1 Stage A1: Identifying other relevant policies, plans and programmes, and environmental protection objectives.

The relationship between various policies, plans, programmes, and environmental protection objectives may influence the Local Plan Review. The relationships are analysed to:

- Identify any external social, environmental or economic objectives that should be reflected in the SEA process;
- Identify external factors that may have influenced the preparation of the Local Plan Review; and
- Determine whether the policies in other plans and programmes might lead to cumulative or synergistic effects when combined with policies in the Local Plan Review.

The plans and programmes that need to be considered include those at the international, national, regional and local scale. These are identified and evaluated in Section 4.

3.3.2 Stage A2: Collecting baseline information.

SEA guidance and the SEA Regulations identify a range of environmental and sustainability topics that must be considered during the assessment process. These topics are identified in Table 3-3 alongside the sustainability issues and indicators.

Baseline information has been collected in relation to each of these topics, many of which are inter-linked. A desk study was undertaken to identify baseline information, which was used to determine the key environmental, social and economic characteristics of TWBC area. The information search included, but was not limited to, information from a range of sources including the following organisations:

- Tunbridge Wells Borough Council
- Natural England
- Office for National Statistics
- Historic England

- Kent County Council
- Department for Environment, Food & Rural Affairs (Defra)
- Environment Agency

Where information was available, key sustainability targets and objectives have been identified; established and predicted trends in the status or condition of environmental features have been described; and significant environmental and sustainability issues have been highlighted. Trends evident in the baseline information have been used to predict the future baseline situation for the period up to 2044, which has assumed a continuation of the existing trends in some cases.

Sustainability topics to be covered in the SEA are split into environmental, social and economic topics, as outlined in Table 3-3 below.

Table 3-3: Topics to be included in the Strategic Environmental Assessment.

SEA Directive and SEA guidance requirements	Where covered in the Scoping Report	Definition in relation to this report
Air	Section 5.11	Air quality in relation to government objectives, measured levels of potentially harmful substances within the air
Biodiversity (including flora and fauna)	Section 5.3	Designated nature conservation sites; protected and notable species and habitats; trends in condition and status.
Climatic factors	Section 5.10	Regional climate patterns; trends in greenhouse gas emissions and the sources of these emissions; mitigation measures and adaption to manage climate change
Cultural heritage	Section 5.6	Protected and notable heritage features; pressures on heritage features (including changes to setting).
Population and human health	Section 5.7	Population trends and demographics; education; inequality and deprivation; accessibility; key trends and patterns in human health.
Landscape	Section 5.2	National and local landscape character; protected and notable landscapes; key local landscape features.
Infrastructure	Section 5.9	Critical infrastructure (including transport and other infrastructure), community services; and green infrastructure.

SEA Directive and SEA guidance requirements	Where covered in the Scoping Report	Definition in relation to this report
Soil	Section 5.5	Variety of rocks, minerals and landforms; the quantity and distribution of agricultural land including the highest quality soils; soil health and functions, designated geological sites; land contamination.
Water	Section 5.4	The availability/ supply and quality of water. It considers in turn surface and groundwater resources, chemical and biological water quality; surface and groundwater resources; flood risk.
Interrelationship between the above factors	N/A	The relationship between environmental features and issues.

3.3.3 Stage A3: Identifying environmental and sustainability issues and problems.

The identification of significant sustainability issues of direct relevance to Tunbridge Wells Borough is an important step in establishing an appropriate appraisal framework. Such issues have been identified directly through the baseline information review or identified by evaluating the relationship between the aims of the SEA and the established environmental baseline.

3.3.4 Stage A4: Developing the Strategic Environmental Assessment objectives.

SEA objectives are a key tool used to assess the potential positive and negative environmental and sustainability effects of the Local Plan Review. Together with associated appraisal criteria, they form an assessment framework that provides a means to predict, describe and analyse the effects that are likely to arise from the implementation of the Plan policies. The Plan options and policies will be appraised individually against each SEA objective, thereby allowing environmental, economic, and social effects, in particular those which are significant, to be identified.

4 Relevant Plans, Programmes and Environmental Objectives

4.1 Overview

As part of the SEA process, an assessment of the integration of existing policies, plans and programmes on the Local Plan Review has been undertaken. This is required under Schedule 1 of the SEA Regulations:

- a. "The degree to which the plan or programme sets a framework for projects and other activities either with regard to the location, nature, size and operating conditions or by allocating resources;
- b. the degree to which the plan or programme influences the other plans and programmes including those in a hierarchy;
- c. the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development; and
- d. environmental problems relevant to the plan or programme; and the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)"

No list of plans or programmes can be definitive and as a result, all policies, plans and programmes which are considered relevant to the development of the Local Plan Review have been listed below and are detailed in Appendix A. Relevant policies, plans and programmes are described in further detail in the policy context section of each environmental topic in Section 5.

International:

- Aarhus Convention 1998
- Strategic Environmental Assessment (SEA) Directive (2001/42/EC)
- EU Directive on the conservation of wild birds (79/409/EEC amended to 2009/147/EC)
- EU Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC)
- EU Convention for the protection of Archaeological Heritage (1992)
- EU Landscape Convention (Florence Convention) 2000
- United Nations Framework Convention on Climate Change, Paris Agreement (2016)
- European Sustainable Development Strategy (2006)
- EU Air Quality framework directive on ambient air quality (2008/50/EC, 2004/107/EC, 2015/1480/EC)
- Transforming Our World: The 2030 Agenda for Sustainable Development (2015)

National:

- Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations 2019
- The air quality strategy for England 2023
- Air Quality (England) Regulations 2000
- Ancient Monuments and Archaeological Areas Act 1979
- Clean Air Strategy (2019)
- Climate Change Act 2008
- Contaminated Land (England) Regulations 2006
- Control of Pollution Act 1974
- Countryside and Rights of Way Act 2000
- A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- The Environmental Improvement Plan 2023 (First Revision of the 25 Year Environment Plan)
- Environment Act 1995
- Environment Act 2021
- Environmental Noise (England) Regulations 2006
- Environmental Protection Act 1990
- Equality Act 2010
- Health and Social Care Act 2012
- Historic Buildings and Ancient Monuments Act 1953
- Housing and Planning Act 2016
- The Levelling-up and Regeneration Act 2023
- Localism Act 2011
- Local Nature Recovery Strategies (LNRS)
- The Flood and Water Management Act 2010
- National Framework for Water Resources 2025: water for growth, nature and a resilient future.
- National Bus Strategy: 2024 Bus Service Improvement Plans
- Natural Environment and Rural Communities (NERC) Act 2006
- National Planning Policy Framework (2024)
- Revised National Planning Policy Framework (expected 2026)
- National Planning Policy for Waste (2014)
- National Parks and Access to the Countryside Act 1949
- Planning (Listed Buildings and Conservation Area) Act 1990
- Planning and Infrastructure Act 2026
- Health Equity and Public Health Strategy 2025-2028
- Safeguarding Our Soils: A Strategy for England (Defra, 2009)
- Securing the Future - the UK Government Sustainable Development Strategy (2005)

- Surface water management action plan (2018) (updated 2021)
- The Carbon Plan (2011)
- Carbon budget and growth delivery plan (2025)
- Third National Adaptation Programme (NAP3) (2023)
- UK Climate Change Risk Assessment 2022
- Wildlife and Countryside Act 1981 (as amended)

Regional:

- High Weald AONB Management Plan 2024-2029
- Kent Biodiversity Strategy 2020 to 2045
- Kent and Medway Local Nature Recovery Strategy
- Kent County Council Environment Plan 2025
- Kent County Council Flood Response Plan (2023)
- Kent and Medway Growth and Infrastructure Framework 2018
- Kent County Council Land Drainage Policy (2019)
- Kent Local Flood Risk Management Strategy 2024-2034
- Kent Local Transport Plan 5: Striking the Balance
- Kent County Council's Rights of Way Improvement Plan 2018-2028
- Plan Tree: Kent County Council's Tree Establishment Strategy 2022-2032

Local:

- Air Quality Action Plan 2018 to 2038
- Biodiversity Action Plan (2008)
- Borough Climate Change Strategy (2025)
- Cultural Strategy 2014-2024
- Housing, Homelessness and Rough Sleeping Strategy 2026-2031
- Infrastructure Delivery Plan (2021)
- Local Cycling and Walking Infrastructure Plan Phase 1 (2019)
- Sports and Active Recreation Strategy 2016-2021
- Strategic Flood Risk Assessment (2019)
- Strategic Housing and Economic Land Availability Assessment (2021)
- Transport Strategy 2015-2026
- Tunbridge Wells Borough Council Strategic Plan 2024-2032
- Tunbridge Wells Borough Council Infrastructure Delivery Plan (2025)
- Tunbridge Wells Borough Council Local Development Plan (which currently consists of The Tunbridge Wells Borough (Adopted 2025), the Kent Minerals and Waste Local Plan 2024-2039 and Made Neighbourhood Plans)
- Tunbridge Wells Stage 1 Surface Water Management Plan (2013)

The policies listed above represent the relevant policies identified at the time of writing and will be refreshed at later stages of the SEA process to capture the Local Plan Review evidence base. Documents listed above which are part of the evidence base for the

adopted Local Plan will be updated as part of the Local Plan Review (such as the SFRA, SHELAA and IDP).

4.2 Identification of key themes and messages

The main themes, messages and objectives from the policies, plan and programmes review that are considered relevant to the SEA are presented below:

- Preserve and maintain the landscape characteristics of the borough, particularly in the High Weald National Landscape.
- Protect the ecosystem services of the borough and the designated sites and priority habitats that contribute to this, in the face of increasing development pressures.
- Enhance flood management efforts in order to adapt to flood risk from the River Medway and other water courses within the borough and the risk of surface water flooding, both of which are likely to be exacerbated by climate change impacts.
- Adapt to the impacts of climate change such as increased drought and extreme weather events, particularly regarding water resource and supply.
- Focus any new development on brownfield land where possible, ensuring higher grade agricultural land is protected from development.
- Protect the heritage assets of the borough and their historic settings.
- Reduce deprivation inequality across the borough in priority areas such as education, health and access to services.
- Ensure adequate employment spaces are available to serve the local workforce.
- Improve the quality and availability of local green infrastructure, and sports and recreational facilities.

The themes, messages and objectives identified will provide an input into the process of identifying key issues and opportunities and developing the SEA framework.

4.3 Setting out the assessment factors to assess

Section 6 proposes the scope of the assessment; Section 7 outlines the SEA Framework and Section 8 provides the methodology of the assessment. Section 9 sets out the next steps in the SEA process.

4.4 Consulting on the scope of the SEA

This Scoping Report has been prepared to consult with the statutory SEA consultation bodies on the proposed scope of the SEA, as outlined in Section 9.

This consultation and scoping exercise are the initial steps for environmental representation to inform the Local Plan Review. It will help to understand which environmental effects of the Local Plan Review are a concern and can provide additional information which should be taken into consideration.

5 Environmental Characteristics and Key Issues

5.1 Introduction

This section covers information on the current environmental baseline in the study area and summarises the key information from the policies, plans and programmes which need to be considered in the SEA for each environmental topic. A desk-based study for baseline environmental data was undertaken to identify the key environmental characteristics, of which the findings are presented below. The study area has been defined as the Tunbridge Wells Borough Council boundary with considerations of the wider regional context of Kent County and East Sussex County to capture any constraints within proximity to the plan area (as shown in Figure 2-1).

5.2 Landscape and Visual Amenity

5.2.1 Policy context

Natural England has divided England into 159 distinct natural areas known as National Character Areas (NCAs). A combination of factors is used to define each NCA including landscape, biodiversity, geodiversity, history and cultural and economic activity. NCAs are commonly used for informing policy and planning decisions as well as monitoring changes in the landscape (Natural England, 2014).

The National Planning Policy Framework (NPPF) (2024) outlines that the distinctive characters of towns should be reflected in strategic policies, with these policies looking at 10 years ahead to meet the likely scale and type of development that is likely to be required. The NPPF states that planning policies should ensure developments are:

- Visually attractive because of good architecture, layout, and appropriate and effective landscaping.
- Sympathetic to local character and history, while not preventing or discouraging appropriate innovation or change.
- Maintaining a strong sense of place to establish an attractive and welcoming place to live, work and visit.

The NPPF provides guidance on proposals which may affect Green Belt designations. Local planning authorities should plan positively to enhance their beneficial use and any inappropriate development which is harmful to the Green Belt should not be approved except in very special circumstances. Paragraph 143 of the NPPF (2024) defines five purposes that the Green Belt serves. These are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and

- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Furthermore, paragraph 148 states "where it is necessary to released Green Belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other Green Belt locations." Grey belt is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. Local authorities are required to perform a review of their Green Belt to identify grey belt land.

The NPPF (2024) emphasises the contribution trees can make to local character and urban environments. The NPPF outlines guidance on protecting and enhancing valued landscapes. Tree Preservation Orders (TPOs) are orders made by the local planning authority to protect the amenity of specific trees, groups of trees or woodland. This prohibits any destruction or damage to these trees without written consent from TWBC. The law on TPOs is in Part VIII of the Town and County Planning Act 1990 as amended and in the Town and Country Planning (Tree Preservation) (England) Regulations 2012.

5.2.2 Baseline environment

Landscape Designations

A large area of Tunbridge Wells borough falls within the High Weald National Landscape Designation (formerly known as the High Weald Area of Outstanding Natural Beauty), as shown in Figure 5-1. This is a statutory designation of over 1461 square kilometres across the counties of Kent, Sussex and Surrey and is the fourth-largest National Landscape in England and Wales (HWNLP, 2025). It was designated in 1983 and is protected by law to conserve and enhance its natural beauty. This is a medieval landscape of wooded, rolling hills and sandstone outcrops with small farms and ridge-top villages.

The High Weald lies at the core of the Weald anticline, known as the Weald Forest Ridge, with extensive ancient heathland forests located in this area, including the Ashdown, St Leonards, Worth and Dallington Forests. The ridge is covered in 22% ancient woodland, which is a significant proportion in the UK. Towards the edge of the High Weald are the flat clay vales of the Low Weald, Greensand Ridge and the North and South Downs. The River Ouse, Medway and Rother also flow through this area, and have created deep, steep-sided valleys of wet clay that are prominent in the landscape.

The area is also valuable for recreation, with numerous long-distance footpaths crossing through the National Landscape designation and totalling 2063 kilometres. These are the High Weald Landscape Trail, Wealdway, 1066 Country Walk, Saxon Shore Way, Vanguard Way and Sussex Border Path. The Bewl Water reservoir, the largest body of inland water in south-east England, is also a valued tourist attraction and recreation area located within the High Weald.

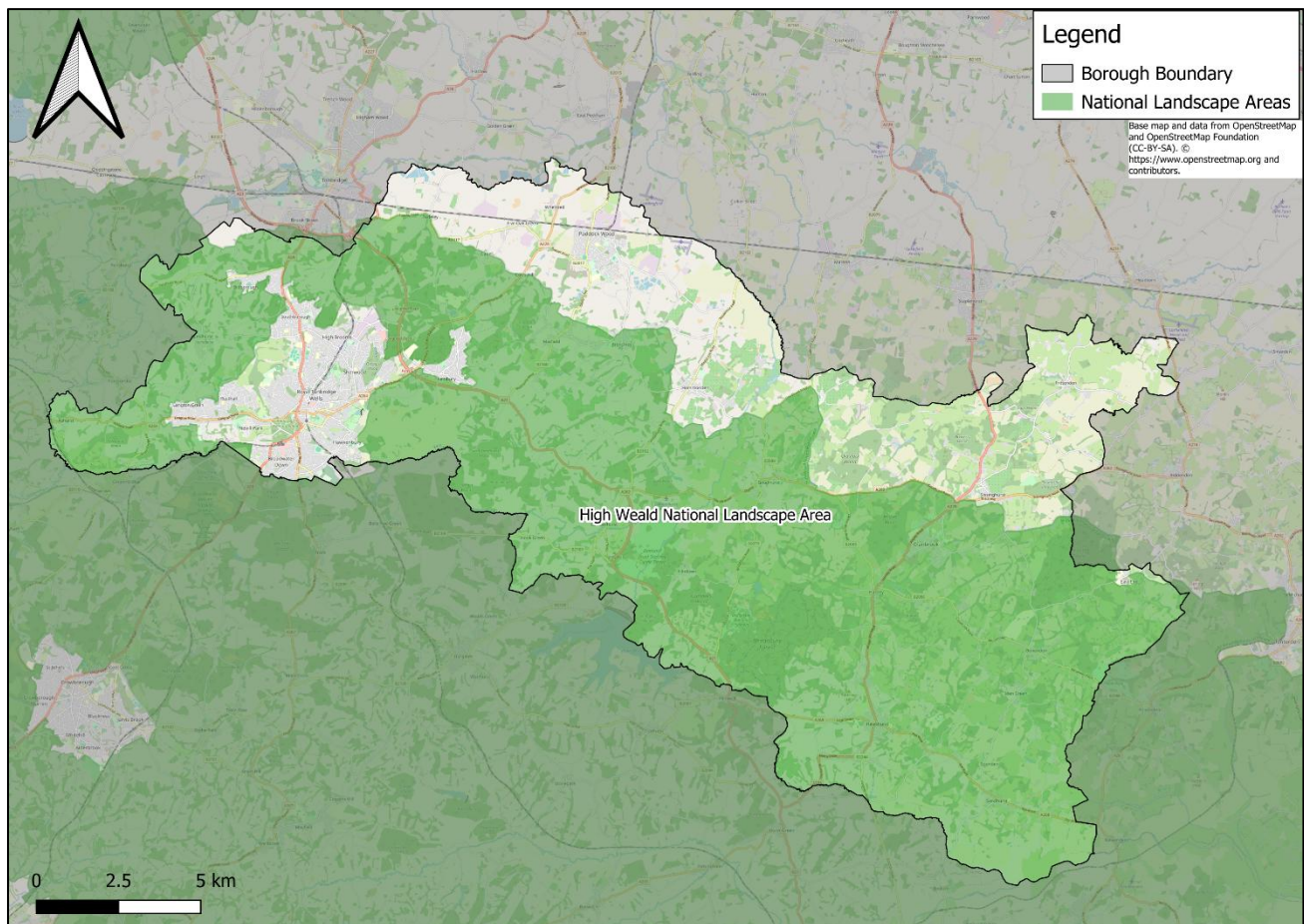


Figure 5-1. National Landscape in Tunbridge Wells Borough.

Landscape Character Areas

As shown in Figure 5-2, much of the borough falls within the High Weald National Character Area (NCA) 122 (Natural England, 2013). This area comprises a ridged and faulted sandstone core of the Kent and Sussex Weald. This is an extensive area of ancient countryside and is considered one of the best surviving examples of a medieval landscape in northern Europe. 78% of this area is covered by the High Weald National Landscape Area (formerly AONB). It consists of fields, small woodlands and farmsteads, connected by historic tracks and paths. Prominent medieval patterns of pasture fields enclosed by thick hedgerows can be seen here. The following characteristics for the National Landscape are stated by Natural England:

- A faulted landform of clays, sand and soft sandstones with outcrops of fissured sandrock and ridges running east-west, deeply incised and intersected with numerous gill streams forming the headwaters of a number of major rivers- the Rother, Brede, Ouse and Medway- which flow in broad valleys.
- High density of extraction pits, quarries and ponds, in a part consequence of diverse geology and highly variable soils over short distances.
- A dispersed settlement pattern of hamlets and scattered farmsteads and medieval ridgetop valleys founded on trade and non-agricultural rural industries,

with a dominance of timber-framed buildings with steep roofs often hipped or half-hipped, and an extremely high survival rate of farm buildings dating from the 17th century or earlier.

- Ancient routeways in the form of ridgetop roads and a dense system of radiating droveways, often narrow, deeply sunken and edged with trees and wild flower-rich verges and boundary banks. Church towers and spires are an important local landmark. There is a dense network of small, narrow and winding lanes, often sunken and enclosed by high hedgerows or woodland strips. The area includes several large towns such as Royal Tunbridge Wells, Crowborough, Battle and Heathfield and is closely bordered by others such as Crawley, East Grinstead, Hastings and Horsham.
- An intimate, hidden and small-scale landscape with glimpses of far reaching views, giving a sense of remoteness and tranquillity yet concealing the highest density of timber-framed buildings anywhere in Europe amidst lanes and paths.
- Strong feeling of remoteness due to very rural, wooded character. A great extent of interconnected ancient woods, steep-sided gill woodlands, wooded heaths and shaws in generally small holdings with extensive archaeology and evidence of long-term management.
- Extensive broadleaved woodland cover with a very high proportion of ancient woodland with high forest, small woods and shaws, plus steep valleys with gill woodland.
- Small and medium-sized irregularly shaped fields enclosed by a network of hedgerows and wooded shaws, predominantly of medieval origin and managed historically as a mosaic of small agricultural holdings typically used for livestock grazing.
- A predominantly grassland agricultural landscape grazed mainly with sheep and some cattle.
- There is a strong influence of the Wealden iron industry which started in Roman times, until coke fuel replaced wood and charcoal. There are features such as a notably high number of small hammer ponds surviving today.
- Ashdown Forest, in contrast to the more intimate green woods and pastures elsewhere, is a high, rolling and open heathland lying on the sandstone ridges to the west of the area.
- An essentially medieval landscape reflected in the patterns of settlement, fields and woodland.
- High-quality vernacular architecture with distinct local variation using local materials. Horsham Slate is used on mainly timber structures and timber-framed barns are a particularly notable Wealden characteristic feature of the High Weald.

Towards the northern boundary of the borough, there are areas that fall within the Low Weald National Character Area 121. This is an area of broad, low-lying clay vale which wraps around the northern area of the High Weald NCA within the borough. This is a

predominantly agricultural area that supports pastoral farming with heavy clay soils, arable soils to the east and some densely wooded areas with ancient woodland.

In the southeastern corner of the borough, there is a small area of Romney Marshes NCA 123 that falls within the Tunbridge Wells borough. This is an open area of reclaimed low-lying marshland. To the south and east it is bounded by the English Channel and to the north an ancient cliff-line. This area contains significant wildlife and geomorphological features that are protected under statutory designations. There are limited transport links and employment opportunities within this NCA, and as a result some higher rates of social and economic deprivation.

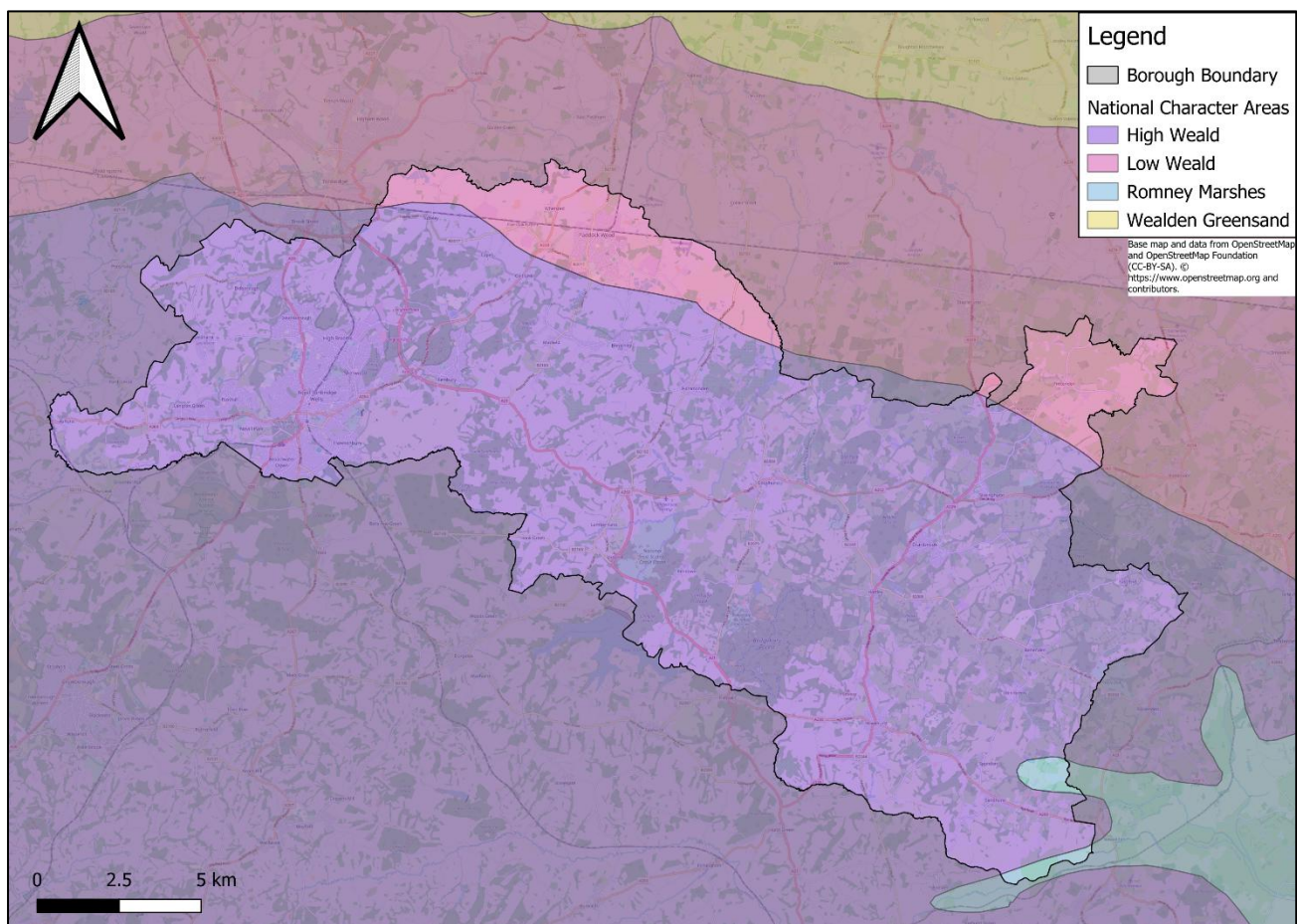


Figure 5-2. National Landscape Character Areas in Tunbridge Wells borough.

Green Belt

Green Belt is an important designation. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belts are their openness and their permanence (NPPF, 2024). The Green Belt serves five purposes, as outlined in the NPPF:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;

- To preserve the settling and special character of historic towns;
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Green Belt in this borough surrounds the metropolitan centre of Royal Tunbridge Wells and covers approximately 21% of the borough area as presented by Figure 5-3. The purpose of the Green Belt here is to maintain openness of the landscape, such as by protecting undeveloped countryside land and avoid merging of settlements. In this case, the designation is classed as Metropolitan Green Belt, which has the purpose of maintaining the openness of landscape and avoiding settlement merging in the area surrounding Greater London.

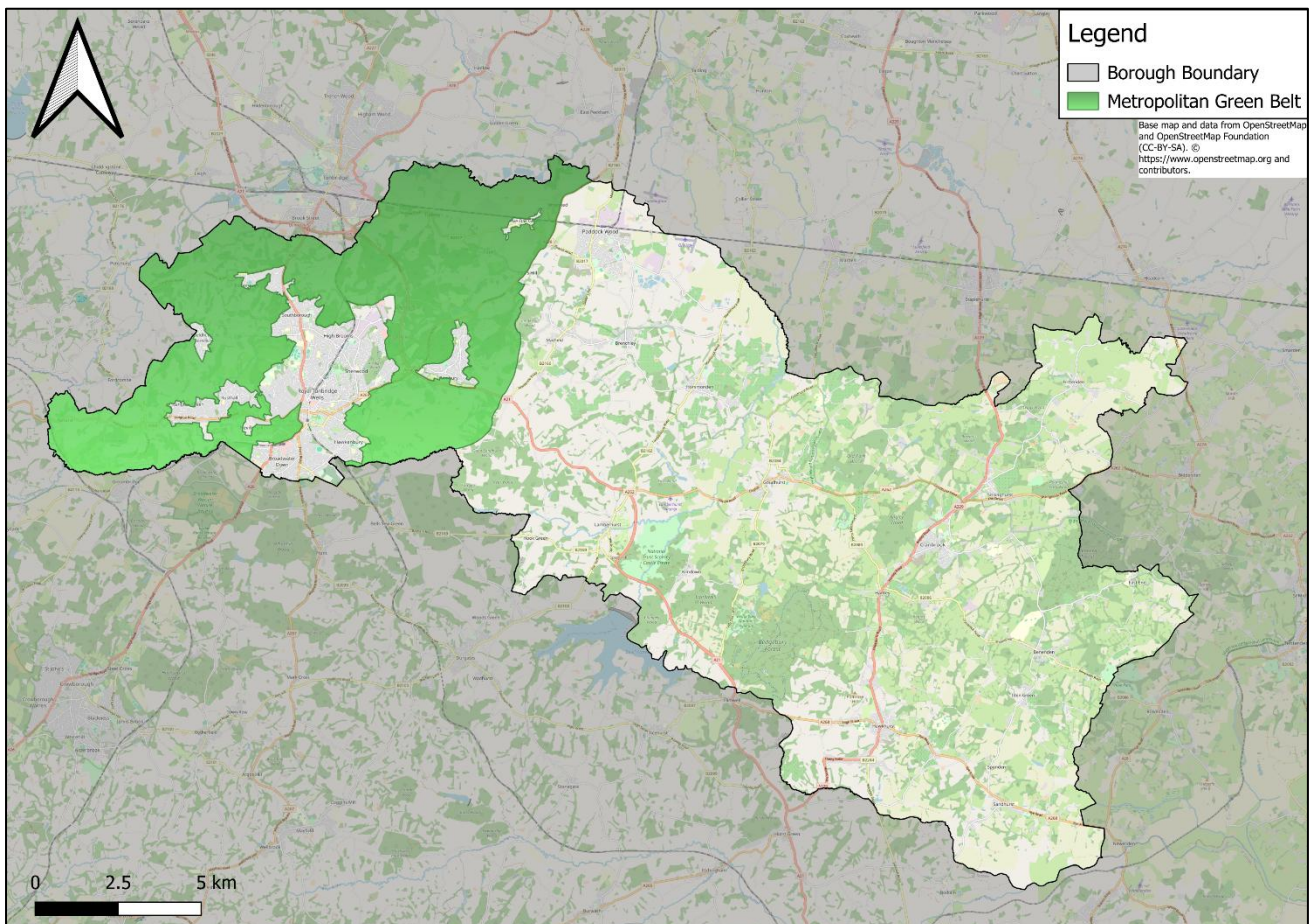


Figure 5-3. Metropolitan Green Belt in Tunbridge Wells borough.

Townscapes

Royal Tunbridge Wells town centre stakeholder and community study comprised a series of engagement events in October and November 2022 to hear local views, including residents and traders, on their experiences as well as the future of Royal Tunbridge Wells town centre. The purpose of this study was to inform the early engagement and development for the Royal Tunbridge Wells Town Centre Plan with community and stakeholder views. Within the study many noted the Spa Town status of Royal Tunbridge Wells as an asset that draws tourists to the town centre, but its full potential is not being realised. The results

of the study indicated that the local priorities for the town centre are to focus on health and wellbeing, induce a peaceful atmosphere in the surrounding environment, such as through blue and green infrastructure, an 'active streetscape', and more emphasis on the heritage assets and the repurposing and enlivening of existing buildings and facades in the town centre.

Paddock Wood is a relatively new settlement when compared to other historic towns of the borough. The Paddock Wood Neighbourhood Plan 2022-2038 suggests that the character of this townscape is generally more modern and changed dramatically post WW2. The town evolved primarily because of the railway, which was once used to support fruit production, livestock farming and the hop industry. There are some original historic buildings that present intricate brick detailing and the Plan outlines that the new development must retain and reflect this style (Paddock Wood Town Council, 2023).

5.2.3 Summary of key issues

69% of the borough is contained within the High Weald National Landscape. It is crucial that any development proposals maintain the character of this national landscape, as well as maintaining and enhancing the characteristics of each townscape within the borough, such as the historic 'Spa Town' characteristics of Royal Tunbridge Wells.

5.3 Biodiversity, flora and fauna

5.3.1 Policy context

Under a number of Acts, national and international statutory protected nature sites in the UK include:

- Special Protection Areas (SPA): protected areas for birds in line with European Council Directive 2009/147/EC on the conservation of wild birds (the Birds Directive) and classified under multiple legislations including the Wildlife and Countryside Act 1981 (as amended);
- Ramsar sites: designated wetlands of international importance;
- Special Areas of Conservation (SAC) are designated to conserve habitats and species listed on the European Council Directive 92/43/EEC (the Habitats Directive). SACs are protected by the Conservation of Habitats and Species Regulations 2017 (as amended); and
- Sites of Special Scientific Interest (SSSI) are afforded protection under the Wildlife and Countryside Act 1981 (as amended). This means that certain activities are prohibited and there are legal duties concerning how these areas should be managed and protected. This includes to intentionally or recklessly damage, disturb, or destroy land known to be an SSSI.

The UK Government published its 25-Year Environment Plan in 2018 (25YEP), which sets out the government's overarching environmental goals relating to biodiversity and nature conservation including achieving a 'growing and resilient network of land, water and sea that is richer in plants and wildlife' (Defra, 2018). The Environmental Improvement Plan, which is the First Revision of the 25 Year Environment Plan, builds on the 25-year plan's vision with a new plan setting out how the government will work with landowners, communities, and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress (Defra, 2023).

The Environment Act (2021) makes many components of the 25-Year Environment Plan statutory through legal requirements to restore natural habitats, increase biodiversity and halt the decline in species by 2030. The Act includes a requirement for all planning permissions granted in England to deliver at least 10% biodiversity net gain from February 2024, with some exceptions (The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024). Paragraph 180 of the NPPF (2025) states that impacts from development on biodiversity should be minimised and opportunities for net gains should be secured where possible. Local wildlife-rich habitats and wider ecological networks should be safeguarded. Planning policies should recognise the wider benefits from natural capital and ecosystem services.

The UK Biodiversity Action Plan (UKBAP) was first published by national government in 1994 in response to the United Nations Convention on Biological Diversity in 1991. The UKBAP has now been superseded by the Section 41 Habitats and Species listed in the Natural Environment and Rural Communities Act (NERC) 2006. The Section 41 list should

be used to guide local authorities and landowners on biodiversity considerations. The Kent Biodiversity Action Plan was published in 1995 and summarises the baseline information for the county's biodiversity and the Plan then addresses the species and habitats under threat leading to the development of an agenda for action.

As part of the government's 25 Year Environment Plan, and underpinned by the Environment Act 2021, Defra and Natural England are bringing together partners, legislation and funding to create the Nature Recovery Network (NRN) to restore and enhance England's wildlife-rich places. The Secretary of State for Environment, Food and Rural Affairs has appointed 48 responsible authorities to lead on preparing a local nature recovery strategy for their area. Together these 48 strategy areas cover the whole of England and will be aimed at helping people to see where action to recover nature in their area would be most effective.

Kent County Council (KCC) has prepared the Kent and Medway Local Nature Recovery Strategy on behalf of Defra as Responsible Authority and this was published in November 2025. The strategy sets out county priorities for nature recovery and recommends actions for delivery. Local Nature Recovery Strategies are required to be updated every 3 to 10 years under government guidance, to ensure there is updated information available on what has been achieved and what still is to be addressed.

5.3.2 Baseline environment

Internationally and nationally designated nature conservation sites

There are no internationally designated nature conservation sites within the Tunbridge Wells borough. The closest is the Ashdown Forest SPA and SAC, approximately 5km southwest of the borough boundary, presented in Figure 5-4. This site due to being one of the largest single continuous areas of lowland heath in the southeast of England, having both European dry heaths and a large proportion of Northern Atlantic wet heaths on site. The site supports beetles, dragonflies, damselflies and butterflies. As well as this, there are birds of European importance on site, such as the European nightjar, Dartford warbler and Eurasian hobby.

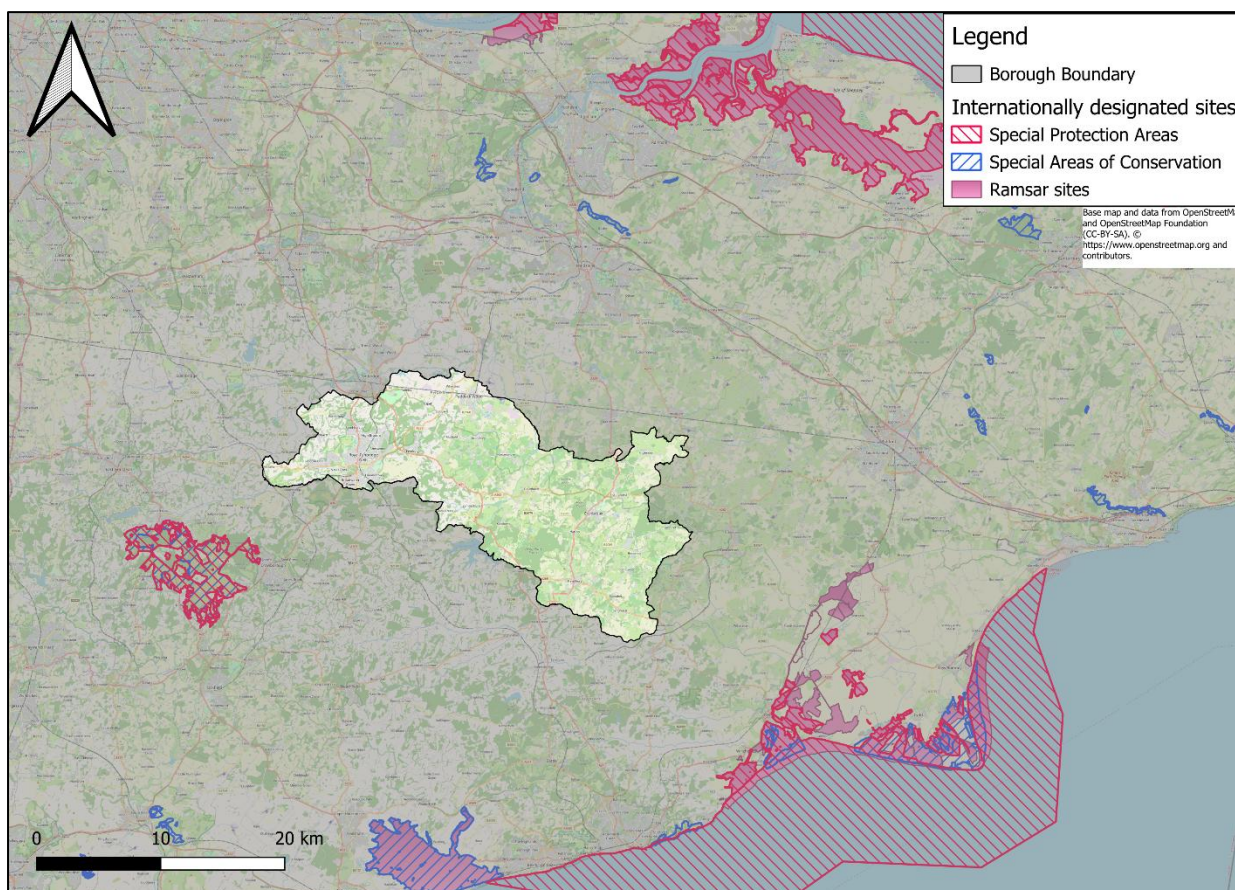


Figure 5-4. Internationally designated sites in South East England.

There are 10 nationally designated nature conservation sites within the Tunbridge Wells borough, all of which are SSSIs and statutory designations under the Wildlife and Countryside Act 1981.

Summary details of the statutory designated nature conservation sites within the borough are provided in Table 5-1. The locations of these sites are presented in Figure 5-5.

Table 5-1. Sites of statutory designation for nature conservation in the Tunbridge Wells borough (Natural England).

Site	Reason for designation
Brookland Wood SSSI	Special interest on the site stems from its variety of woodland types, particularly an area of alder <i>Alnus glutinosa</i> that dominates wet areas. Hazel, ash and field map dominates drier areas. There are small streams with a variety of mosses and liverworts.
Combwell Wood SSSI	This is an area of ancient woodland on sandstone, with deep-stream valleys where peat has accumulated that contain several uncommon <i>Atlantic bryophytes</i> (mosses and liverworts) as well as two rare water beetles <i>Coleoptera</i> . This site falls within the High Wealds National Landscape.

Site	Reason for designation
Robins Wood SSSI	This site is a deep valley along a stream in the Weald and has humid conditions that are typical of this area. There are a diverse mix of mosses, ferns and liverworts and woodland which dates back to recolonisation of the landscape after the end of the last ice age, around 11,700 years ago.
Sissinghurst Park Wood SSSI	This woodland consists predominantly of sweet chestnut <i>Castanea sativa</i> coppice. The value within the site comes from the rare number of plants found within its rides, and this site is the most eastern locality in Britain that has presence of the ivy-leaved bellflower <i>Wahlenbergia heracea</i> .
Parsonage Wood SSSI	The site is an example of woodland ghyll in the High Weald National Landscape. The woodland is predominantly hornbeam, sweet chestnut and ash coppice with a rich ground flora dominated by brambles and bluebells. There is a damp stream within the site that supports many species of ferns, moss and liverwort, some of which are rare species in eastern Britain. The site is managed by the Kent Wildlife Trust who aim to restore the natural spaces across Kent.
Scotney Castle SSSI	This site has a mix of parkland, grassland and woodland. There are dormice present on the site, which are a protected species, and several nationally rare invertebrates such as Rolph's door snail. The site also contains a man-made pond and a moat and is a National Trust site.
Southborough Pit SSSI	The site is a pit in the lower Hastings Bed Group. The site dates to the Valanginian age, around 140 million years ago in the Lower Cretaceous. It is the type locality for the High Brooms Soil Bed, which contains the aquatic horsetail <i>Equisetes lyellii</i> . The site is designated for its geological value and was included within the Geological Conservation Review.
Pembury Cutting and Pit SSSI	This site exposes rocks of the Tunbridge Wells Sand Formation that date to the Early Cretaceous period around 100 to 140 million years ago. There are many fossils on the site, particularly of the extinct plant <i>Lycopodites</i> . The site is designated for its geological value and was included within the Geological Conservation Review.
Rusthall Commons SSSI	This is a site that is important due to its Quaternary examples of sandstone weathering, particularly Toad Rock, which stands on a narrow base moulded by periglacial wind erosion. The site is

Site	Reason for designation
	designated for its geological value and was included within the Geological Conservation Review.
High Rocks SSSI	This is a Pleistocene site, described as a key geomorphological site for sandstone weathering features developed on the highest cliffs of the Weald. There is Ardingly Sandstone that has micro-cracking of unknown origin. The site is designated for its geological value and was included within the Geological Conservation Review.

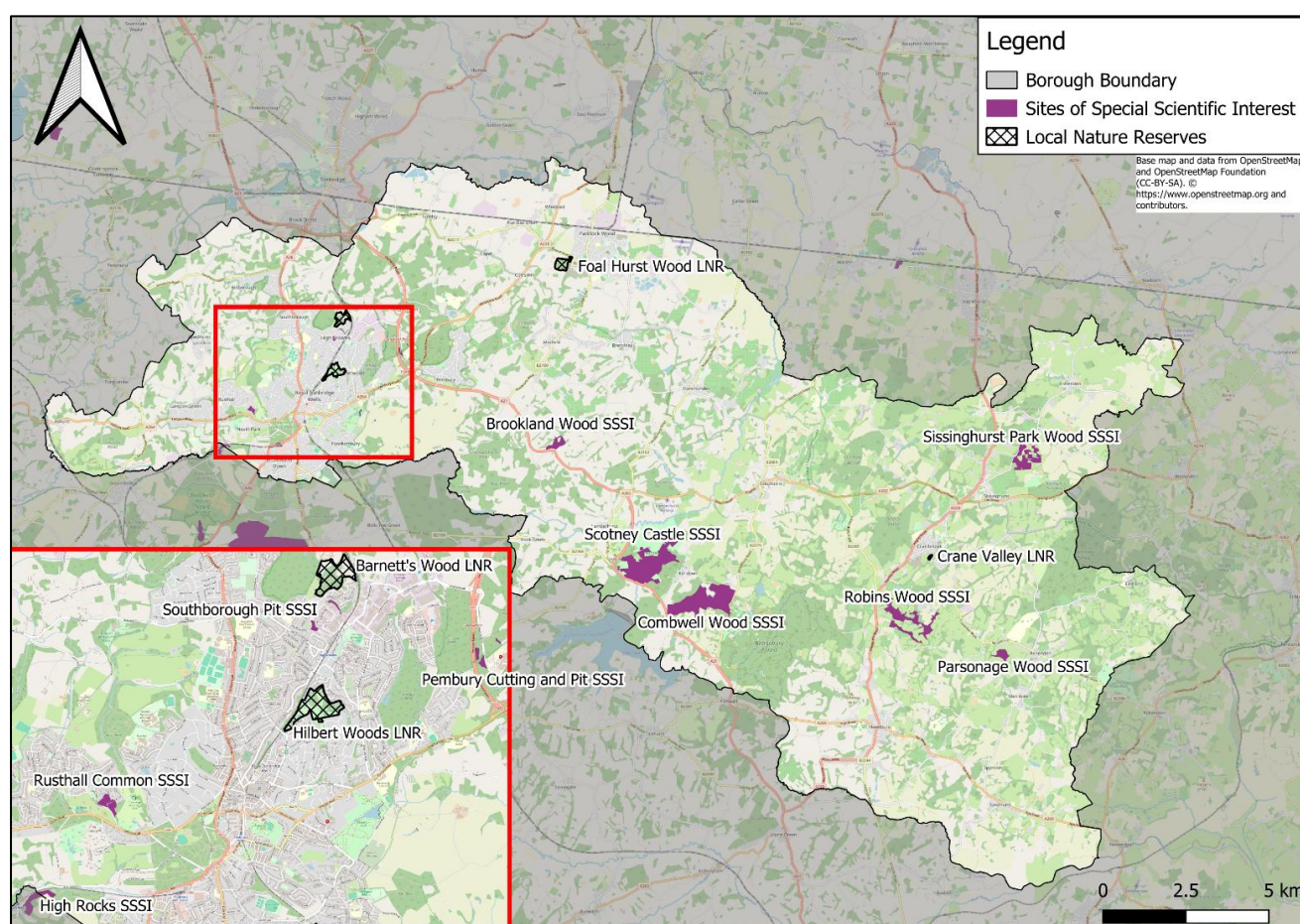


Figure 5-5. Designated sites for biodiversity and nature in Tunbridge Wells borough.

Locally designated nature conservation sites

The borough also contains four Local Nature Reserves (LNR). These are declared and managed by district and county councils under the National Parks and Access to the Countryside Act 1949 due to their biological, geological, educational and public interest importance.

Summary details of the LNRs within Tunbridge Wells are presented in Table 5-2. The location of LNRs within the borough is presented in Figure 5-5.

Table 5-2. LNRs within the Tunbridge Wells borough.

Site	Site Features
Foal Hurst Wood LNR	The site is comprised of ancient woodland and meadows. There are bird species such woodpeckers, blackcaps, chiffchaff and sparrowhawk and more that total over 40 species of birds. In the spring the reserve has primroses, orchards, bluebells and in summer there is dog rose and honeysuckle. In autumn there are many types of fungi.
Barnetts Wood LNR	This reserve is a well maintained semi-natural broadleaf ancient woodland, wildflower meadow and pond. The woodlands here are typical of the High Weald and include oak and birch woodland, remnant wood pastures and wet woodland. There are also bluebells in the area and a range of wildflowers in the grasslands.
Crane Valley LNR	This is a small site of only 1.5 hectares and has woodland, wet meadow, a stream and scrubs. The northeast section of the site contains a small area of mixed semi-natural woodland that contains many tree species such as English oaks and hornbeams as well as ash, hazel and willow close to the stream. The site supports a rare wildflower species, bitter cress. There are also rare long-horn bees on the site.
Hilbert Woods LNR	The woods contain both semi natural and wet woodland areas, located on a gentle incline above a small stream. There are many species of trees on the site including oak, hazel and a small number of Beech on dryer slopes. Alder is found on the lower damp slopes, and these line wet flushes that sometimes appear throughout the year. There is also a stream on the site and surrounding wet areas support local and nationally scarce species of insect fauna.

Notable habitat and species

The Kent Biodiversity Action Plan was first launched by KCC in 1997 soon after the UKBAP was published. A full review of the Kent BAP was then undertaken in 2005.

The Kent Nature Partnership (KNP) Biodiversity Strategy 2020-2045 aims to deliver the maintenance, restoration and creation of thriving habitat and species within the county. The strategy highlights some areas of concern that have historically had a negative impact on natural diversity in Kent. One of the most significant is the direct loss of habitats through

development and urbanisation, and with the standard method housing need indicating 1,100 new homes are required per annum in Tunbridge Wells, it is likely that biodiversity in the area is going to come under threat.

KNP's 2023 biodiversity strategy identified priority species and habitats found in Kent.

Priority habitats are as follows:

- Lowland meadow
- Lowland Beech and Yew Woodland
- Lowland Mixed Broadleaves Woodland
- Hedgerows
- Lowland dry acid grassland / Lowland heathland
- Brownfield
- Ponds
- Traditional orchard
- Wet woodland
- Intertidal chalk and subtidal chalk (nominated)
- Rivers
- Intertidal mudflats and coastal saltmarsh
- Coastal and floodplain grazing marsh
- Chalk grassland
- Vegetated shingle
- Subtidal mud (nominated)
- Chalk streams

Priority and indicator species identified by the KNP area:

- Shrill carder bee
- Turtle dove
- Swift
- Nightingale
- Water vole
- Dwarf or Kentish Milkwort
- Adder
- European eel
- Adonis blue
- Heath fritillary
- True Fox-sedge
- Lady orchid
- Serotine bat
- Sandwich tern
- Lapwing
- Common blue

- Hedgehog
- Harbour and Grey seals

Within the borough, Tunbridge Wells Biodiversity Action Plan, produced in 2008, identified the priority habitats in the borough to help those involved in the planning process. These include lowland dry acid grassland, lowland heath, lowland woodland pasture, historic parkland, and rocky outcrops which were all found in Rusthall and Tunbridge Wells Common. More recently, priority habitats were identified in the Priority Habitat Inventory (Natural England, 2023) and are outlined for the borough in Figure 5-6.

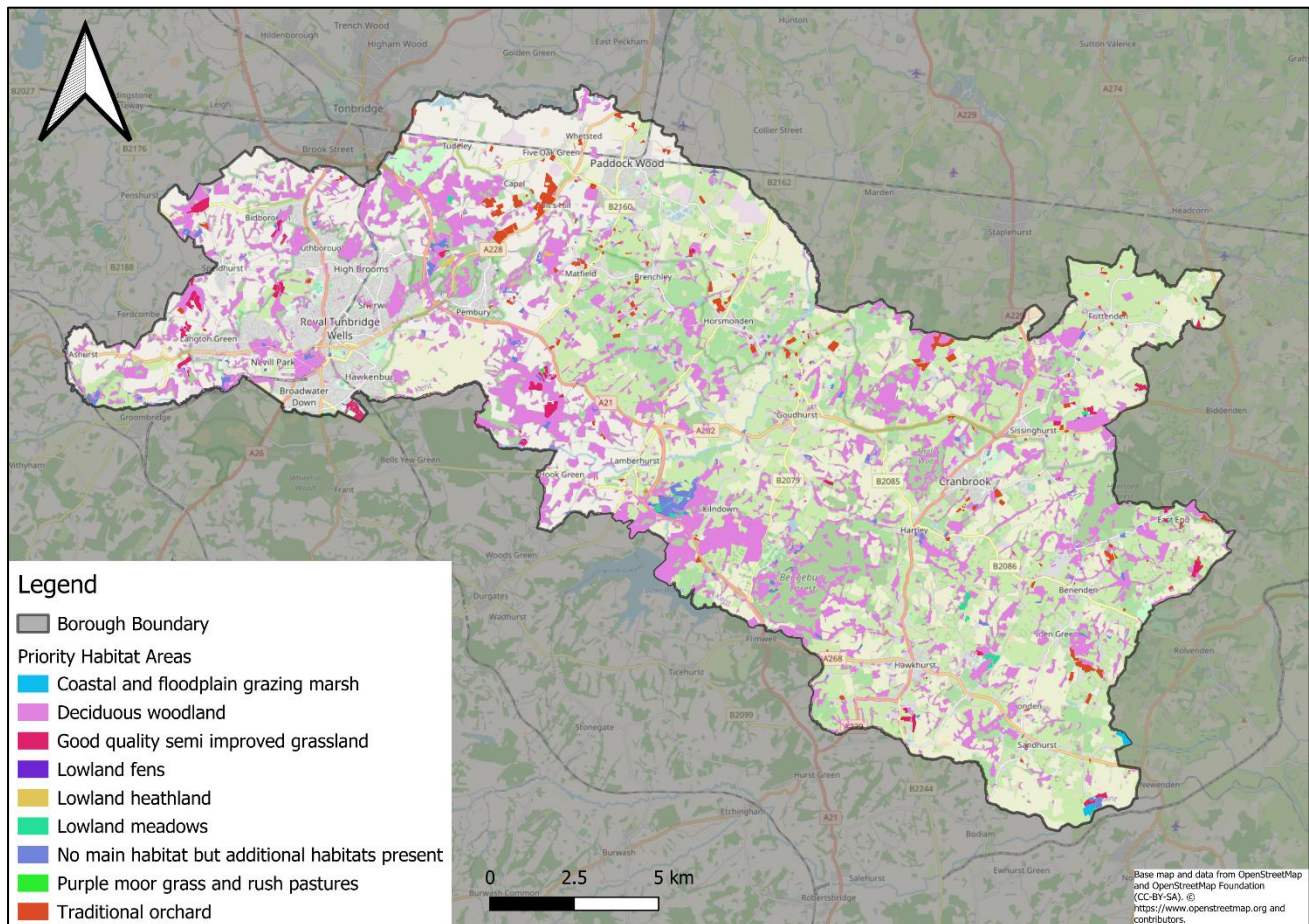


Figure 5-6. Priority Habitat Areas in Tunbridge Wells borough.

5.3.3 Summary of key issues

There is a growing requirement within national policy and guidance documents to reverse the trend of ecological decline. To maintain and improve existing habitats, species, and ecologically designated sites, and contribute to nature recovery, the Local Plan Review must consider all the challenges facing the environment and biodiversity as outlined above. These include:

- Sensitive designated sites for nature conservation, including priority habitats and species, which are at an increased risk of loss from new development;
- Isolation and fragmentation of open spaces and gardens;

- Habitat connectivity threatened by development; and
- Pollution and climate change.

The decline of natural capital assets contained within the borough should be recognised, as they provide valuable ecosystem services to the region that are essential for social and environmental wellbeing. These assets should be enhanced and maintained through developer contributions to Biodiversity Net Gain, and the specific borough requirements of this should be outlined within the Local Plan Review policies.

5.4 Water environment

5.4.1 Policy context

The UK Government's 25-Year Environment Plan (25YEP) (2018) outlines goals for clean and plentiful water and to reduce risks of harm from environmental hazards. This is supported by the Environment Act (2021) which outlines a legal duty for water companies that discharge sewers into rivers, waterways and coastlines to secure a progressive reduction in the adverse impacts of discharge from storm overflows. Additional interim targets have been created in the Environmental Improvement Plan (2023) to help meet the long-term targets set out in the 25YEP.

The Environment Agency, as the environmental regulator of the water industry in England, regulates and works in partnership with water companies to ensure the nation has resilient and sustainable water supplies the future. Meeting our future needs: a national framework for water resources (EA, 2020) is a national framework to set out a strategic direction for work being carried out by regional water resource groups to outline approaches to meeting likely pressures on water resources.

KCC, as the Lead Local Flood Authority (LLFA) for Kent, published the Kent Local Flood Risk Management Strategy (LFRMS) for the period 2024-2034 (KCC, 2024). The LFRMS sets out the flood risk in the county and aims and objectives for the LFRMS period. The Strategy aims to "improve the safety and wellbeing of Kent's residents and the economy of Kent through appropriate local flood risk management," by "working effectively with communities and partners, incorporate climate adaptation, and utilise natural processes to provide multiple benefits, where possible," (KCC, 2024).

South East Water provide water to the Tunbridge Wells borough and surrounding area and published a Water Resource Management Plan (WRMP) covering the period of 2025-2075, to outline how they plan to resource water under challenges of population growth, climate change and times of threat to the natural environment. The WRMP outlines that there is to be an expected increase to the population in this area of 23% by 2050, and when combined with the changing climate predictions for this period it is likely that water resources could be threatened unless properly addressed. The Plan states a number of objectives that should be achieved to improve water availability and resource management, including leak reduction and water efficiency activities as well as new smart meters installation and

pipelines and reservoirs to be created. South East Water are currently in the process of preparing an updated WRMP.

5.4.2 Baseline environment

Flood Risk

The TWBC Strategic Flood Risk Assessment (SFRA) (Level 1 and Level 2), produced in 2019 but to be updated as part of the Local Plan Review process, states that the key watercourses in the borough are the River Medway and its tributaries, including the River Teise, Southborough Stream, Greggs Wood Stream, and Paddock Wood Stream. Other watercourses in the borough, which are not tributaries of the Medway, are the River Rother and Kent Ditch. Fluvial flood risk within the borough stems from the Medway and its tributaries (JBA Consulting, 2019).

The Environment Agency's historic flood maps show that there has been notable flooding through the central stretch of the borough, roughly surrounding the River Teise from north to south. This avoids the larger borough settlements but does encompass Lamberhurst. This is presented in Figure 5-7. Notable historic flood events have occurred in 1960, 1963, 1968, 1985, 2000 and 2009 in the north of the borough, due to heavy, prolonged rainfall. Since then, there has also been flooding during Winter 2013/14 and August 2015, which included flooding from the River Medway. Details of the significant flood events affecting the borough are outlined in Table 5-3. Records suggest that historically, flood events in the borough have stemmed from heavy rainfall overloading carriageways and drains, but also some records indicate that flooding has occurred due to blocked drains, gullies and run-off from agricultural land (JBA Consulting, 2019).

Table 5-3. Significant historical flood events in Tunbridge Wells borough.

Date	Source of flood	Location	Cause
November 1960	River Medway, Teise and Beult.	Five Oak Green, Lamberhurst, Buckhurst, Ashurst and Ashour Wood.	Heavy and prolonged rainfall.
November 1963	River Medway, Teise and Beult.	Tudeley Hale and Whetsted.	Exceeding channel capacities.
September 1968	River Medway.	Ashurst, Ashour Wood, Tudeley Hale and areas of Paddock Wood.	Exceeding channel capacity due to prolonged heavy rainfall associated with a slow-moving depression and thunderstorms. 150-200mm of rainfall within two days.
December 1985	River Medway and Teise.	Paddock Wood and Five Oak Greens	Heavy rainfall over a prolonged period.
October 2000	River Medway, Teise and Beult.	Tudeley Hale and Paddock Wood. Specifically, properties	Rivers bursting banks and exceeding channel capacities. Culvert

Date	Source of flood	Location	Cause
		on 'The Cedars' which received flooding of 0.1m depth. Mascalls Court Farm and properties in Lamberhurst.	blockages and 'The Cedars' road and railway crossing locations.
December 2013	River Medway.	Horsmonden, Goudhurst and Lamberhurst.	Atlantic depressions bringing heavy rainfall and storm conditions.
August 2015	Flash flood	The Pantiles and River Grom, London Road and Castle Street, and Mount Pleasant Road and railway station.	Localised heavy summer storm event. Flash flooding due to 40mm of rain within an hour.
July 2017	Flash flood	Royal Victoria Palace, High Brooms and the Pantiles.	Short summer rainfall event, causing flash flooding. 32mm of rainfall within 45 minutes, and 22mm of rainfall within 15 minutes.
July 2018	Flash flood	The Pantiles, Mount Pleasant Road.	Surface water and sewer flooding due to heavy summer thunderstorm event.

The EA's Flood Risk Map for Planning presents data that closely aligns with the historic flood risk data. Royal Tunbridge Wells is predominantly within Flood Zone 1, except from a small area of Flood Zone 2 and even smaller area of Zone 3 surrounding the Pantiles. The area of the borough most clearly at risk is Paddock Wood, where there is Flood Zones 2 and 3 to the north and south of the railway line and surrounding the River Medway tributaries heading south into the borough, such as Tudeley Brook.

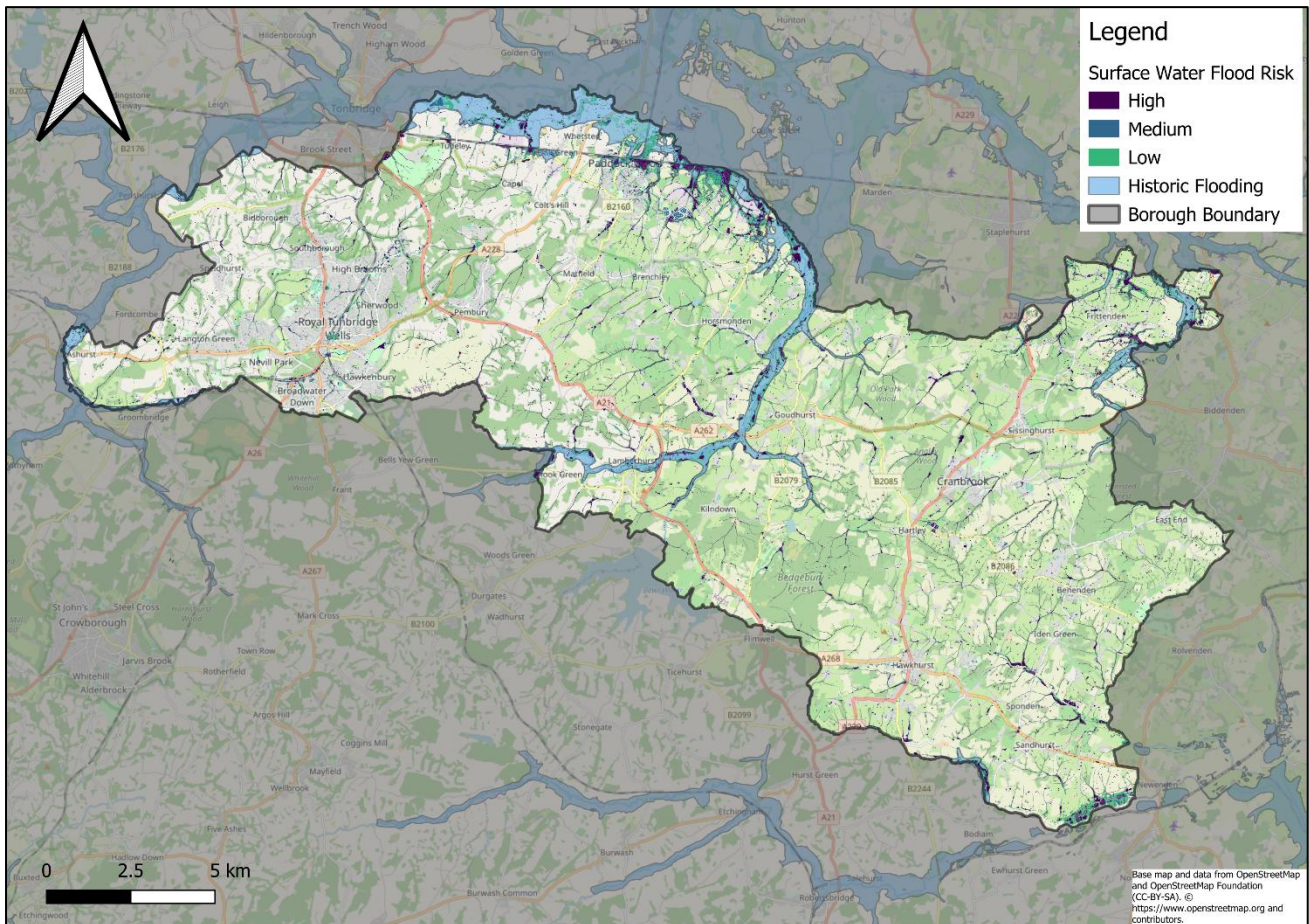


Figure 5-7. Surface Water Flood Risk and Historic Flooding in Tunbridge Wells borough.

Surface water flood risk data, presented in Figure 5-7, suggests that the greatest risk of flooding from surface water is in the north of the borough, in Paddock Wood and surrounding area, as well as land surrounding the South Eastern Main Line. The historic flood events of flash flooding in the borough surrounding The Pantiles and High Brooms can also be understood by reviewing this data, as the area is densely covered in surface water flooding risk at these locations.

A new SFRA is being produced to inform the Local Plan Review and the findings will inform the development strategy and policies within the emerging plan.

Water Resources and Management

South East Water is responsible for supplying water to the borough and wider areas. It recently released a Revised Water Resources Management Plan (2025-2075) (South East Water, 2023). Tunbridge Wells is located within Water Resource Zone 27 and is located within a South East Water supply area. Broadly, Tunbridge Wells is located within the Sussex region which is expected to be in a deficit of water supply by 2030.

South East Water identified challenges for water resource planning in the South East as population growth, protection of the environment, dry weather and drought resilience, and climate change. In the 5 year period since the previous publication in 2019, South East

Water began taking an altered approach to water resource planning, and during this time South East water progressed four key areas of behavioural changes initiatives, free-water saving devices for customers, partnership and community campaigns and communications campaigns. Many initiatives are planned to continue from 2025 onwards, including programmes of Water Efficiency Audits and Water Butt Campaigns. Water leakage targets are also continuously met, and leakage recovery plans are implemented long term.

The plan sets out to achieve the following in the 2025-2040 period (South East Water, 2024):

- Leak reduction and water efficiency activities, saving an additional 34 million litres of water a day across the South East Water area,
- A new smart meter installation programme, with the goal of providing smart metres across 90% of households.
- Reduce non-household consumption with measures such as business smart meters and water efficiency audits.
- New pipelines to increase the amount of water moving between water companies and within the supply area.
- A new reservoir at Broad Oak, Kent by 2033 to provide an additional 22 million litres of water a day.
- A new groundwater source in Maidstone.
- Sub-zonal schemes to improve network connectivity at a local level and allow reduction of abstraction that could impact the environment.
- Further development work and feasibility studies for more new schemes.

The borough has experienced a number of water outages in recent times, as a result of treatment works failure and numerous extreme weather events.

One of the most notable incidents occurred in November 2025, when there was a major water supply failure at the Pembury water treatment works in the borough. Approximately 24,000 households supplied by South East Water were left without clean water for 11 days, with five of those days having no water at all. This highlights the vulnerability of the water resource management system in the area, which can have devastating impacts if one point in the water supply chain has failed. On December 3rd 2025, a 'boil water notice' was issued by South East Water for the affected properties, which advised users to boil tap water before consumption, cooking or washing dishes to ensure it was safe for consumption. This notice was lifted on 12th December 2025, after residents had been left without safe water for 13 days.

Another significant incident occurred during January 2026, when freezing winter temperatures during Storm Goretti left around 30,000 properties with no water. Again in May 2026, water supply failed in the South East Water region. This was during the summer, and a period of hot weather that left around 22,000 properties without water at the peak.

Water Quality

The Water Framework Directive (WFD), Directive 2000/60/EC, has established a framework for European water bodies to be monitored and aims to achieve a good ecological and chemical status by 2015, derogated to 2027 for underachieving water bodies. The borough of Tunbridge Wells falls mostly within the Thames river basin district, but the south east of the borough falls within the South East river basin district, specifically the Rother management catchment.

The Thames river basin district is managed by the Thames River Basin Management Plan (RBMP) (Environment Agency, 2022a). The South East river basin district is managed by the South East RBMP (Environment Agency, 2022b). 17 water bodies fall within the borough of Tunbridge Well, across these two river basin districts.

Due to a change in method for 2019 assessments, all water bodies had a 'Fail' chemical status, and the assessment was therefore not comparable to previous years. In 2022, the chemical status for all water bodies was 'does not required assessment'. Therefore, chemical status has not been included in Table 5-4. A number of waterbodies are designated as heavily modified water bodies (HMWB) and therefore cannot be designated as having 'good status', but instead aims to achieve an alternative of having 'good ecological potential' (GEP).

Table 5-4. Summary of 2022 WFD status of water bodies wwithin Tunbridge Wells borough.

Water body	River Basin District	Operational Catchment	Ecological status/GEP	Hydro-morphological designation	Status change since 2019
Tributary of Beult at Frittenden	Thames	Beult	Heavily modified	Heavily modified	No change
Hammer Stream	Thames	Beult	Heavily modified	Heavily modified	No change
Lower Teise	Thames	Teise	Poor	Not designated artifical or heavily modified	No change
Upper Teise	Thames	Teise	Moderate	Heavily modified	No change
Teise and Lesser Teise	Thames	Teise	Moderate	Heavily modified	No change
Tributary of Teise at Bedgebury	Thames	Teise	Moderate	Not designated artifical or heavily modified	No change

Water body	River Basin District	Operational Catchment	Ecological status/GEP	Hydro-morphological designation	Status change since 2019
Teise at Lamberhurst	Thames	Teise	Poor	Heavily modified	No change
Bewl	Thames	Teise	Good	Heavily modified	Improved
Mid Medway from Eden Confluence to Yalding Water Body	Thames	Medway Middle	Moderate	Heavily modified	No change
Tudeley Brook	Thames	Medway Middle	Moderate	Not designated artificial or heavily modified	No change
Alder Stream and Hammer Dyke	Thames	Medway Middle	Moderate	Heavily modified	No change
Somerhill Stream	Thames	Medway Middle	Poor	Not designated artificial or heavily modified	Improved
Bardel Mill Stream	Thames	Medway Upper	Moderate	Not designated artificial or heavily modified	No change
Grom	Thames	Medway Upper	Moderate	Not designated artificial or heavily modified	No change
Upper Newmill Channel	South East	Rother Levels	Moderate	Not designated artificial or heavily modified	No change

Water body	River Basin District	Operational Catchment	Ecological status/GEP	Hydro-morphological designation	Status change since 2019
Tributary of Newmill Channel upstream of Rolvenden	South East	Rother Levels	Moderate	Not designated artificial or heavily modified	No change
Hexden Channel	South East	Rother Levels	Poor	Not designated artificial or heavily modified	No change

Bewl Water Reservoir, the largest body of water in south east England, falls partly within the borough as well as neighbouring districts of Rother and Wealden, and is shown in Table 5-4. This body of water is a key source of drinking water for East Sussex and Kent, with a capacity for more than 31,000 million litres of water. This is enough to provide an average day of water usage to nearly 2 million people. The site also acts as an important recreational open space, with walking and cycling routes around the reservoir, and opportunities for fishing, sailing, kayaking on the reservoir itself (Water for Life, 2024).

Groundwater

Tunbridge Wells borough is predominantly covered by Secondary A Aquifer Designations for its bedrock. These areas are underlain with soils that can support water supplies at a local scale and supply baseflow to rivers. There are, however, no areas of Principle Bedrock aquifers, and these areas are important rock units with higher permeability and capacity for water storage. This can contribute to water resource concerns.

There are some areas within the borough that fall within Source Protection Zones (SPZ), as shown in Figure 5-8. These are designated areas to protect important sources of groundwater from contaminating activities, due to the lack of permeable geology and aquifers in the area.

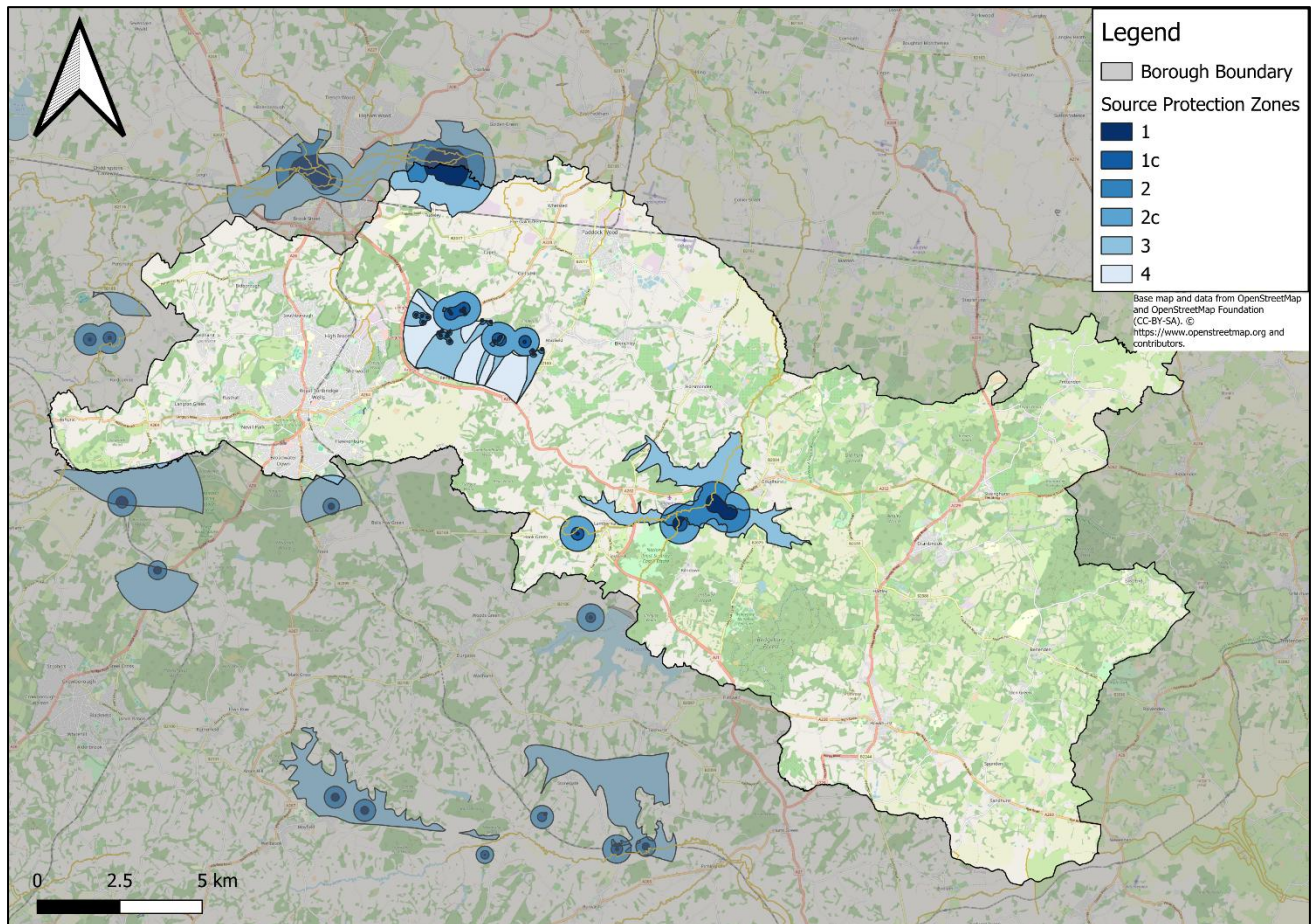


Figure 5-8. Source Protection Zones within the Tunbridge Wells borough.

5.4.3 Summary of key issues

The borough is vulnerable to flash flooding and flooding from rivers in the north of the borough, predominantly from the River Medway. Proposed developments should consider vulnerability to flooding, and potential contributions to increasing surface water runoff.

Water resourcing is also expected to become a concern for the borough. It is expected that there will be a deficit of supply for the region by 2030, and the stresses that a lack of supply can have on the region were highlighted by the 2025 water crisis across the borough. It is necessary that there are approaches in place to avoid another failure of water supply to the region.

The majority of WFD waterbodies within the borough as designated as heavily modified. This limits their ability to receive good ecological status. Regardless of this limitation, only one water body in the borough receives good ecological potential, and none of the natural water bodies receive good ecological status. There is a clear need to improve water quality of the WFD water bodies in Tunbridge Wells to improve their ecological potential.

5.5 Land and contamination

The Environmental Protection Act 1990 defines the fundamental structure and authority for control of emissions into the environment. Part IIA of this act provides a legislative context for the assessment of contaminated land. Development of land will have to take Part IIA into account as a change in the use of land may bring about changes that redefine the development inside the statutory definition of contaminated land by creating pollution linkage. Contaminated Land (England) Regulations 2006 sets out the provisions relating to the identification and remediation of contaminated land under the Environmental Protection Act 1990.

Defra produced contaminated land statutory guidance in 2012 which explains how local authorities should implement the regime on contaminated land, and how local authorities should go about deciding whether land is contaminated land in the legal sense of the term (Defra, 2012).

Chapter 11 of the NPPF places emphasis on plans making effective use of land which includes prioritising brownfield sites to make use of suitable brownfields sites or underutilised land. Brownfield sites are previously developed "Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed)" (Annex 2: Glossary, NPPF, 2024). Development of brownfield land or land at risk of contamination could result in the release of contaminants into groundwater or surface waters. Any development on contaminated land should adequately deal with the contamination risk as to prevent harm to human health, property and the environment.

The NPPF (2024) provides guidance for ground conditions and pollution, outlining in paragraph 196 that planning policies and decisions should ensure that a site is 'suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination' including effects of pollution on health, living conditions and the natural environment. The NPPF also outlines that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality should be preferred (footnote 72 in Chapter 15 of the NPPF).

Planning Practice Guidance 'Land affected by contamination' (2019) sets out how policies outlined within the NPPF are expected to be applied. This guidance and the need to adequately consider contaminated risks is echoed within many of the plan policies for each of the local planning authorities.

Safeguarding our Soils: A Strategy for England promotes soil as a natural resource that provides essential services, including food production, water management and support for valuable biodiversity and ecosystems. As a large store of carbon, it also plays a vital role in the fight against climate change (Defra, 2009).

The NPPF (2024) also outlines the importance of preserving agricultural land, suggesting that LPAs should consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land for development. The Agricultural Land Classification

(ALC) provisional data outlines the agricultural potential of land, categorising it into five grades (Natural England, 2020). The best and most versatile land is defined as Grade 1 (excellent quality agricultural land), with Grade 2 (very good quality), 3 (broken into subgrade 3a: good and 3b: moderate). Grade 4 and 5 land is considered to be of poor and very poor quality. Any development proposals likely to result in the loss of 20ha or more of BMV soils must consult Natural England. Planning Practice Guidance for the Natural Environment outlines that brownfield land can also be valuable for biodiversity, and in some cases should be preserved from development. When allocating land for development or determining a planning application, the unique biodiversity of that site and its environmental sensitivity should be taken into account on a case by case basis, so that harm can be avoided, mitigated or compensated (Gov UK, 2025).

Defra published the Land use Framework for England in 2026. The purpose of this document is to set out how to use land more effectively, to support a thriving natural environment and resilience to a changing climate. The document outlines four land use principles to inform decision-making, and suggests that:

- Land use should be planned and managed to deliver greater benefits across a range of outcomes.
- Land should be used in ways that aligns with local context.
- Land use decisions should take a long-term view, taking account of the best available evidence.
- Land use policy and delivery should be flexible and evolve and respond to change.

This Framework should be considered throughout the development of the Local Plan Review, with principles taken into account when developing spatial allocations.

5.5.1 Baseline environment

Soils and geology

The borough bedrock is predominantly underlain with Tunbridge Wells Sand Formation (sandstone and siltstone), mixed with areas of Wadhurst Clay Formation (mudstone) and Ashdown Formation (sandstone and siltstone). A central strip of Lower Tunbridge Wells Sand (sandstone, siltstone and mudstone) and Ardingly Sandstone Member (sandstone) runs horizontally through the centre of Royal Tunbridge Wells, mixed with some areas of Grinstead Clay Member (mudstone).

There are very minimal superficial deposits in the borough. The only exception is alluvium-clay, silt, sand and gravel areas which are fluvial in origin. There are also some minimal areas of Head-Clay, silt sand and gravel that are subaerial in origin.

A number of SSSI have been designated in the borough due to their geological importance. These are the Southborough Pit, Pembury Cutting and Pit, Rusthall Commons and High Rocks. Further details can be found in Section 5.3.2 and Table 5-1.

Waste management and contaminated land

From 2024 to 2025, TWBC collected 41,570 tonnes of household waste. Recycling has increased in the borough, with 52.5% of household waste in the borough being sent to recycling, reuse or composting in 2023/2024. TWBC's goal is to increase recycling rates in the borough to 65% by 2035 and 85% by 2050 compared to the 2019 baseline (TWBC Climate Action, 2025).

Contaminated land contains substances in or under the land that are actually or potentially hazardous to health or the environment. For example, landfill sites are areas of potential contamination. TWBC are responsible for identifying and managing contaminated land in the borough. Developers are therefore required to undertake a phased risk assessment of the land as part of the planning process. A dataset presenting contaminated land screened across the borough outlines 1170 potential sites, consisting of use types such as sewage treatment works, landfill sites and disused railway lines.

The 2025-2026 Brownfield Register for Tunbridge Wells borough identified 36 brownfield sites within the borough, most of which are within or close to Royal Tunbridge Wells. There are also individual sites in East End, Hawkhurst, Cranbrook, Pembury, Paddock Wood, on Marle Place Road and at Burrswood. Three of these sites have been granted full planning permission.

Agricultural land

The ALC in the borough is predominantly Grade 2, as presented in Figure 5-9. The town of Royal Tunbridge Wells is classified as Urban, with some areas of Grade 3 and Non Agricultural in the nearby area. The north of the borough has some areas of Grade 1 land. There are two more Non Agricultural areas in the south east of the borough, where Bedgebury Forest and Hemsted Forest are located.

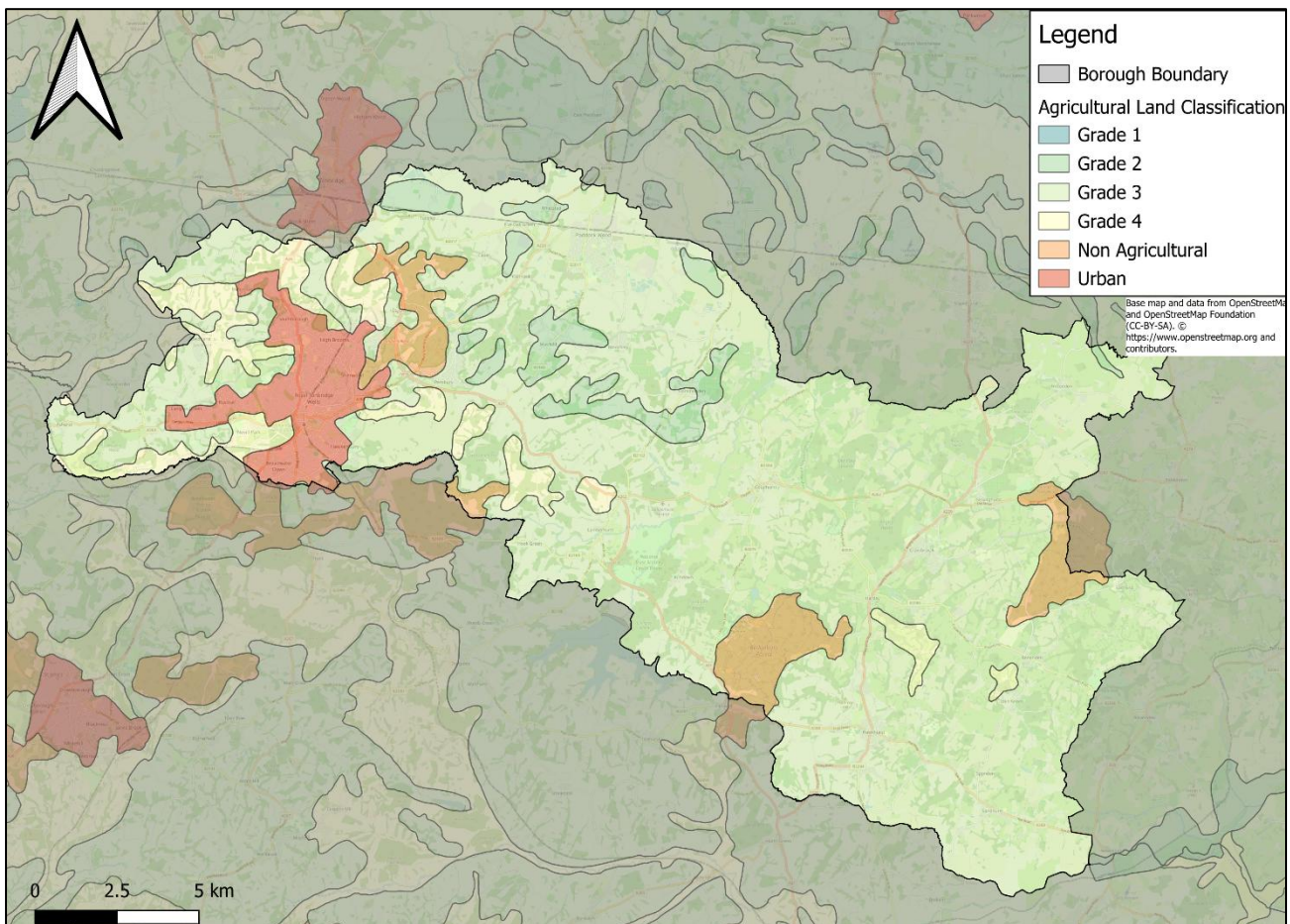


Figure 5-9. Agricultural Land Classification grade in Tunbridge Wells borough.

5.5.2 Summary of key issues

Development on brownfield land or land at risk of contamination could result in the release of contaminants into groundwater or surface water. Any development on contaminated land should adequately deal with the contamination risk as to prevent harm to human health, property and the environment.

The Local Plan Review should also ensure that good quality BMV agricultural land, which covers the majority of the borough, is preserved from development, with brownfield sites taking priority in line with national policy.

5.6 Historic environment

5.6.1 Policy Context

The Ancient Mountains and Archaeological Areas Act 1979 provides protection for the monuments of national interest. This Act seeks to ensure the protection of Scheduled Monuments. The Historic Buildings and Ancient Monuments Act 1953 makes provisions for the compilation of a register of gardens and other land (parks and gardens and battlefields).

The Planning (Listed Building and Conservation Area) Act 1990 provides protection to buildings and area of special architectural or historic interest. The Act outlines that when considering applications for developments that affect a listed building, or its setting, special regard must be given to preserving the building, its setting, or any features of special architectural or historic interest it possesses (Historic England, 2021).

Chapter 16 of the NPPF (2024) provides guidance on conserving and enhancing the historic environment. It outlines that heritage assets, whether designated or non-designated, are 'an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of existing and future generations' (paragraph 202).

Planning Practice Guidance: Historic England (2019) refers to the principle that any planning decisions where listed buildings and their setting and conservation area a factor must address the statutory consideration of the Planning (Listed Buildings and Conservation Areas) Act 1990 (Sections 16, 66 and 72) as well as applying the relevant policies in the plan and the NPPF.

5.6.2 Baseline environment

Heritage assets

Tunbridge Wells borough supports a range of statutory designated heritage sites. There are 25 Conservation Areas, 13 Scheduled Monuments, 2247 Listed Buildings and nine Registered Parks and Gardens. These are outlined within Figure 5-10.

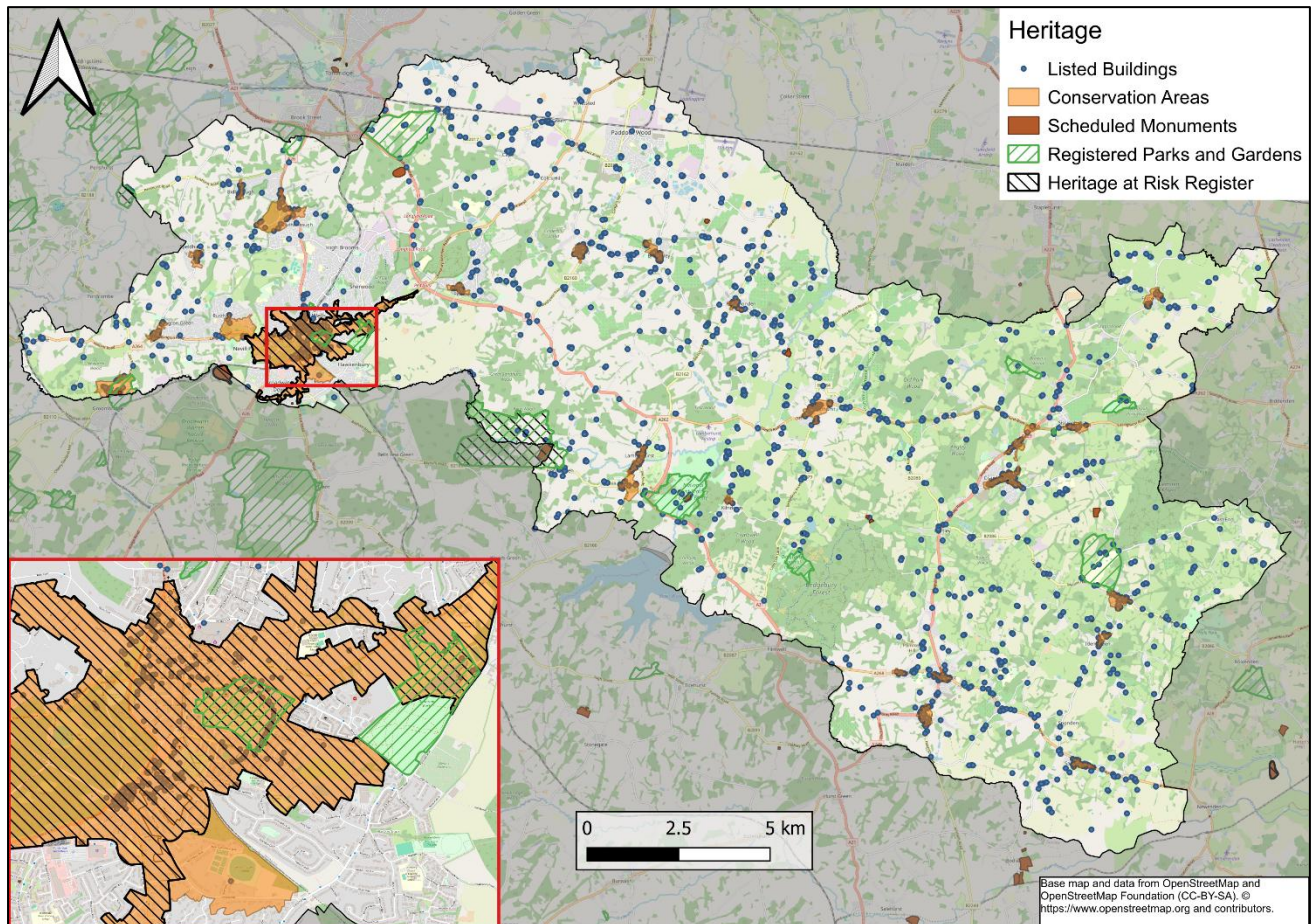


Figure 5-10. Heritage assets in Tunbridge Wells borough.

There are seven Heritage at Risk assets within the borough, as outlined in Table 5-5.

Table 5-5. Heritage at Risk assets in Tunbridge Wells borough.

Entry Name	Settlement	Type	Description
High Rocks Camp	High Rocks	Scheduled Monument	Prehistoric rock shelters and a multivallate hillfort at High Rocks, 209m ESE of High Rocks Inn.
Swaylands	Penshurst	Registered Park and Garden grade II	Terraced gardens and pleasure grounds, including extensive rockwork, and a small landscape park, all developed through the second half of the 19th Century around a country house.
Bedgebury Park, Stable Courts and Garden Terraces	Bedgebury Park	Listed Building grade II	Country house. Core of 1688 with C18 stables. Originally red brick, now clad and extended in sandstone ashlar with slate roof. Red brick stable wing with slate roof.

Entry Name	Settlement	Type	Description
Bayham Abbey	Hook Green	Registered Park and Garden grade II	Premonstratensian abbey founded at Otham about 1200 and moved to Bayham between 1208 and 1211. Stone remains of the church, cloister, chapter-house and dormitory.
Royal Tunbridge Wells	Royal Tunbridge Wells	Conservation Area	Larger Conservation Area covering the historic spa town of Royal Tunbridge Wells, which contains many historic and cultural sites reflecting the rich and diverse historic centre. The history of the town centre, particularly Pantiles, is a large part of the town's tourist economy and culture.
Providence Chapel, Stone Street	Cranbrook	Listed Building grade II	Presbyterian chapel. 1795, 1803, 1808, 1818 and 1828 with late C19 alterations. Timber-framed and weatherboarded with slate roofs, hidden by parapet to front. Weatherboarded to front on first floor with masonry grooving on wooden supports of which one column has a Doric capital.

TWBC also have a 'Local List' of Non-Designated Heritage Assets. These are buildings of local importance, thereby, whilst recognised as being of local importance, they are not afforded the same protection as assets listed by Historic England.

5.6.3 Summary of key issues

The borough of Tunbridge Wells contains a wealth of sensitive heritage assets. The Heritage at Risk Register outlines that a number of these are vulnerable to outside impacts, such as neglect, decay, or inappropriate development and may be deteriorating. Impacts may also be exacerbated by climate change, leading to more extreme weather events and increased flood risk. Any development which has the potential to affect these assets should not detract from their historic setting and should aim to enhance the historic character of the area.

5.7 Population and human health

5.7.1 Policy Context

The Health and Social Care Act 2012 outlines specific duties for all health bodies to have due regard to reducing health inequalities between the people of England.

The Equality Act 2010 established equality duties for all public sector bodies which aim to integrate consideration of the advancement of equality into the day-to-day business of all bodies subject to the duty.

Public Health England (PHE) produces strategies for public health every five years. These set out how the PHE will improve health and reduce health inequalities across the public health system in England. The most recent strategy covers the period 2020 to 2025 with priorities including promoting a healthier nation working towards a fairer society; keeping the public safe; and strengthening the public health system (PHE, 2020). Public health in the borough is managed by the West Kent Health and Care Partnership, which covers the boroughs of Maidstone, Sevenoaks, Tonbridge and Malling and Tunbridge Wells, as well as various organisations within the partnership agreement such as the Maidstone and Tunbridge Wells NHS Trust.

The NPPF (2024) has an overarching purpose of working towards achieving sustainable development. This includes economic, social and environmental objectives. Chapter 8 of the NPPF promotes 'healthy and safe communities' with an emphasis on inclusivity and accessibility. It also includes certain requirements regarding open space, recreation and local green space. Chapter 9 of the NPPF promotes sustainable transport, with an emphasis on providing opportunities to promote walking, cycling and use of public transport. Plans should ensure that developments set out a clear design vision and expectations and are developed with input from local communities, so they reflect local aspirations. Plans should ensure that developments will function well and add to the overall quality of the area over the lifetime of the development.

The Countryside and Rights of Way Act 2000 regulates public rights of way (PRoW) and open access land and ensures access to them.

Planning Practice Guidance: Open space, sports and recreation facilities, public rights of way and local green space (2012) covers numerous topics including the need for local planning authorities to assess the need and opportunities for open space. It also states that PRoWs form an important part of sustainable transport links and should be protected or enhanced.

The most recent Sports and Active Recreation Strategy for Tunbridge Wells covers the period from 2016-2021. The Strategy provides a framework for development of sports activities, facilities and services in the borough in line with national and regional strategies and emphasise how sports and recreation can contribute to other local agendas, such as health and well-being. Objectives of the strategy include enhancing the sports and leisure available for residents, raising aspirations of participants, developing capacity of community sports clubs and working with health partners to develop programmes that assist in reducing inactivity.

A Green Infrastructure Framework (2021) was developed for the Pre-Submission Local Plan to protect and enhance existing green and blue infrastructure. Proposal five of the Framework is for the 'enhancement of links' between key tourist attractions and settlements which includes Royal Tunbridge Wells. The proposals necessitate work to transport infrastructure to encourage a switch from cars to other modes of transport. It is supported by the Tunbridge Wells Local Cycling and Walking Infrastructure Plan (LCWIP) Phase 1 (2019) which provides an approach to developing local networks for cycling and walking,

focused on the town centre where opportunities have been identified for shorter journeys to be made more active. Phase 2 (2021) expands on the Phase 1 study to develop measures for low-traffic neighbourhoods and inter-urban routes which is a safe cycling network connecting the borough's main urban settlements.

5.7.2 Baseline environment

The Tunbridge Wells borough population was predicted by the Office for National Statistics to be around 120,000 in mid-2024, based on previous census data, and since 2011 is a 3.9% increase and lower than the national average. 19.9% of the Tunbridge Wells population are aged 65 or over.

Deprivation

The Indices of Multiple Deprivation (IMD) is based on 39 indicators which cover the seven key themes of deprivation. The Office of National Statistics publishes this as an open data set for England containing its findings. The IMD splits each local authority into Lower Super Output Areas (LSOA) which have an average population of 1500 people or 650 households, to further breakdown and compare data. The most recent update to this data was released in 2025, and has been used as the source for all statistics and mapping outputs in this section.

The IMD deciles are calculated by ranking the 32,844 LSOAs in England from most to least deprived. LSOAs in decile 1 fall within the most 10% deprived of LSOAs nationally and LSOAs in decile 10 fall within the least 10% deprived LSOAs nationally.

The LSOAs (2025) and their respective decile within Tunbridge Wells borough are illustrated in Figure 5-11. As shown, the borough is primarily averaging the upper end of deciles, meaning it is less deprived than the national average overall. The Royal Tunbridge Wells area has the most significant deprivation inequality within the borough, with some areas to the north and south being in the 10% least deprived and to the east and west, such as Broadwater Down and High Brooms being within the top 20% most deprived within the country. The town of Cranbrook is also a notable area of inequality with the south and central area being with the 30% most deprived, and to the north being within the top 20% least deprived, in directly adjacent LSOAs.

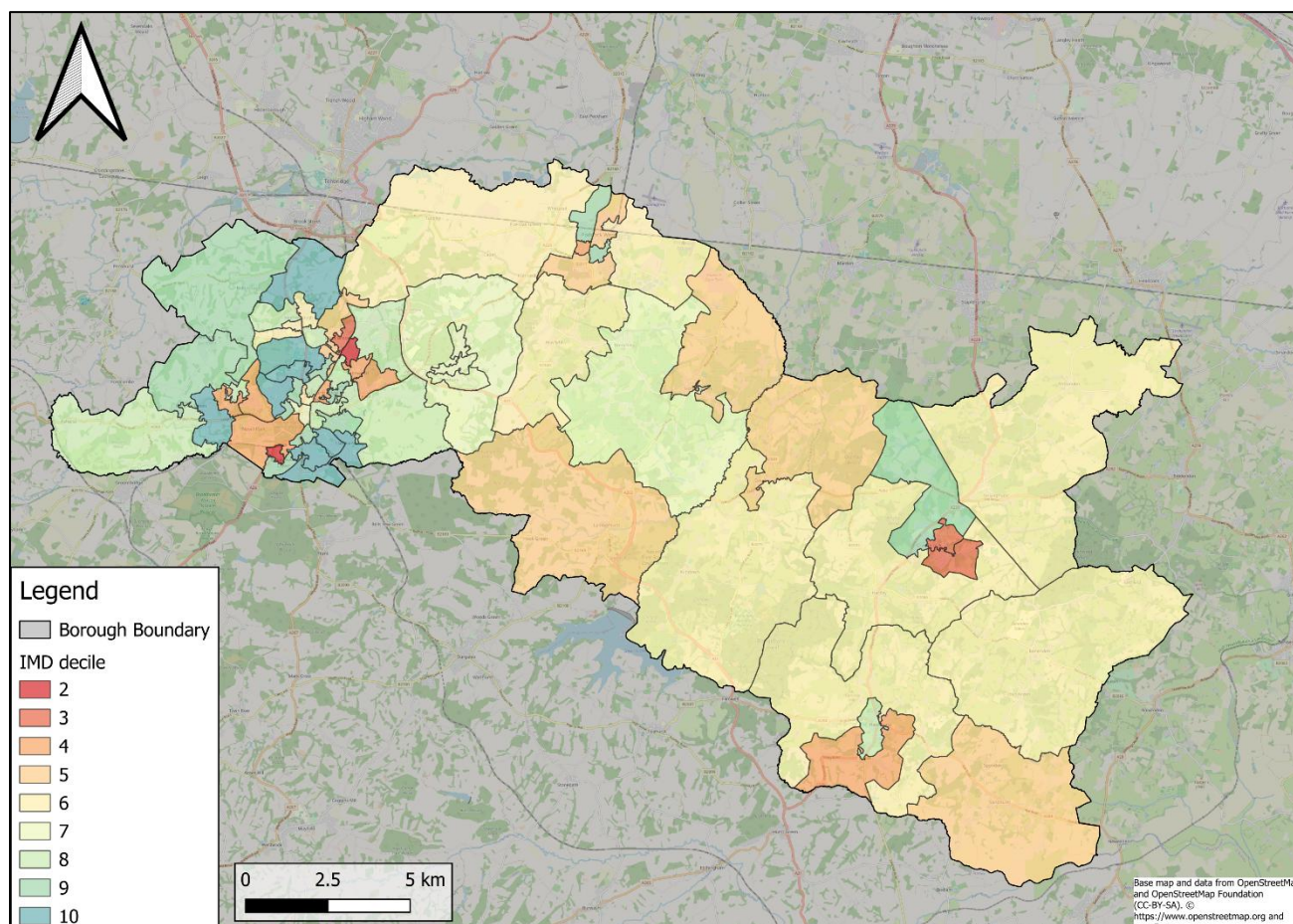


Figure 5-11. Index of Multiple Deprivation deciles (ONS, 2025) by LSOA in Tunbridge Wells borough.

Health

The Health Deprivation and Disability domain of the IMD measures the risk of premature death and the impairment of quality of life through poor physical or mental health. Figure 5-12 presents that cross the borough, the majority of LSOAs are within the top 20% of best health, with the borough's most deprived areas being within the 30% most deprived. For the borough, health is notably better than the national average, and health inequality is less significant than deprivation inequality in the area.

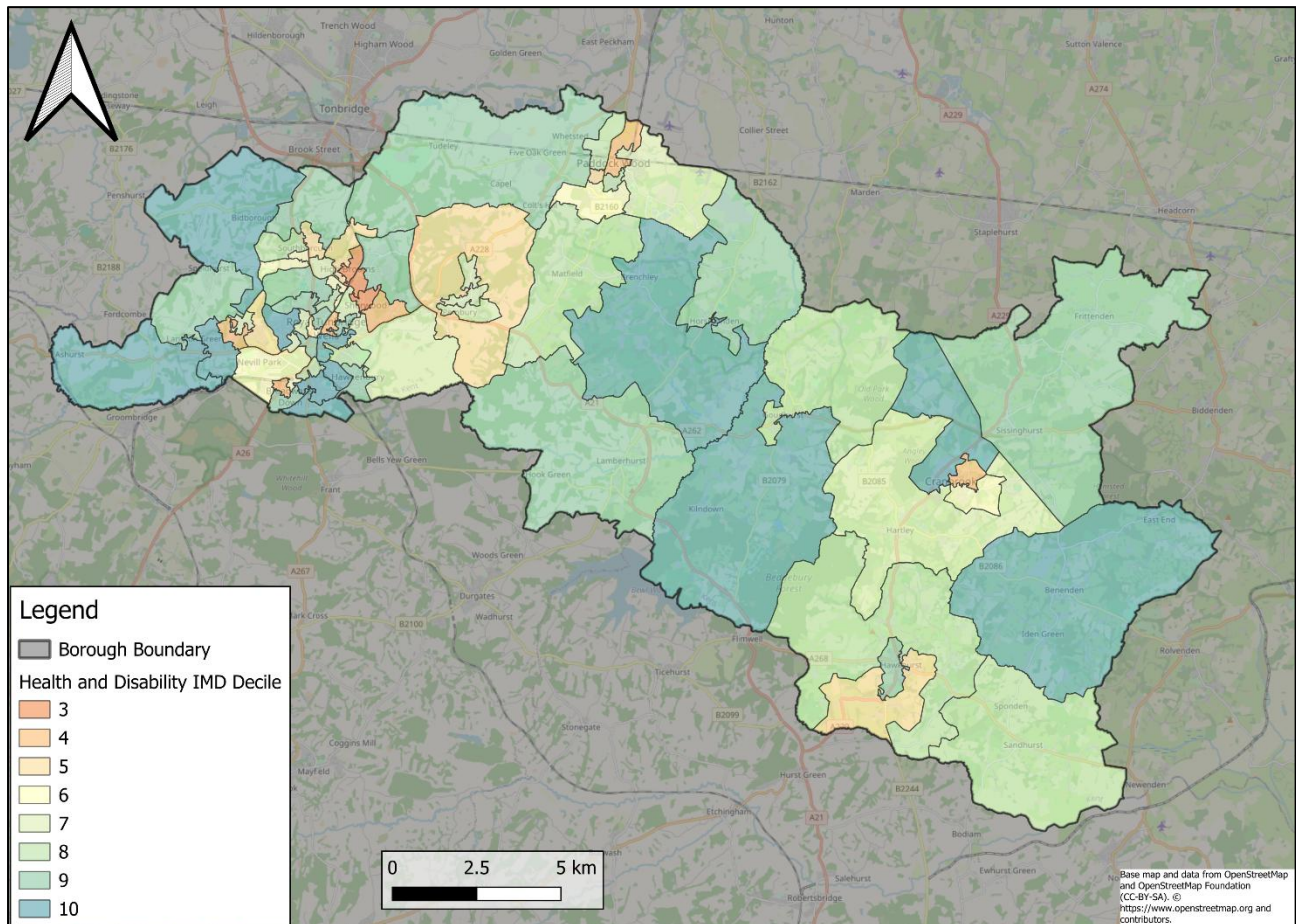


Figure 5-12. Health and Disability IMD decile (ONS, 2025) by LSOA for Tunbridge Wells borough.

Accessibility to services

Figure 5-13 presents that predominantly, the borough is located within the 20% most deprived LSOAs for geographical barriers to services, likely due to parts of the borough being rural in nature when compared to some other areas of the country, meaning services are less readily accessible. This indicator relates to the physical proximity to local services made up of road distances to GPs, general stores, primary schools, and post offices. As shown in Figure 5-13, the hotspots for less deprivation are surrounding the town centre of Royal Tunbridge Wells and other settlements such as Paddock Wood, Cranbrook and Hawkhurst. However, overall, the borough is below the national average for its access to services.

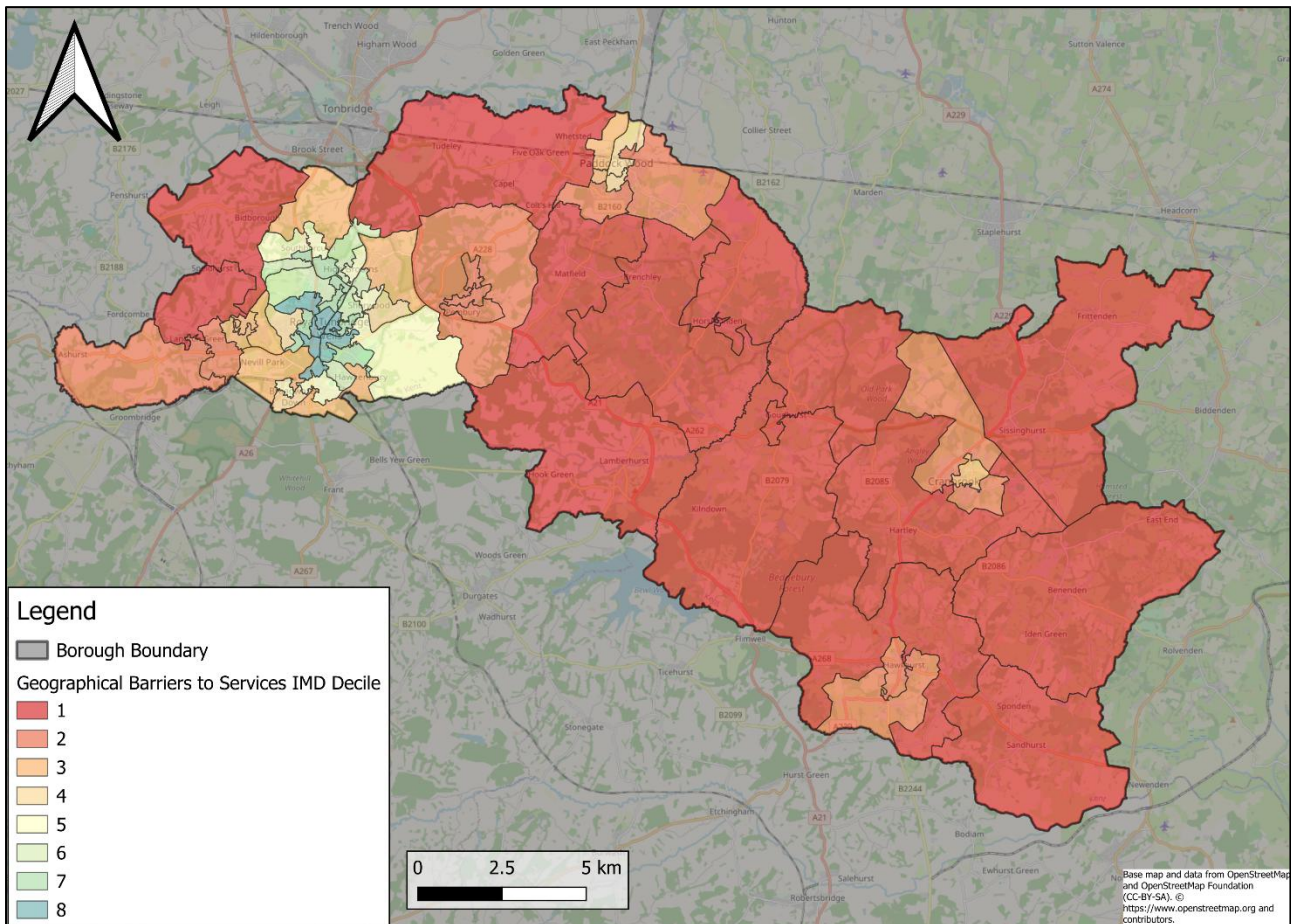


Figure 5-13. Geographical barriers to services IMD decile (ONS, 2025) by LSOA for Tunbridge Wells borough.

Education

There are 33 state funded primary schools in the borough, not including fee paying schools, and eight secondary schools, not including fee paying schools. It must be acknowledged that children do travel outside of the borough for secondary school provision and a further three secondary schools are popular with residents and located outside the borough (TWBC, 2021).

Tunbridge Wells IDP identified that there were sufficient places to meet the demand for primary school education over the plan period. However, there has been significant demand for secondary school places in Tonbridge and Tunbridge Wells non-selective group with temporary expansions required to meet demand. Forecasts indicate that there was a deficit in 2023-24 which will require 60 additional temporary places offered via existing schools. Nonetheless, no further secondary school provision was planned within the IDP (TWBC, 2021).

The town of Royal Tunbridge Wells and its suburbs presents educational attainment well above the national average, falling in the top 20% least deprived of education deciles. However, Figure 5-14 presents that the remainder of the borough falls slightly above the national average, primarily within deciles 6 to 8. There is some inequality presented in the

figure, with more education and skills deprivation in the settlements of Paddock Wood, Cranbrook and Hawkhurst, where LSOAs within the 30% most deprived are located. However, this does not show correlation with education facilities being over capacity according to the data.

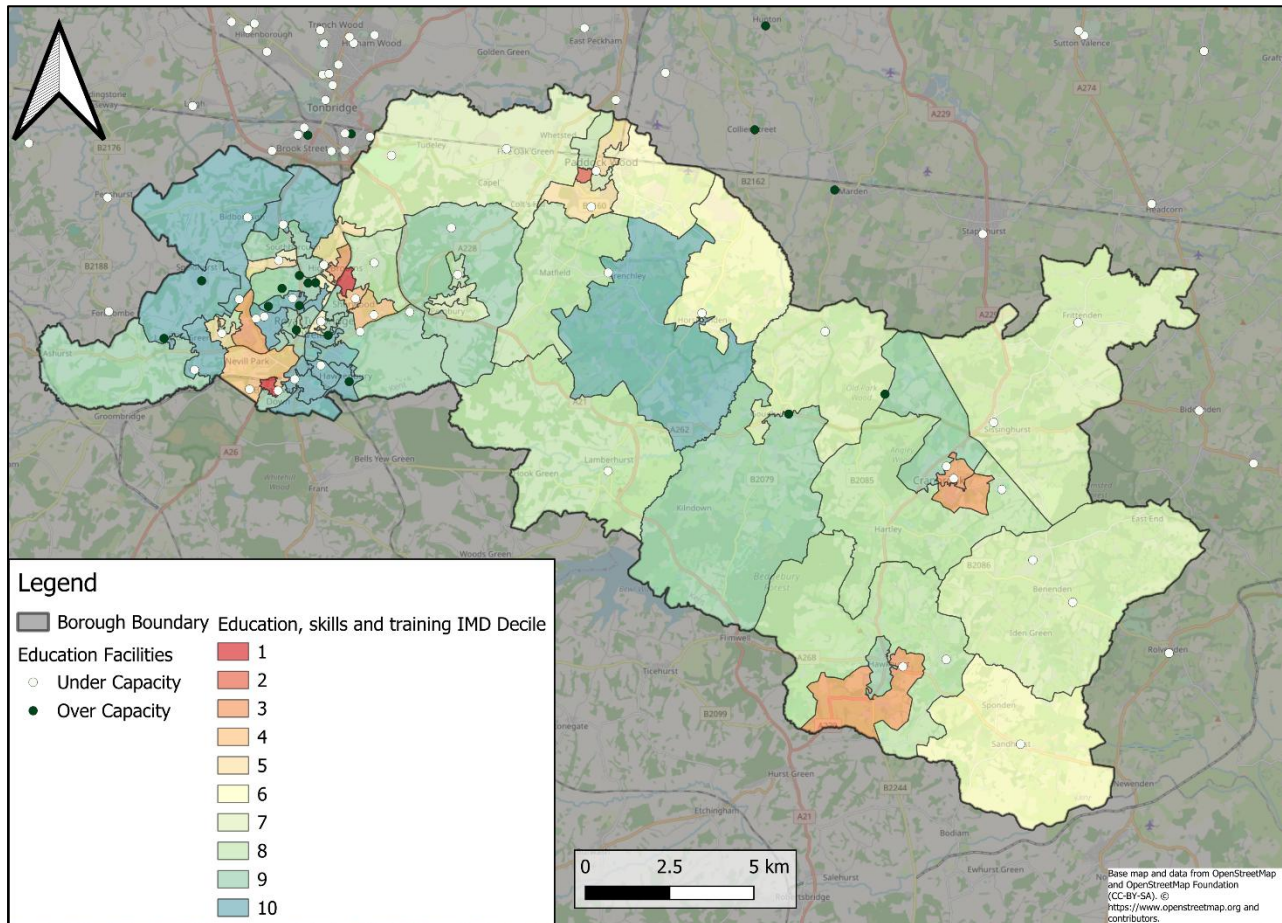


Figure 5-14. Education facilities capacity and education IMD decile (ONS, 2025) by LSOA for Tunbridge Wells borough.

5.7.3 Summary of key issues

Overall, the borough of Tunbridge Wells is less deprived than the national average according to the IMD (2025) findings and is also above average for health and education overall. However, the IMD outlines that numerous LSOAs across the borough are falling within lower deciles for experiencing geographical barriers to services, particularly within the more rural regions outside Royal Tunbridge Wells and other primary settlements. The Local Plan Review should make proposals to reduce service inequality across the region.

5.8 Economy and employment

5.8.1 Policy Context

Paragraph 85 of the NPPF (2024, updated 2025) states that 'planning policies and decisions should 'help create the conditions in which businesses can invest, expand and adapt,' by 'taking into account both local business needs and wider opportunities for development' and giving weight to the need to support productivity and economic growth.

Furthermore, in relation to town centres, Paragraph 90 states that planning policies should promote their 'long-term vitality and viability' and allow for a suitable mix of uses. This is supported by the Town Centres Planning Policy Guidance (ODMP, 2005) which provides guidance to local authorities for making best use of under-utilised space in the town centres and identifying opportunities for improvements, while also conserving the historic character of the area.

The Tunbridge Wells Borough Council Strategic Plan 2024-2032 outlines plans to support urban and rural economies and create more local jobs in the communities. This is planned to happen through enhancing the vitality of town centres, supporting the creation and growth of local businesses, and increasing tourism and visitor opportunities and facilities.

The Tunbridge Wells Economic Development Strategy sets out the aims for the borough over the period 2023-2026. It seeks to support the development of a sustainable and inclusive local economy, provide business support, and create safe and vibrant towns. To achieve this, the borough will aim for Net Zero; create town centre with mixed use destinations of employment, leisure, culture, retail, and community; encourage enterprise; and improve sustainable access and connectivity (TWBC, 2023b).

The Royal Tunbridge Wells Town Centre Plan Draft Vision for 2040 was published for consultation in 2024. This sets out the aims for Royal Tunbridge Wells, the economic centre of the borough. These goals include creating an attractive town centre, harnessing opportunities for change and enabling sustainable transport choices in the face of significant change in how communities interact with retail centres and high streets.

5.8.2 Baseline environment

Employment

The unemployment rate in the borough has fallen from 4.6% in 2021 to 2.3% in 2023 (TWBC, 2023b). Almost a quarter of employees are employed in the Knowledge Economy. The local economy consists largely of micro, small and medium business enterprises. However, there are also a handful of larger employers that contribute significantly to the economic prosperity of the borough. The TW Economic Development Strategy (2023) outlines that the borough has strong representations from sectors such as:

- Finance and insurance
- Scientific and technical
- Wholesale and retail

- Human health and social work
- Hospitality (visitor economy)
- Creative
- Education.

There is also a small manufacturing sector and an extensive agricultural sector that makes up over 90% of borough land use.

The 2021 census statistics present the distances individuals are travelling to work. Over 42% of individuals work predominantly from home, and 27% commute within 10km of their home. However, around 1 in 10 workers in Tunbridge Wells are commuting long distances over 20km, including around 3% of borough workers commuting 40-60km, which is likely to be majority London commuters (ONS, 2021).

The borough has recently been constrained by its lack of appropriate employment sites which has acted as an economic barrier to investment and development. This has stemmed from a conversion of office floorspace into residential premises, particularly in Royal Tunbridge Wells. The remaining employment space is largely requiring renovating and redevelopment to ensure it is fit for modern working requirements.

The Tunbridge Wells Local Plan Review identifies a number of Key Employment Areas and provides allocations for employment land development. These Key Employment Areas are identified as follows:

- Royal Tunbridge Wells Town Centre
- Royal Tunbridge Wells North Farm/Longfield Road Area
- Southborough High Brooms Industrial Area
- Paddock Wood Eldon Way and West of Maidstone Road
- Paddock Wood Transfesa Road East and West
- Hawkhurst Station Business Park
- Capel Brook Farm

The adopted Local Plan also outlines a number of employment allocations which are expected to contribute to employment space development. A significant site in Royal Tunbridge Wells has been allocated for Class E Commercial uses and is expected to provide approximately 80,000sqm of space to form a business park. It is located adjacent to Longfield Road, east of the commercial area at Kingstanding Way.

Economy

The area benefits from its close proximity to London, Gatwick Airport and the channel ports of Folkestone and Dover, allowing for links for the local economy with international business, as well as opportunities for the tourist industry in the region. Royal Tunbridge Wells is the primary urban centre, which provides employment in the retail, education, services and transport sectors. As a historic spa town, the strong visitor and hospitality economy of the borough is focused here. The TWBC Economic Impact of Tourism Report

found that the visitor economy for the entire borough was £289m and supports 3,900 local jobs (TWBC, 2022).

The borough has an average of over 600 new businesses established each year, with the local economy being dominated by these small and micro-businesses. The borough economy is boosted by the relations between businesses in the borough. However, there has been concern surrounding the growth potential of businesses in the area, which was outlined in the Tunbridge Wells Business Survey, prepared as part of the TW Economic Development Strategy (2023b). Almost 50% of local businesses suggested that rising costs were the main barrier limiting the growth of their business.

Town centres and local high streets are also threatened by a period of change and less demand in the area. The Retail, Commercial, Leisure and Town Centre Uses Study Update (2021) for the borough outlines that Royal Tunbridge Wells acts as a regional centre but also has economic influence beyond the borough. It serves a wider catchment area of approximately 490,000 people (TWBC, 2023a) and contains retail offerings in Royal Victoria Place, the High Street, the Pantiles and Camden Road. The Study outlines that town centres must diversify their uses away from traditional retail sectors towards more leisure, cultural and community uses in order to provide better opportunities for maintaining the urban centres of the borough. The role of town centres is changing as a result of local and national changes in shopping patterns and behaviours, as a result of more online shopping and hybrid working which reduces footfall in town centres.

5.8.3 Summary of key issues

Key challenges relating to the economy and employment in Tunbridge Wells are:

- The barriers to growth to local Small-Medium Enterprise (SME) businesses as a result of rising business costs;
- The loss of appropriate employment sites suitable for modern working; and
- The decline of high street businesses because of reduced footfall and a move towards online shopping preference.

An approach should be developed for allowing long-term vitality and viability of the town centre by allowing it to grow and diversify in a way that can respond to rapid changes in the retail industry, allowing for a suitable mix of uses and reflecting each town and villages' unique character and identity.

5.9 Infrastructure

5.9.1 Policy Context

The link between infrastructure and growth is well known. Infrastructure, such as community facilities, roads, hospitals and schools is important not only for establishing sustainable communities, but also to release development. Chapter 2 of the NPPF (2024) outlines the need to achieve sustainable development through economic, social and environmental objectives which includes supporting communities, protecting the

environment, and building a strong community. The appropriate protection and utilisation of Infrastructure should be considered within this. The NPPF also seeks to promote healthy and safe communities through positive planning for the 'provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship), and other local services to enhance the sustainability of communities and residential environments' (paragraph 98).

KCC's Growth and Infrastructure Framework, updated in 2018, provides a strategic framework across the country for identifying and prioritising investment across a range of infrastructure. The framework is fundamental in providing robust evidence to attract investment and engagement, and in supporting the case for public funding bids and packaging projects for major private sector investment. The framework draws together information and data from a range of sources, including district local plans, Infrastructure Delivery Plans (IDPs) and infrastructure and service providers.

TWBC's IDP (updated 2025) details the infrastructure that is required to support the existing and future needs and demands for the borough to support new development and a growing population, as envisaged through the Local Plan. It identifies the capacity issues in the existing infrastructure and sets out the future infrastructure provisions, and indicative costs for the borough to meet the future development needs.

The National Bus Strategy (2021) 'bus back better' sets out the vision and opportunity to deliver better bus services for passengers across England, through ambitious and far-reaching reform of how services are planned and delivered. It all sets out the expectations for local transitions to zero emission bus fleets. This requires Local Transport Authorities, in this case Kent, to produce Bus Service Improvement Plans (BSIPs) to identify targets for achieving measured improvements to the bus network (KCC, 2021).

KCC released their fifth Local Transport Plan in 2024, covering the period until 2037. This document is required in line with the Transport Act 2000, as amended by the Local Transport Act 2008. It requires councils to develop policies for promotion and encouragement of safe, integrated, efficient and economic transport. More recently, it is also required to take climate change into account. This Plan specifically states its ambition is to improve the health, wellbeing and economic prosperity in Kent by delivering a safe, reliable, efficient and affordable transport network in a way that combats climate change concurrently. This will involve means of emission free travel through electric vehicles, increasing public transport use and better infrastructure for walking and cycling.

TWBC published an updated Transport Strategy in 2019 to inform their recently adopted Local Plan. The purpose of the Transport Strategy was to support future development in the borough, addressing existing transport issues and identify new opportunities for mobility. The Strategy recognises there are some increasing travel demands that align with national findings, including more pressure on rural bus services and increasing numbers of delivery vans in residential areas as result of reduced footfall in town centres. Future travel demand predictions suggest that more online shopping will significantly reduce private vehicle trips to town centres, but population and employment growth in the borough is likely to have an

impact on increased private car use. Reduction in rural bus services is likely to cause an increase in vehicle trips, however there is hope to more uptake in walking and cycling as a method of travel if there is more investment into active travel networks.

TWBC also published an Open Space, Sport and Recreation Study in 2018. The Study aims to assess the breadth and quality of open space in the borough, including amenity and natural spaces, parks and recreational ground, play space, allotments, sports pitches and sports facilities.

5.9.2 Baseline environment

Transport Routes

As presented in Figure 5-15, there are numerous key road routes across the borough, but no motorways. These routes meet in Royal Tunbridge Wells town centre, such as the A26 and A264, and are the primary routes connecting the town to the north and London. The A21, A229 and A262 are other arterial routes through the borough, to the east of Royal Tunbridge Wells and connect the borough to surrounding Kent and the southeast coast.

Figure 5-15 also presents the four train stations within the borough. These are Tunbridge Wells, Ashurst, High Brooms and Paddock Wood, which connect the west of the borough to the National Rail network. Most of these stations are on the Hastings Line and connect Royal Tunbridge Wells to London within a journey time of 55 minutes, with the Paddock Wood station in the north of the borough forming part of the South Eastern Main Line and Medway Valley Line. The borough also has the Spa Valley Railway, but this is not considered a public transport network, as it acts as a heritage railway tourist attraction, via the Tunbridge Wells West station.

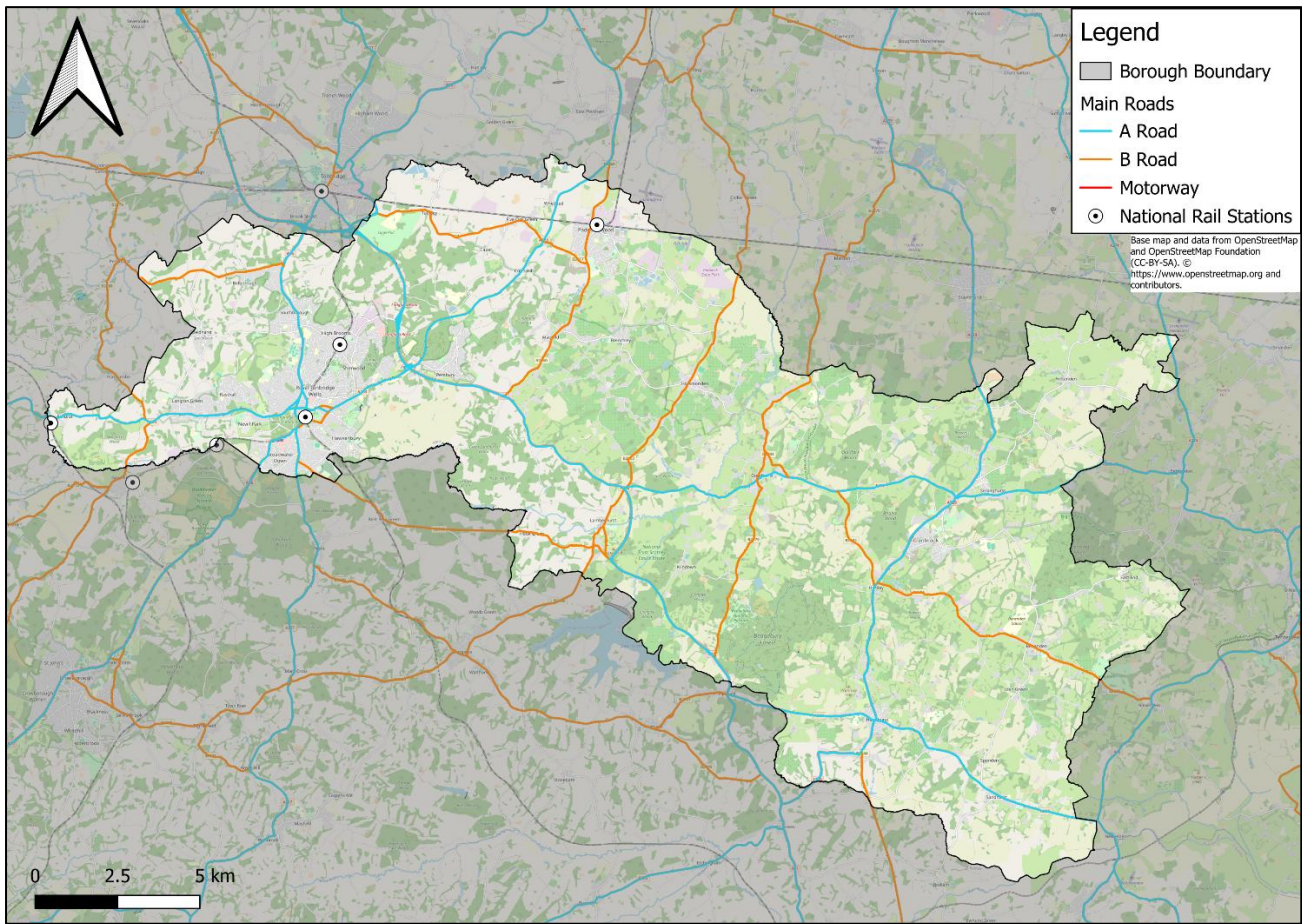


Figure 5-15. Primary road networks and train stations in Tunbridge Wells borough.

Throughout Tunbridge Wells borough, there are 41 bus routes operated by various companies, primarily Arriva South East. There are 680 bus stops in the region. Primary bus routes in the area include:

- 277 from Tunbridge Wells - Tunbridge Wells Hospital
- 281 from High Brooms - Rusthall
- 402/A/B/W from Sevenoaks - Tunbridge Wells
- 582 from Tunbridge Wells - Vinters Park
- 6/H/X from Tunbridge Wells/Hospital - Vinters Park/Pembury
- 7 from Maidstone - Tunbridge Wells

The best served route is the A26 between Tonbridge and Royal Tunbridge Wells (Arriva service 7/204, with a 10 minute frequency) and services from Rusthall through Royal Tunbridge Wells to High Brooms (Arriva Service 281 with a 15 minute frequency). Buses in the area also bring a high proportion of pupils to the many secondary schools in the area. However, overall bus usage in the area is generally very low (TWBC, 2019).

Bus operators have raised concern with the lack of layover parking for drivers between journeys. Several operators have begun using coach parking, as well as bus stands, but space is limited. This is something that should be addressed if bus services are expected to support greater capacity going forward.

Recreational Green Space

The borough contains a number of open green space areas to be used for recreation. There are 224 identified areas of open space for sport and recreation in the region, and these are presented in Figure 5-16. Some of the larger public areas surrounding Royal Tunbridge Wells include Dunorlan Park, and Grosvenor and Hilbert Park. It is worth noting that according to the open space data, the majority of open green spaces of significant size are private outdoor space, primarily Golf and Tennis clubs. These are not accessible for the public.

The TWBC Open Space Study (Ethos Environmental Planning, 2018) conducted a community consultation that found that the majority of respondents believe there is a general need for more facilities for young people, such as Multi-Use Game Areas. A smaller but still substantial number of respondents feel the borough contains enough allotments, recreational facilities, and parks and recreation grounds. For all open space types, most households consider that these are of average or better quality. However, the study found that there is a deficit of approximately 11 hectares under the recommended quantity standard for green space. This Study also found that indoor facilities needed a variety of improvements, parks and recreation ground needed additional space to account for population growth, and that play areas and youth facilities require new provision and refurbishment of existing facilities (Ethos Environmental Planning, 2018).

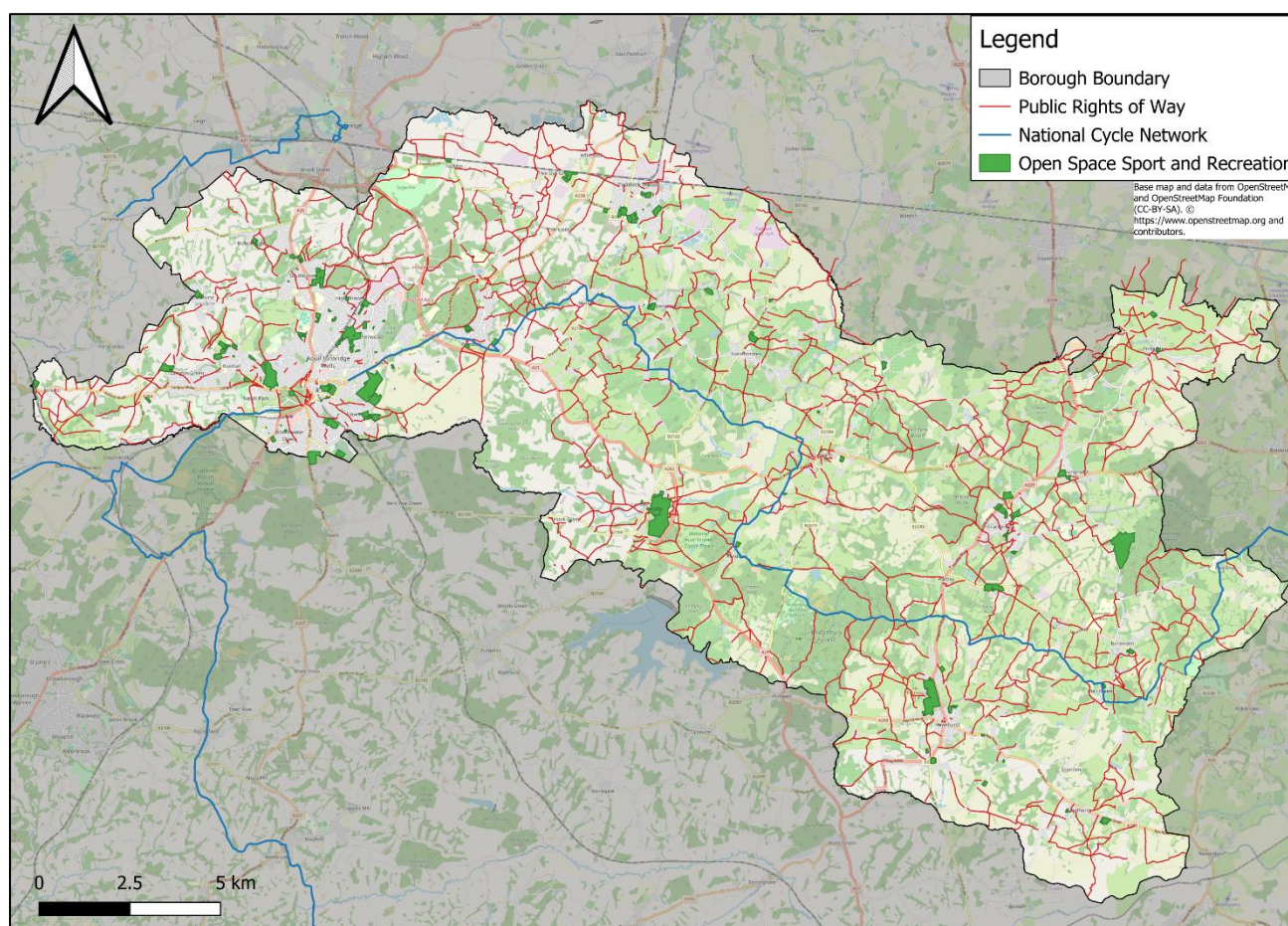


Figure 5-16. PRoWs, NCNs and Open Space within Tunbridge Wells borough.

There is also an extensive network of PRoWs and National Cycle Networks (NCNs) throughout the borough, as presented in Figure 5-16. These are important as they can double as recreational space and active transport routes, which encourages healthy lifestyles as well as reduces carbon emissions from vehicle use.

Sports and Leisure Facilities

In 2018 TWBC produced the Borough Indoor/Built Sports Facilities Needs Assessment. This found that generally, the borough has a more affluent population than the national average, which links closely with higher patterns of sports participation. There are three facilities operating in the Borough which can be characterised as community leisure centres, and they are all operating on behalf of the Council (TWBC, 2018):

- Tunbridge Wells Sports Centre ('wet and dry', with key facilities including sports hall, three pool complex, squash courts, indoor tennis centre, gyms and studios, restaurant, café)
- Putland Sport and Leisure Centre ('dry' with sports hall, gym and studio)
- The Wealds Sports Centre ('wet and dry' with swimming pool, sports hall, gym, and studio).

The Assessment also outlines the importance of developer contributions required as part of new development, to provide investment into community facilities and sports facilities as this will form a large proportion of future investment.

Healthcare Facilities

The main public hospital in the borough is Tunbridge Wells Hospital at Pembury. This is a large district general hospital, with an A&E department, surgery, maternity ward, children's services and general hospital care. It is operated by the Maidstone and Tunbridge Wells NHS Trust.

There are also dentists and General Practitioner (GP) surgeries that serve the borough population within the primary settlements. According to a search of the NHS GP surgeries, almost all surgeries within the borough are open to accepting new patients, which suggests there is adequate capacity to serve the local population. Health and social care facilities within the borough are mapped in Figure 5-17.

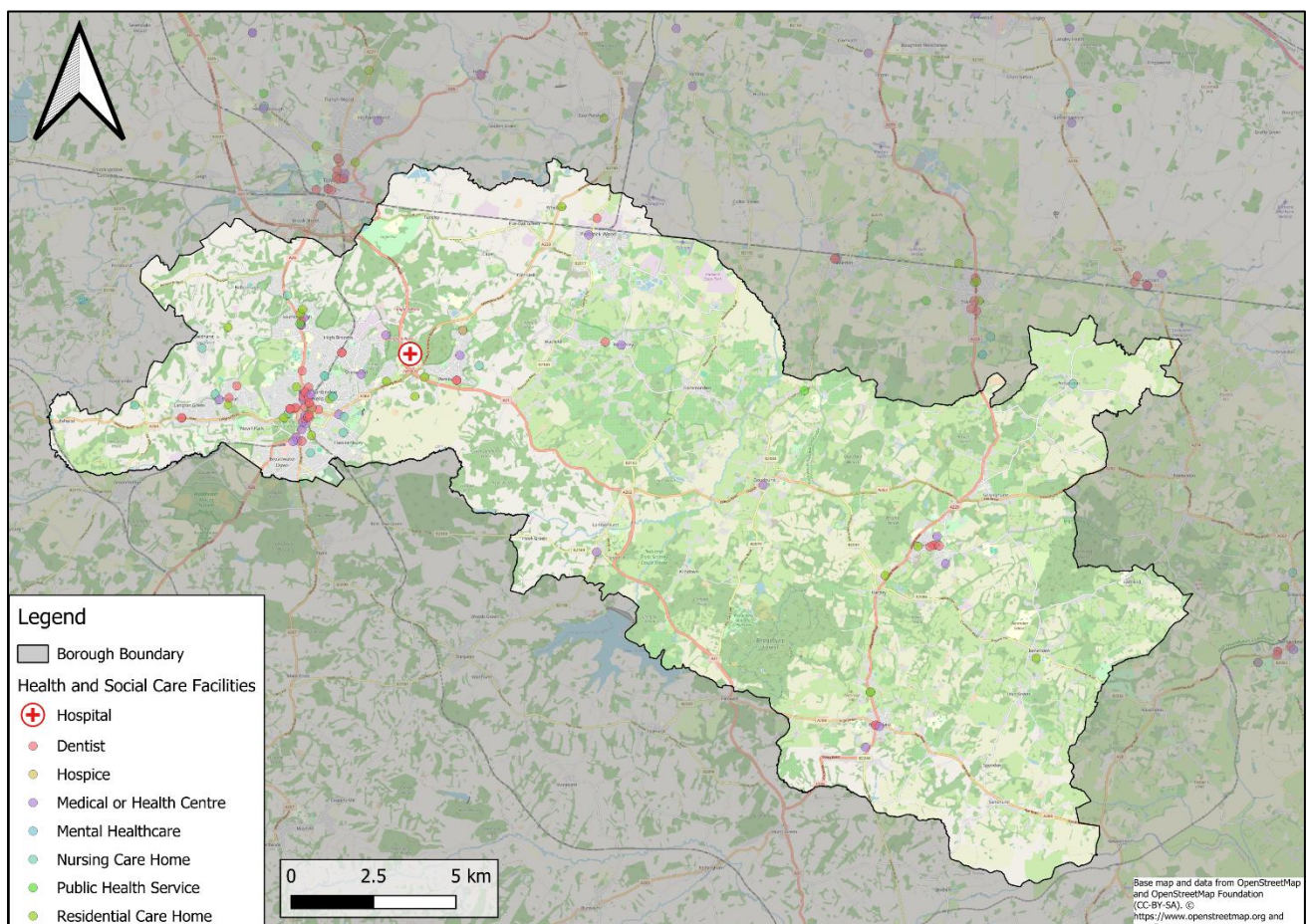


Figure 5-17. Health and Social Care Facilities within Tunbridge Wells borough.

5.9.3 Summary of key issues

Sports and recreational facilities require some improvement, particularly for young people. The Local Plan Review should introduce policies that ensure developer contributions are

required, to ensure there is an adequate funding stream for these facilities, particularly when facing increasing demand from population increases dependency on cars.

There is also a need to address the pressures on bus networks. Bus operators outline the lack of available bus parking, and the Transport Strategy suggests there is pressure on networks in rural areas. If the borough wishes to encourage the use of public transport it is crucial more investment and infrastructure is seen for bus networks. This is particularly important considering much of the borough is not served by a trainline. Investment into active travel networks should also be considered to encourage more sustainable transport choices for residents.

5.10 Climate change

5.10.1 Policy context

Under the Climate Change Act 2008, the UK is legally obliged to achieve a 100% reduction in its carbon emissions compared to 1990 baseline levels by the year 2050 (commonly referred to as 'net zero'). The Climate Change Act outlines a five-year cycle of requirements which the UK must adhere to, relating to both climate mitigation and adaptation. These requirements include setting a series of legally binding five-year carbon budgets (restrictions on greenhouse gas emissions) designed to help steer progress towards achievement of the overall net zero target.

The UK Government established the Climate Change Committee and its Adaptation Committee to provide the latest evidence and provide advice to the UK Government on climate change risks and opportunities and to assess progress in adapting to climate change in England. The UK Climate Change Risk Assessment (CCRA) is a five-yearly assessment of the major risks and opportunities from climate change to the UK, including the costly impacts of climate change on health and productivity as well as water availability and energy supply. It serves to highlight the imperative nature of reducing greenhouse gas (GHG) emissions. The most recent of which was the third risk assessment published in 2022 (Defra, 2022).

Paragraph 158 of the NPPF (2024) states that 'Plans should take a proactive approach to mitigating and adapting to climate change' and 'policies should support appropriate measures to ensure the future resilience of communities and climate resilience of communities and infrastructure to climate impacts.' New developments should therefore be planned for in a way that avoids increased vulnerability to climate change and that helps reduce gas emissions.

TWBC declared a Climate Emergency in 2019, and the borough has made a commitment to review and put forward actions to address the emergency. The Corporate Carbon Descent Plan (TWBC, 2021c) was the first step in the process and brings together the results of extensive modelling and a carbon audit to inform and influence TWBC's actions on reducing the council's carbon emissions in terms of council buildings, corporate energy, governance, reports and transport.

TWBC published their Borough Climate Change Strategy in 2025. The Strategy acknowledges the work required to drive local climate action and provides a framework for delivering climate action by the council, residents and wider stakeholders. This document involves Action Plans for seven priority areas for tackling climate change, which are buildings; transport; biodiversity and enhancement; renewable energy; waste and resources; business and community engagement; and adaptation.

5.10.2 Baseline environment

Climate patterns

Royal Tunbridge Wells is in the southern England climate region which stretches from Kent, including the Medway towns then westwards towards Dorset (Met Office, 2016), and experiences a Marine west coast, warm summer climate. The mean annual temperature range for the region is between 9.5 and 11.5°C, compared to the UK mean of 6-14°C. Temperatures in the region follow seasonal and diurnal variation. January is the coldest month with mean daily minimum temperatures of 0.5°C, over higher ground. Extreme minimum temperatures usually occur in December and January. July is the warmest month with mean daily maximum temperatures of 21°C. Extreme maximum temperatures can occur in July or August and usually last several days. Rainfall is generally well-distributed throughout the year but with an autumn/early winter maximum that is more pronounced in counties bordering the English Channel. The Thames Valley, London and north Kent coast normally receives less than 650mm of rain per year (Met Office, 2016).

Southern England is one of the more sheltered parts of the UK, with the strongest winds being associated with the passage of deep areas of low pressure close to or across the UK. The frequency, strength and speed of these depressions is greatest in the Winter (Met Office, 2016).

Future Climate

The Met Office Local Authority Climate Explorer tool outlines that under climate change projections, the average daily temperature in the borough could increase up to 2°C per day under a 2°C global warming scenario compared to pre-industrial global levels, which is currently predicted by 2050. Under the same scenario, summer temperatures could increase up to 5°C per day on average, compared to 1981-2000 baseline levels. For example, the hottest day in the past 30 years within the borough was 35.4°C, which means temperatures close to 40°C are possible. The projections also show that there could be up to 10 days a year where the borough experiences temperatures over 30°C.

According to the same data, precipitation rates in winter could increase by 32% and decrease in summer by 4%, presenting further extremes in weather conditions across the year.

The Third Climate Change Risk Assessment (2022) estimates that the cost of climate change to the UK are high and increasing, with estimated damages to exceed £1bn per annum, which includes risks from flooding and risks to infrastructure networks. It also found that early adaptation investments in heatwave alerts and plans, surveillance and monitoring for pests and diseases, early warning systems, and climate infrastructure were effective and would deliver value for money (Defra, 2022).

Carbon Emissions

TWBC published the Borough Emissions Report (2025) which outlined carbon emissions output. In 2023, this was 422ktCO₂e, which is a significant reduction of over a quarter since

2015, where total emissions were 600ktCO₂e. This trend generally stems from the decarbonisation of the national grid; however, some further reductions are as a result of improved transport and building energy efficiencies. The most significant output was from gas usage, contributing 92.5ktCO₂e, followed by 86.8ktCO₂e contributed from Road Transport (A roads). The borough sequesters the fourth most CO₂e emissions across the country. Tunbridge Wells has a significantly wooded landscape which supports natural carbon sequestration, and this could be under threat from impacts of climate change.

5.10.3 Summary of key issues

The borough is vulnerable to increase temperatures and extreme weather year round, under proposed future climate scenarios. As a result, it is crucial that the Local Plan Review makes efforts to continue measures towards reducing climate emissions, as well as policies that encourage climate resilient infrastructure and development.

Climate resilience is also important for the natural capital of the borough, particularly as 22.2% of the borough is covered by woodland (TWBC Climate Action, 2025). Forests are crucial for carbon sequestration, and these habitats are vulnerable to droughts and extreme temperatures. Climate resilient species of trees could be a future solution, however for the present woodland cover it is necessary to minimise local impacts to the environment as much as possible through effective climate mitigation and other means of adaptation.

5.11 Air quality and noise

5.11.1 Policy Context

Control of Pollution Act 1974 makes provision for waste disposal, water pollution, noise atmospheric pollution and public health' and for purposes connected with the matters aforesaid. The Air Quality Regulations 2000 set standards and objectives for seven pollutants that are associated with local air quality. The objectives are aimed at reducing the health effects of the pollutants to negligible levels.

The Clean Air Strategy outlines the approach and plan for tackling all sources of air pollution and the plan for protecting nature and boosting the economy (UK Government, 2019).

The UK Government's Environmental Improvement Plan (EIP) 2025 outlines Goal 2 of Chapter 2: Improving Environmental Quality to be Air, focusing on achieving clean air. This involves outlining the goal of reducing emissions and pollution exposure to air pollutants. The EIP states that local authorities and their partners are responsible for improving air quality in their local area, and that the government will support councils to continually improve air quality by providing clear guidance, advice and tools.

The Environment Act 1995 requires all local authorities to regularly review and assess air quality in their areas, and to determine whether the air quality objectives are likely to be achieved. As such, the Tunbridge Wells Air Quality Action Plan 2018-2023 (TWBC, 2020) outlines the expectations for Local Authorities to work towards reducing emissions in their

local area, and this Plan sets out the strategy to achieve this within the borough. This includes an action plan with aims to:

- Ensure that TWBC is complying with relevant air quality legislation.
- Achieve a higher standard of air quality across the Tunbridge Wells borough.
- Engage with partners and colleagues including those representing Highways and Transportation, Public Health, Economic Development, local bus companies and other relevant stakeholders, to improve air quality across the borough.
- Build on previous work in this area in order to drive further improvements in air quality with the ultimate aim of being able to revoke the Air Quality Management Area.
- The TWBC Climate Change Strategy (2025) states that climate change impacts as a result of poor air quality are already felt in the area, including health-related issues from air pollution. By reducing GHG emissions, the Strategy aims to address climate and public health challenges occurring as a result of air pollution. This should have benefits such as cleaner air, reduced pressure on the NHS, enhanced energy security, growth in the low-carbon economy and reductions in poverty as a result.

Environmental Noise (England) Regulations 2006 (as amended) transposed the EU's Environmental Noise Directive into domestic law for England and primarily applies to noise from transport. It requires the government to produce noise mapping of environmental noise sources every five years. These maps are used to produce noise action plans. Defra has produced a series of Noise Action Plans which provided a framework to manage environmental noise and its effects. They aim to protect quiet areas in large urban areas where the noise quality is considered good. The fourth round of noise mapping was completed in 2022 for railways and roads.

The Tunbridge Wells Borough Noise and Vibration Supplementary Planning Document (SPD) was adopted in 2014 and provides guidance for developers and decision makers to ensure there is sufficient mitigation for noise to prevent substantial loss of amenity at the development stage. This includes consideration of the statutory provisions for noise outlined in the Control of Pollution Act 1973 and Environmental Protection Act 1990, as well as government legislation and guidance on noise control.

5.11.2 Baseline environment

Air pollution

The primary source of air pollution in the borough is road traffic emissions. The Tunbridge Wells Air Quality Annual Status Report 2024 outlines a number of programmes implemented in the borough. It concluded that only one monitoring site in the borough recorded an exceedance of the annual NO₂ mean objective in 2023. This was a site on Pembury Road, however the monitoring site was set far back from properties and is therefore not representative of relevant receptor exposure. Therefore, no monitoring

locations are considered to exceed the annual mean objective when distances to the nearest receptor are corrected.

When the Air Quality Action Plan for the borough was initially adopted, it outlined that nitrogen dioxide levels have exceeded relevant objectives set for many years but have been on a downward trend since 2014. In 2017, the objective level was achieved and was the lowest on record.

An Air Quality Management Area (AQMA) was declared in 2005 along the A26, parallel to the western boundary of the town centre of Royal Tunbridge Wells, but was revoked in 2024.

Air quality modelling has taken place in the borough, using air quality measurements predominantly collected in 2019. TWBC have been undertaking air quality monitoring in Hawkhurst, a small village 12km south-east of Royal Tunbridge Wells. The pollutant of most significant concern for most local authorities is nitrogen dioxide (NO₂). The findings show that at the majority of affected properties, any exceedance is borderline, but as a precaution all these properties have been included within the AQMA. This is outlined within the Tunbridge Wells Annual Status Report 2020. As a result, an AQMA is designated along the Cranbrook Road in Hawkhurst, which is presented in Figure 5-18. An Action Quality Action Plan was also developed for Hawkhurst and published in 2023.

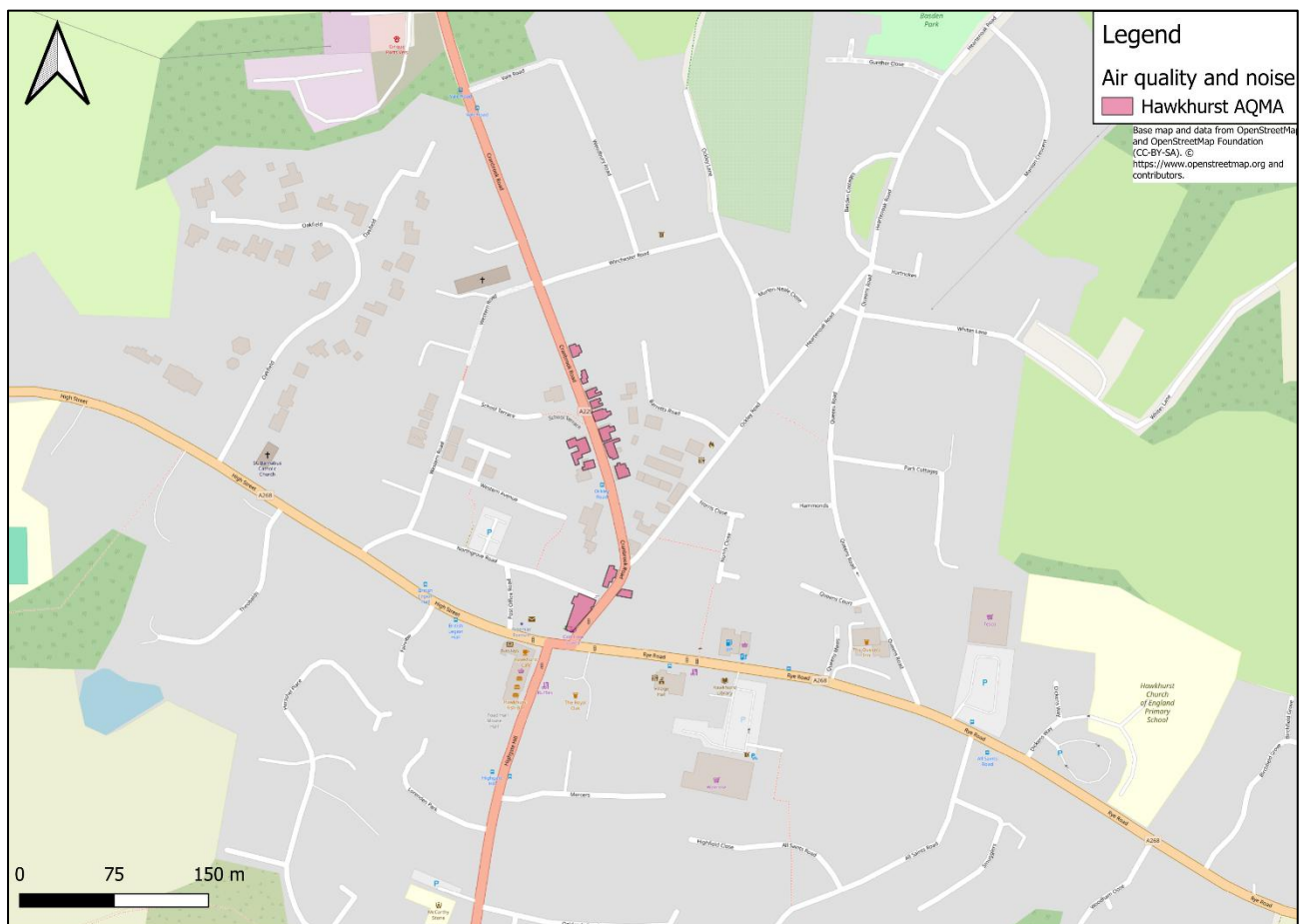


Figure 5-18. Hawkhurst AQMA.

The Tunbridge Wells Annual Status Report (2024) outlines that the Hawkhurst Area has seen particular improvement. Diffusion tubes did not measure any exceedances in this area, and therefore the Report suggests that it is recommended to remodel the Hawkhurst AQMA in the near future, in order to clarify whether receptors are now compliant with recommended NO₂ levels.

Noise pollution

Figure 5-19 shows the areas identified in Defra's Noise Action Plans (2019) which require local management, surrounding Royal Tunbridge Wells. Areas of noise concern identified by Defra are also along the A21 across the borough, and centrally in the settlement of Lamberhurst, Flimwell, Goudhurst and on the A229 outside Cranbrook. These are mapped as showing exposure to environmental noise from major sources of road, aircraft and rail in urban areas. The local authority is responsible for the management of this noise.

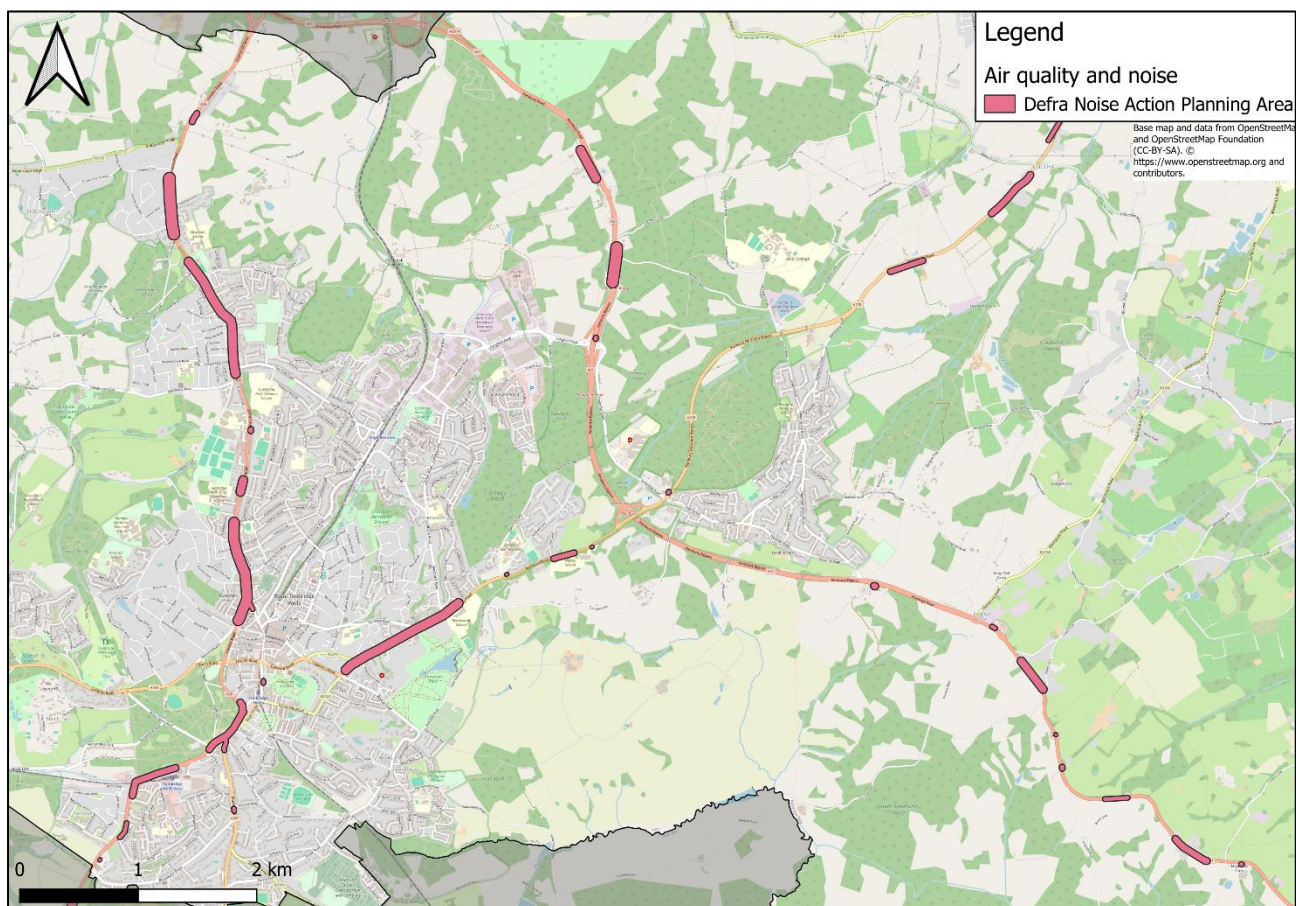


Figure 5-19. Noise Action Planning Areas surrounding Royal Tunbridge Wells.

5.11.3 Summary of key issues

Two AQMAs have been designated within the borough due to concerns for nitrogen dioxide levels in this region, primarily as a result of vehicle emissions. The Local Plan Review should seek to reduce road traffic pollution, both from NO₂ and noise, through promoting and facilitating public transport and active travel use for visitors to the town centre with the

aim to improve air quality, and also installing more EV charging stations to provide more of an incentive for residents to purchase electric vehicles.

5.12 Town Centre Key Issues

5.12.1 Royal Tunbridge Wells

Royal Tunbridge Wells is a primary business, leisure, cultural and visitor destination in the borough, and is a vibrant and viable town centre. It is recognised that the town has been affected by changes to the national and local and commercial economy as a result of changes to economic structure and shopping patterns.

A notable concern for Royal Tunbridge Wells is preservation and enhancement of the 'Spa Town' character. The economy of the town relies heavily on the tourist industry through visits to its historic centre and Spa Valley Railway. The town contains a wealth of heritage assets, and many that are vulnerable to deterioration including the Royal Tunbridge Wells Conservation Area itself. There is potential that adverse impacts will arise from extensive development and also worsening climate change impacts.

The town is also at risk of surface water flooding. Within the past decade there have been a number of flash flood events in Royal Tunbridge Wells, including at The Pantiles, Mount Pleasant Road, Royal Victoria Palace and High Brooms, as a result of heavy summer rainfall. Sewer and infrastructure flooding has contributed to this. Surface water flooding should be managed by improving drainage systems and avoiding any further development that may increase the amount of impermeable surfaces in high surface water flood risk areas. This is particularly important as the area is likely to experience rapid development during to the increasing population, which can exacerbate surface water flood risk and also make an increasing number of residents vulnerable to the effects.

Growing pressures on the infrastructure of the town are likely to occur as a result of new residential development and expansion of the town. This development should occur largely on previously developed brownfield land to protect the Green Belt that surrounds the settlement.

There has been a loss of appropriate employment sites that are suitable for modern working in the town centre. This should be managed to ensure adequate employment opportunities and to maintain footfall that can support retail zones.

TWBC should work towards reducing road traffic in the town centre of Royal Tunbridge Wells and facilitating improved public transport services and active travel routes for visitors. This would work towards reducing the borough emissions output and reducing climate change impacts and also contribute to reducing vehicular emissions that contribute to the AQMA in this area.

5.12.2 Paddock Wood

Paddock Wood is a town that is well-used by local residents and visitors from surrounding villages and settlements, including outside the borough. It provides a wide range of services and amenities that support the residents of Paddock Wood as well as smaller settlements in the east of the borough and contains a mix of independent and national businesses.

The Neighbourhood Plan for Paddock Wood (2023) outlines objectives that should be achieved in the town over the plan period. The Local Plan Review for Tunbridge Wells should align with these objectives. These include:

- Delivering social and environmental infrastructure that is necessary to support a growing community.
- Coordinating new development so that it contributes to the creation of a safe and sustainable community with good access to essential services.
- Maintaining and enhancing the character of Paddock Wood as a rural market town, promoting its culture, economy and heritage in the process.
- Ensuring high quality new development that is sympathetic to the local context.
- Creating a robust and flexible road network and spaces suitable for all modes of travel.
- Maintaining existing sports facilities and creating additional facilities to meet the needs of population growth.
- Enhancing the town's natural beauty and countryside.
- Creating a thriving town centre that is a focal point for residents and visitors.

There is a need for the town centre to be able to support additional growth while maintaining its character. It is established that the borough is required to meet its housing need, whilst having regard to historic townscapes of major settlements.

Protecting biodiversity and retaining important areas of green infrastructure should be a priority within Paddock Wood, as well as in the borough overall.

During the consultation, local people expressed a desire to retain green spaces for health and leisure, and investing in new spaces and provisions, including a new sports hub north of the railway line, improvements to existing facilities and providing facilities and activities for younger people. This aligns with the findings of the Open Space Assessment, which highlights the borough is missing open space and leisure facilities particularly for the teenage years.

There are also local concerns for flood risk and concerns with drainage capacity which may be exacerbated by population increases and more urban land use as a result of development. Climate change resulting in precipitation increase is also expected to exacerbate this issue. Significant historical flood events have occurred in and around Paddock Wood, as a result of the River Medway and its tributaries running through this area. Much of the settlement is located within Flood Zone 2 and 3, particularly surrounding the railway line.

There are concerns from residents for the spatial divide in Paddock Wood that the railway line creates. This impacts traffic congestion and expansion of service networks, as well as active transport networks. The Local Plan Review should aim to reduce the north and south barrier that is created by the railway line.

5.13 Future baseline

The SEA guidance outlines that wherever possible, data should be included on historic and likely future trends, including a 'business as usual' scenario which presents the anticipated trends in the absence of the Local Plan Review being introduced. This information enables the potential effects of the implementation of the plan to be assessed in the context of existing and potential environmental, economic, and social trends. This section therefore considers potential trends that could arise in the absence of the Local Plan Review.

5.13.1 Environment

Without the development of the Local Plan Review to guide development needs of the area, there is a risk that valued natural assets may be at risk through ad hoc developments without strategic planning. The future baseline trends identified of relevance to the environment include:

- Future development placing additional pressure on the sensitive landscape and historic character of towns. The high-quality landscape and heritage assets are a valuable resource to the borough, residents and the tourist economy, and ad hoc development may result in the degradation of these assets.
- Expected development to meet the borough housing need can also be expected to cause habitat loss and decrease habitat connectivity, resulting in adverse effects to ecosystems as a result of greenfield land use.
- Projected increases in precipitation events particularly in the summer months are likely to result in overwhelm to drains and sewer systems due to increased surface water run-off. In turn, this could contribute to localised flood events, which may have implications for human health, infrastructure, the economy and designated sites.
- Projected temperature increases are expected to create stress on the water supply in drought periods within the next decade and can have impacts on human health.
- Climate change contributing to the degradation of designated ecological sites and priority habitats.
- Isolation and fragmentation of open spaces and gardens, and habitat connectivity.

5.13.2 Social

There are patterns of deprivation inequality in the borough, with rural areas having significantly more barriers to services and lower education and attainment ranking. It is possible population increase could contribute to worsening this, as infrastructure cannot support the increased demand and any investment is likely to be within primary settlements.

- Increased pressure on secondary education provisions across the study area.
- The difficulties around delivering green infrastructure in spaces with changing land use pressures, particularly main settlements alongside population growth.
- Without investment and take up of more active travel and public transport options, increasing population and visitor numbers could place additional pressures on congested roads, exacerbating air and noise pollution and worsening AQMA conditions.
- Existing leisure facilities and public green spaces are currently unable to meet demand and require development contributions for increased investment to meet requirements.

5.13.3 Economy

Overall, the borough is performing well, with higher than average income for its residents and many small business start-ups in the area. The future baseline trends relevant to the economy include:

- Continued loss of employment space to residential development or requiring significant renovation, reducing availability in primary commercial areas.
- Deterioration of the high street, as town centres are experiencing reduced footfall from a change in shopping patterns.
- Without strategic direction, it is possible development could end up focused on delivering the needs of the visitor economy without addressing the needs of the local economy.

6 Proposed Scope of Assessment

6.1 Introduction

The purpose of the scoping stage is to focus the SEA on the sustainability issues which are relevant to the Local Plan Review. The assessment will focus on those effects that are likely to be significant, whether positive or negative.

In accordance with Schedule 2 of the SEA Regulations, the SEA must consider the "likely significant effects on the environment, including short, medium, and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects".

The review of baseline information presented in Section 5 identified a range of issues across the town centre. A summary of these issues is presented in Table 6-1 below.

Table 6-1: Key issues identified in the environmental baseline.

Topic	Key issues
Landscape and visual amenity	• Maintaining the characteristics of the borough landscape, particularly the High Weald National Landscape that is under threat from increasing development proposals. • Maintaining the historic characteristics of townscapes across the borough.
Biodiversity, flora and fauna	• Sensitive designated sites under threat from increasing rates of development. • Isolation and fragmentation of open spaces and gardens contributing to loss of habitat connectivity from changing land use demands. • Pollution and climate change.
Water environment	• Fluvial flood risk from the River Medway and tributaries. • Water supply concerns under future climate scenarios within the next decade. • No WFD water bodies in the borough have good ecological status, and heavily modified water bodies, which are the majority in the borough, are unable to meet this.

Topic	Key issues
Land	• Development on brownfield land or land at risk of contamination could result in the release of contaminants into groundwater or surface waters. • Land use pressures on very good quality agricultural land, which the borough predominantly consists of, due to increasing rates of development.
Historic environment	• Valuable heritage assets are vulnerable to deterioration as a result of increasing development causing adverse impacts to their historic setting and character. • Risk of adverse impacts to the historic environment as a result of more frequent and intense flood events caused by climate change.
Population and human health	• Significant geographical barriers to services for people in rural areas. • The borough predominantly falls within the lower end of deciles for training, skills and employment in rural areas, highlighting notable education inequality.
Economy and employment	• Rising costs to local businesses causing a barrier to growth and economic expansion. • Loss of appropriate employment sites in economic centres that are suitable for the demands of modern working. • Decline of the high street due to reduced footfall.
Infrastructure	• There is a deficit of recreational open green space for the borough population. Many large green space areas are for private use and may not be accessible to many residents due to the cost and distance from rural populations. • Some sports and recreational facilities in the borough require renovation or investment into new facilities, particularly for the teenage age group. • The usage of sustainable modes of transport is relatively low in the borough and more investment is necessary to encourage public transport uptake and active travel.
Climate change	• The area is vulnerable to more extreme weather events and temperatures under future climate scenarios, and this has the potential for an array of serious impacts across sectors.

Topic	Key issues
Air quality and noise	- Air pollution is a concern within Royal Tunbridge Wells and surrounding a number of properties designated as an AQMA within Hawkhurst. - Some areas of noise concern within smaller settlements of the borough.

6.2 Scoping of SEA topics

Following a review of the baseline data it has been possible to focus the assessment on the key issues within the borough, and the scope of this assessment it shown in Table 6-2.

Table 6-2: Scoping of sustainability issues 'in' or 'out' of the SEA.

Topic	Scoped In/Out	Reasoning
Landscape and visual amenity	In	Potential new housing development across the borough may be detrimental to landscape character, particularly due to a significant proportion of the borough being designated within the High Weald National Landscape. The London Metropolitan Green Belt that covers around 21% of the borough will be subject to increased land use pressures as a result of the natural expansion of the Royal Tunbridge Wells urban area. This must be protected, to maintain the open landscape character and avoid merging of settlements. Due to expansion of the primary settlements, particularly Royal Tunbridge Wells, the historic townscape identity is under threat from development pressures and expansion of the urban area. Climate change could be expected to alter the condition and character of this landscape, due to increases in annual temperatures and changes in rainfall patterns, which may affect vegetation, hydrology and the heavily forested landscape. The Bewl Water reservoir, which is valued by local people as an area of recreation, may be vulnerable to changing water levels under these conditions.

Topic	Scoped In/Out	Reasoning
Biodiversity, flora and fauna	In	Human related impacts on priority habitat areas as a result of increasing rates of development and associated pressures. The approximately 1,100 homes required in the borough per year to meet new government targets will have significant impact on habitats, particularly deciduous woodland which is prominent in urban areas across the borough. Loss of high quality habitats that can provide benefits to people and wildlife conservation. There is a need to reduce pollution and improve water quality as well as provide corridors for wildlife movement. Need to recognise the wider benefits from natural capital and ecosystem services and minimising impacts with provision of net gains through development.
Water environment	In	Promotion of the sustainable use of water resources is necessary, to meet future growth in demand and impacts of climate change across the borough as population and housing growth is predicted to increase water demand in an area expected to be in supply deficit by 2030. Climate change increasing drought conditions and extreme weather events will impact available water supply and increase flood risk, raising associated economic costs. New development should be directed away from areas at medium and high risks of flooding and should consider potential economic contribution to surface water runoff. The borough is particularly vulnerable to significant fluvial flooding from the River Medway and its tributaries. Efforts to reduce flooding in the borough should be considered and allocations should be avoided in areas of fluvial or surface water flood risk in order to reduce vulnerability to flooding.

Topic	Scoped In/Out	Reasoning
Land and contamination	In	The long-term protection, improvement and sustainable management of soil quality and quantity, the preservation of best and most versatile soils (Grade 1, 2 and 3 ALC) is nationally important, and there is a substantial area of this within the borough. There is also agricultural influence on the natural environment and landscape in the borough. This plays an important role in shaping the local landscape and supporting agricultural industries. Urban land covers a smaller but still significant area of the borough across its major settlements. As the population increases with new proposed developments, these areas can be expected to be under more pressure to expand, and therefore more agricultural land is likely to come under threat. Brownfield land should be maximised for development opportunities where possible to meet housing need. This should include remediation of contaminated land, such as previous landfill sites, to reduce risk of surface runoff pollution from these sites. Sustainable management of waste should be a priority in the borough to reduce the amount of waste sent to landfill and improve recycling rates.
Historic environment	In	Future development in the borough to meet housing and development demand may present risks to the heritage value and character of towns and settlements as well as archaeological features/remains. The deterioration of statutory designated heritage assets throughout the borough, and particularly the Heritage at Risk Register assets, may be exacerbated in the future due to pressures associated with climate change and flooding, as well as new development. These issues need to be effectively managed to ensure the borough's cultural heritage is protected. Historic areas of the borough are popular tourist destinations, such as Royal Tunbridge Wells Conservation Area and the Spa Valley Railway, and heritage-based tourism is promoted. Possible conflicts with high visitor numbers and the conservation of heritage may need to be appropriately managed.

Topic	Scoped In/Out	Reasoning
		The impacts of development should be considered for APAs across the borough.
Population and human health	In	An increase in housing development as well as financial pressures on the council will raise challenges for delivering public health services across the borough. Maintenance of, and accessibility to, local services in rural areas. Improvement of education, skills and training attainment, particularly in rural areas. There is notable skill inequality across the borough.
Economy and employment	In	There is a notable deficit of employment space within the borough, particularly in town centres. A large amount of office space has been changed into residential housing or other use types or is derelict and requires significant renovation to meet the needs of modern day working. Retail zones, particularly high streets, are experiencing reduced footfall due to changes in shopping patterns. Further investment is needed in town centres such as public realm improvements and increased modern retail options to attraction more footfall and boost spending in line with present retail demands. It is necessary to improve employment opportunities to reduce unemployment rates. Residents largely commute to work by private vehicle which can put pressures on the road network, air quality and carbon emissions. Alternatives methods of transport for commuting should be prioritised.

Topic	Scoped In/Out	Reasoning
Infrastructure	In	Tunbridge Wells is a car dependent borough, likely due to its rural nature. Despite extensive bus networks, this is not often the chosen mode of transport for many people. Much of the borough is also not served by the rail network. Public transport does not currently support the expected levels of growth and increases in demand within the borough to move towards reducing carbon emissions and reducing pressure on the road network. There is a deficit of publicly accessible open green space in the borough, by approximately 11 hectares. Parks and recreational areas should expand to address the additional expected population growth. Leisure and sports facilities, particularly for teenagers and young people, require further development and renovation. Developer investments are valuable in addressing this.
Climate change	In	Should climate predictions be realised, there is the risk of significant adverse impacts on public health, infrastructure, built heritage and natural environment within the borough. Increased temperatures and extreme weather events have the potential to impact upon public health during heatwaves and flood events. This includes increased risk of outbreaks of disease, and potential increased risk of contamination. Increased fluvial flood risk from both the River Medway and its tributaries, and surface water runoff from the local drainage and sewerage infrastructure is likely to increase because of greater winter rainfall and more intense storm events. This has the potential to adversely impact upon utility, residential, industrial and transport infrastructure, causing significant economic damages as well as social and public health implications. Species and habitat abundance and richness will become threatened because of changing habitats, drier soils and increased competition from invasive non-native species throughout the region's watercourses and other important habitats. There is also increased risk of soil erosion from agriculture, potentially having adverse impacts on agricultural productivity, aquatic ecosystems and air quality. Energy demand and consumption is likely to rise because of increased population and development resulting from economic

Topic	Scoped In/Out	Reasoning
		growth and increased mobility. Renewable energy generation could help meet government targets and diversification of agricultural land. However, this can lead to conflicts between renewable energy generation and other land uses, as well as issues in relation to impacts on landscape quality and character, recreation and amenity, and biodiversity. The transport sector is likely to have an increasingly greater proportional input into GHG emissions in the borough as associated emissions reductions have been considerable smaller than for other sectors. This has the potential to offset some of the reductions from other emissions sources due to energy efficiency measures and use of cleaner technology.
Air quality and noise	In	There is currently one AQMA in the borough, in Hawkhurst. New and existing development should avoid contributing to, being put at risk from, or being adversely affected by unacceptable levels of air pollution within the AQMA and areas of air quality concern elsewhere in the borough. Defra have outlined a number of Noise Action Planning Areas in Tunbridge Wells, particularly surrounding some arterial routes through the borough. The risk of noise disturbance from new development should be mitigated through development management policies in the Local Plan Review.

7 Proposed SEA Framework and Methodology

7.1 Introduction

The SEA framework is used to identify and evaluate the potential sustainability issues associated with the implementation of the Local Plan Review. The framework comprises a set of SEA objectives that have been developed to reflect the key sustainability issues identified through the baseline information review. These objectives are supported by a series of criteria, which are used to measure the potential significance of the sustainability issues and can be used to inform monitoring following the implementation of the Local Plan Review.

7.2 SEA Objectives

The SEA framework is used to identify and evaluate the potential environmental issues associated with the implementation of the Local Plan Review. The list below summarises the purposes and requirements of SEA objectives, sub-objectives, and criteria:

- Objective: Provide a benchmark 'intention' against which environmental effects of the plan can be tested. They need to be fit for purpose.
- Sub-objective: Aid the assessment of impact significance. Provide a means of ensuring that key environmental issues are considered by the assessment process.
- Potential criteria: Provide a means of measuring the progress towards achieving the environmental objectives over time. They need to be measurable and relevant and ideally rely on existing monitoring networks.

7.3 SEA Framework

The draft SEA objectives are outlined in Table 7-1 below. These objectives are currently in draft form and can be refined or revised in response to comments received during the consultation phase of this SEA Scoping Report. These objectives have been developed based on key considerations and potential effects identified in Section 5.

Table 7-1. Proposed SEA Framework.

SEA Topic	Objectives	Sub-objective	Potential criteria
Landscape and visual amenity	1. To protect and enhance the integrity and quality of the borough's historic towns and rural landscapes, maintaining distinctive townscapes and natural landscapes.	Protect and enhance landscape character areas in accordance with management objectives. Manage and mitigate the adverse effects of climate change on the landscape character. Development is sympathetic with the character of towns and local communities.	Change in the characteristics of landscape outlined in the High Weald AONB Management Plan. The condition and quality of new characteristics introduced to the environment.
Biodiversity, flora and fauna	2. Protect and enhance biodiversity, habitats and species.	Protect and enhance designated sites. Protect and enhance priority habitats and species. Provide opportunities for better access to wildlife and green spaces. Deliver schemes that promote habitats and species resilience and adaptability to the effects of climate change.	Change in the characteristics of landscape outlined in the High Weald AONB Management Plan. The condition and quality of new characteristics introduced to the environment.
Water Environment	3. Protect and improve the quality and quantity of the water in the Borough's surface and groundwaters.	Contribute to the achievement of WFD objectives. Minimise pollution and modification of watercourses. Encourage sustainable and efficient	Percentage of water bodies achieving 'Good' WFD status. Percentage of HMWB achieving GEP. Number of schemes contributing to the

SEA Topic	Objectives	Sub-objective	Potential criteria
		management of water resources. Protect and improve drinking water quality.	achievement of WFD objectives. Number of pollution incidents. Water efficiency in new developments. Meeting of water leakage targets. Number of homes with water smart meters installed.
Water Environment	4. Reduce the risk of flooding to existing communities and ensure no new developments are at risk of flooding.	Prevent development that is inappropriate to the Flood Zone. Prevent development that will adversely affect flood risk. Reduce and manage surface water flooding.	Number of developments accompanied by a Surface Water Management Plan. Number of flood defence schemes planned/approved. Planning applications that are approved / refused due to flood risk concerns. Extent of surface water flood risk. Number of Sustainable Urban Drainage Systems implemented in new developments.
Land and contamination	5. Protect the borough's land quality and soil resources.	Reduce soil erosion and protect and enhance soil quality and quantity. Minimise the loss of BMV ALC land. Promote the use of brownfield land for development where possible. Increase the remediation of contaminated land and	Area of BMV ALC land within the borough. Number of land remediation schemes. Approved planning applications on brownfield sites.

SEA Topic	Objectives	Sub-objective	Potential criteria
		regeneration of brownfield sites.	
Land and contamination	6. Encourage sustainable management of waste in the borough.	Reduce waste and increase re-use, recycling and energy produced of waste. Improve on the proportion of waste that is sent for recycling. Reduce volume of waste created per household.	Waste to landfill, recycling and composting rates. Volume of waste created per household.
Historic environment	7. Conserve and enhance the historic environment, heritage assets and their settings.	Conserve and enhance designated heritage features. Maintain and enhance the character and distinctiveness of Conservation Areas and settlements. Promote high-quality design that is sympathetic with historic townscapes and settings. Manage the risk of encountering unknown archaeology.	Planning permissions granted / refused that improve / adversely affect the setting of a designated heritage asset. Loss or deterioration of heritage assets. Number of heritage assets on Heritage at Risk Register. Number of planning applications where archaeological investigations were required prior to planning approval.

SEA Topic	Objectives	Sub-objective	Potential criteria
Population and human health	8. Reduce social deprivation	Increase community cohesion. Increase employment in deprivation hotspots. Improve participation and outcomes in further education and skills development. Maintain local service access and reduce local service deprivation in rural areas.	Differences in education levels of a population between LSOAs. % of 16 year olds achieving 5+ GCSEs grade 4-9. Percentage of population that have attained a qualification of NVQ2 and above. Participation in further education and skills per 100,000 people aged 19 or over. IMD findings for education, barriers to services and health.
Population and human health	9. Promote a healthy and active lifestyle.	Increase access to high quality healthcare facilities. Promote and improve recreational and leisure opportunities to access open space. Increase regular participation in physical activities and sport.	Life expectancy rates. Self-reported measures of people's overall health and wellbeing Death rates for cancer, circulatory disease, accidents and suicides. All-age all-cause mortality rates. Obesity levels. IMD health and disability scores.

SEA Topic	Objectives	Sub-objective	Potential criteria
Economy and employment	10. Promote a sustainable and diversified economy and improve skills and employability.	Promote retention of existing jobs and create new employment opportunities. Increase diversity in the range of job opportunities. Ensure an adequate supply of a range of sites in terms of types and quality of employment uses. Improve access to opportunities for education, learning and skills training for all sectors of the community. Support the creation of flexible jobs to meet the changing needs of the population.	Amount of completed retail office and leisure development. New business registration rates. Employment rates. Proportion of economically active people unemployed. Average earnings. Proportion of 18-24 year olds enrolled in training, full time education or employment. No. of residents attending university. Business surveys of staff/skills shortages.
Infrastructure	11. Increase access to public services in the borough.	Improve access to local facilities, including healthcare and schools. Improve public transport services in the rural areas of the borough. Enhance formal green space and green infrastructure assets. Maintain and enhance local services in rural areas.	Number of people who have adequate access to public services. Frequency of bus services through rural areas. Hectarage of formal green space. Counts of business and services in rural areas. Number of public green spaces and their location in the borough. Reduction in areas experiencing high deprivation

SEA Topic	Objectives	Sub-objective	Potential criteria
		Improve active travel routes to support the take up of walking and cycling as a primary transport method.	and limited access to open space in the borough.
Climate change	12. Reduce the impacts of climate change and reduce GHG emissions.	Promote measures that minimise GHG emissions, domestic, industrial and transport emissions. Promote the development of renewable energy generation. Minimise the likely impacts of climate change through promotion of appropriate adaptation measures in new development. Promote measures to reduce the need to travel by car.	GHG emissions. New development achieving 'good', 'very good' or 'excellent' BREEAM or EcoHomes rating. Proportion of total electricity consumption from renewable sources. Energy and water use per household. Condition of designated sites. Peak traffic flows. % change in number of people using public transport and/or active travel.
Air quality	13. Protect local air quality	Maintain and improve local air quality. Reduce the impacts on air quality from transport. Mitigate against the uses that generate NO₂ or other particulates. Minimise increase in traffic congestion.	Rate of transport modal shift across the borough. Exceedances of air quality objectives. Nitrogen dioxide, sulphur dioxide and particulate emissions. Percentage of mortality in the borough related to air pollution. Reduction in AQMAs.

7.3.1 Compatibility

Due to the nature of the assessment, incompatibilities will exist between SEA objectives. For example, meeting the requirements of the sub-objective 'protect and enhance landscape character' could be incompatible with sub-objective 'maintain enhance local services in rural areas'. The following definitions regarding compatibility/ incompatibility have been applied to this assessment:

- Compatible: both SEA objectives can potentially be achieved without problems or conflict. The achievement of one SEA objective does not prevent or make difficult the achievement of another.
- Incompatible: both SEA objectives may not be achieved without problems or conflict. The achievement of one SEA objective prevents or makes difficult the achievement of another.
- Where no interdependencies are identified, the compatibility score is left blank.

A compatibility assessment of the SEA objectives has been undertaken and is shown in Figure 7-1

1													
2	✓												
3		✓											
4		✓	✓										
5	✓	✓	✓										
6		✓	✓		✓								
7	✓			✓	✓								
8				✓									
9	✓	✓	✓		✓	✓		✓					
10								✓					
11	X	X		✓	X			✓		✓			
12	✓	✓		✓	✓	✓		✓	✓				
13		✓			✓				✓			✓	
Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13
	Landscape and Visual	Biodiversity, Flora and Fauna		Water Environment		Land and Contamination	Historic Environment		Population and Human Health	Economy and Employment	Material Assets	Climate Change	Air Quality

Figure 7-1. Compatibility Table of SEA Objectives.

7.4 Geographical and temporal scope of the SEA

The geographical scope of the SEA varies by SEA topic. Immediate and direct impacts and effects will be identified within the study area (see Figure 2-1). Other direct (not immediate) impacts and effects will be considered over the distances which are relevant to those effects. This will be defined at the assessment stage.

The temporal scope of the SEA will attempt to mirror the Local Plan Review and consider impacts up until 2044. It is not possible for the SEA to assess potential effects accurately at these timescales, and it will rely on many assumptions. Assumptions, uncertainties, and limitations will be documented in the Environmental Report.

8 Assessment approach

8.1 Developing alternatives

The SEA Regulations require an assessment of the Local Plan Review and its 'reasonable alternatives'. To assess reasonable alternatives, the different strategy options for delivering the Local Plan Review will be developed and assessed at a strategic level against the above SEA objectives and environmental baseline detailed in Section 5. The results of this assessment will be used to inform the decision-making process in choosing a preferred way of delivering the Local Plan Review.

The Local Plan Review objectives and measures are not yet sufficiently developed. Therefore, they will be assessed at a later stage, with details of each provided in the Environmental Report, as the Local Plan Review progresses through its different stages of production.

The SEA will also consider a 'do nothing' scenario (i.e. how the situation would develop in relation to each environmental receptor without implementation of the Local Plan Review).

8.2 Types of effect to be considered

The Local Plan Review (including alternative options) will be evaluated in light of its potential cumulative, synergistic and indirect environmental effects on the different SEA receptors selected for further assessment. The assessment of these environmental effects will be informed by the baseline data collected at this scoping stage, professional judgement and experience with other development plans related SEAs as well as an assessment of national, regional and local trends.

Throughout the assessment the following will apply:

- Positive, neutral and negative impacts will be assessed, with uncertain impacts highlighted;
- The duration of the impact will be considered over short, medium and long term;
- The reversibility and permanence of the impact will be assessed, such as impacts which can be mitigated against/ restored over time; or completely irreversible changes to the environment; and
- In-combination effects will also be considered.

The significance of effects upon each of the SEA objectives will then be evaluated and used to inform option selection. The significance of effects will be scored using the six-point scale summarised in Table 8-1 below. If there is high uncertainty regarding the likelihood and potential significance of an impact (either positive or negative) it will be scored as uncertain.

Where possible, the 'worst case' impact will be assessed and illustrated, with commentary how the effect may be better or improved through action.

The SA for the adopted Local Plan used an eight-point scale to determine significance of effects of that plan. The scale used in this SEA has been slightly adjusted to include mixed

and uncertain affects, as well as a not applicable marker, due to the proposed changes to conducting SEA away from social and economic focus. Descriptors of each impact significance scoring have been provided in Table 8-1 below.

Table 8-1. Impact scoring table for SEA objectives.

Impact significance	Description	Symbol
Significant positive effect	The option contributes to the achievement of the SEA objective and is likely to deliver enhancements.	++
Minor positive effect	The option contributes partly to the achievement of the SEA objective but not completely.	+
Negligible effect	There is no clear relationship between the option and/or the achievement of the SEA objective.	0
Minor negative effect	The option partially detracts from the achievement of some of the elements of the SEA objective.	-
Significant negative effect	The option detracts from the achievement of all elements of the SEA objective.	--
Mixed effect	The option could contribute and detract from the achievement of the SEA objective.	+ / -
Effect uncertain	It is uncertain how the option will impact the achievement of the SEA objective.	?
Policy is not relevant to the SEA objective.		N/A

8.2.1 Transboundary issues

For many authorities, the geographical scale of particular issues means that they relate closely to surrounding area. In this report, transboundary issues have been captured by the establishment of a 2km buffer zone. To help characterise the scope further, some of these 'transboundary' issues have been identified at a wider scale:

- Risk of fluvial flood risk is prevalent in the north of the borough, surrounding Paddock Wood from the River Medway and its tributaries, but also impacts the surrounding area to the north of the borough. Any work to improve flood defence efforts is likely to have transboundary impacts.
- At a regional scale, South-East Water have identified that the region will be at a water supply deficit by 2030.
- The sensitivity of the High Weald National Landscape designation which spans several authority boundaries.
- The ecological receptors of internationally designated sites in proximity of the borough, for example the Ashdown Forest SAC and SPA 5km from the site, and Dungeness, Romney Marsh and Rye Bay Ramsar, SAC and SPA 11km south east of the borough.
- There are infrastructure pressures from residents across boundaries. Many Tunbridge Wells pupils travel outside the borough to schools in other areas, whilst many pupils also travel into the borough from surrounding areas of Kent

and East Sussex, in particular to access the grammar schools within the borough. Tunbridge Wells Hospital (Pembury) is used by the entire West Kent sub-region and GP practices are also stressed, particularly in rural regions and areas such as Paddock Wood on the edge of the borough.

- Road networks are experiencing notable transboundary congestion, particularly the A21 and A26 corridor. There is increasing demand on transboundary bus services, and it is also important to note that many users within the borough are using nearby rail stations such as Tonbridge and Malling.

8.3 SEA Monitoring

Once the Local Plan Review is assessed, the suggested criteria (presented in the SEA Framework, Table 7-1) will be reviewed to identify appropriate indicators and relevant SEA monitoring for the strategy. The purpose of SEA monitoring is to identify at an early stage any unexpected or different effects from those predicted by the SEA and enable early intervention or mitigation of any adverse effects. The indicators will be reviewed for effectiveness at monitoring predicted effects and also uncertainties in the assessment, and targets will be identified where possible for each indicator a response or intervention would be needed.

9 Next steps in the Strategic Environmental Assessment process

9.1 Consultation

A key aspect of the SEA process is consultation. The SEA Regulations require government bodies with environmental responsibilities to be consulted on the scope and level of detail of the information which must be included in the final SEA Report; and these bodies and the public need to be consulted on the final SEA report.

The SEA process provides a mechanism to ensure that stakeholder engagement requirements are achieved by providing interested parties/ organisations and the public an opportunity to inform the process and comment on decisions taken. Stakeholder engagement also ensures that sustainability issues, constraints and opportunities are identified and assessed at an early stage of the project.

This draft Scoping Report will be subject to a five-week consultation period with statutory consultation bodies within England (Natural England, Historic England and the Environment Agency), after which the comments received will be considered in the Environmental Report. The Council will also conduct a Scoping Review Consultation, as required under the Local Plan Making Regulations 2026, which is often a technical consultation with statutory bodies, but the Council may publish the Scoping Report online and invite wider comment. The Environmental Report will be the next output in the SEA process, and it will document the assessment of the Local Plan Review against the SEA objectives.

9.2 The Environmental Report

Following a consultation period on the SEA Scoping report, the Local Plan Review will be developed concurrently with the SEA, following the framework outlined above. The results of this will be summarised in an Environmental Report. A proposed structure for the Environmental Report is outlined in the Table 9-1 below.

Table 9-1: Proposed structure of the Environmental Report.

Section	Information to be included
Non-Technical Summary	Non-technical summary of the SEA process.
Methodology	Details of who carried out the SEA, how, who was consulted, and when. Difficulties in collecting data or assessment.
Background	Purpose of the SEA and integration with the Local Plan Review.

Section	Information to be included
Baseline characteristics	Description of significant sustainability effects of the Local Plan Review policies. Assessment matrix for each policy/option. How problems were considered in developing the policies and choosing the preferred alternatives. Other alternatives considered, and why these were rejected. Proposed mitigation and enhancement measures to deliver SEA objectives.
Sustainability Framework	SEA objectives and appraisal criteria
Plan issues and alternatives	Description of significant sustainability effects of the Local Plan Review policies. Assessment matrix for each policy/option. How problems were considered in developing the policies and choosing the preferred alternatives. Other alternatives considered, and why these were rejected. Proposed mitigation and enhancement measures to deliver SEA objectives.
Implementation	Links to project environmental impact assessment, design guidance etc. Proposals for monitoring and reporting.

10 Appendix A - Plans, Policies and Programmes: Detailed Review

10.1 International

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Aarhus Convention 1998	Establishes several public rights, including access to environmental information held by public authorities, the right to public participation in environmental decision-making and access to justice in environmental matters regarding community institutions and bodies.	The preparation process of the Local Plan Review and SEA will need to have regard to the convention through ensuring effective public participation and ensuring the accessibility of environmental information relating to the Plan.
Strategic Environmental Assessment (SEA) Directive (2001/42/EC)	This Directive sets out a procedure that must be undertaken when assessing a plan or programme to which the procedure that must be undertaken when assessing a plan or programme to which the procedure applied.	The SEA and Local Plan Review will need to have regard to the relevant UK legislation that has been transposed from these EU Directives.
EU Directive on the conservation of wild birds (79/409/EEC amended to 2009/147/EEC)	The Directive's key objective is the conservation of wild birds and their habitats, including identifying Species Protection Areas (SPAs).	The Local Plan Review will need to have regard to the relevant UK legislation that has been transposed from these EU Directives.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
EU Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC)	The Directive's key objective is to ensure the conservation, maintenance and restoration of natural habitats and wild fauna/flora.	The Local Plan Review will need to have regard to the relevant UK legislation that has been transposed from these EU Directives.
EU Convention for the protection of Archaeological Heritage (1992)	The Convention established legal standards for Europe to be met by national policies for the protection of archaeological assets. The revision makes conservation and enhancement of archaeological heritage one of the goals of urban and regional planning policies.	The Local Plan Review should have due regard to the archaeological heritage through the development of its proposals.
EU Air Quality Framework directive on ambient air quality (2008/50/EC, 2004/107/EC, 2015/1480/EC)	The EU Directive's key objective is the improvement and management of ambient air quality.	The Local Plan Review will need to have regard to the relevant UK legislation that has been transposed from these EU Directives.
EU Landscape Convention (Florence Convention) 2000	This Convention is the first international convention to focus, specifically on landscape. It promotes landscape protection, management and planning and European co-operation on landscape issues. It highlights the importance of development landscape policies dedicated to the protection management and creation of landscapes and establishing procedures for the general	The Local Plan Review will need to ensure the protection, management and creation of landscape through its policy making and development strategy.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
	public and other stakeholders to participate in policy creation and implementation.	
United Nations Framework Convention on Climate Change, Paris Agreement (2016)	The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping the global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Paris agreement effectively supersedes the Kyoto Protocol (1997).	The Local Plan Review and SEA should work to deliver carbon reductions locally to contribute to the achievement of the Paris Agreement goals at a national and international level.
European Sustainable Development Strategy (2006)	This strategy provides an EU-wide policy framework to deliver sustainable development, i.e. to meet the needs of the present without compromising the ability of future generations to meet their own needs.	The Local Plan Review needs to build around these principles, and the economic, social and environmental consequences of all the policies and sites need to be examined in a coordinated manner through the Strategic Environmental Assessment.
Transforming Our World: The 2030 Agenda for Sustainable Development (2015)	Agenda signed in 2015, the 2030 Agenda takes all of the goals set by Agenda 21, and re-asserts them as the basis for sustainable development, and adds on 17 agreed goals revolving around the same concepts.	The Local Plan Review should consider the sustainable development goals, and they should be reflected in the SEA as many relate to spatial planning.

10.2 National

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations, 2019	The aim of this regulation is to designate zones in which ambient air will be protected by limiting the concentrations of pollutants within them.	The Local Plan Review should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. Policies should ensure that new development is appropriate for its location considering the likely effects of pollution on health, as well as the potential sensitivity of the or wider area.
The air quality strategy for England 2023	Strategic framework for local authorities and their partners setting out their powers, responsibilities and actions they are to take to meet long term air quality goals. The strategy sets out air quality standards, objectives and measures for improving air quality over a 5-year period.	The Local Plan Review and SEA should take into account the standards and objectives for air quality set out in this framework.
Air Quality (England) Regulations 2000	These regulations set the standards and objectives for seven pollutants associated with local air quality.	The Local Plan Review and SEA should take into account the standards and objectives for air quality outlined in the regulations.
Ancient Monuments and Archaeological Areas Act 1979	Under this legislation Scheduled Monuments are protected based on their archaeological or historical interest.	The should consider how the Local Plan Review could negatively impact Scheduled Monuments and seek to mitigate or minimise these impacts.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Clean Air Strategy (2019)	The Clean Air Strategy provides a way in which the UK will tackle all sources of air pollution with the main aims of making UK air healthier to breathe, protecting nature and boosting the economy.	The SEA should consider the impact the Local Plan Review may have on air quality. Policies should ensure that development contributes to and complies with relevant limited values for pollutants, including AQMAs.
Climate Change Act 2008	The act established a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels. The act also sets requirements for the government which are fulfilled by the UK climate change risk assessment and the national adaption programme report.	To comply with UK legislation, the Local Plan Review should minimise greenhouse gas emissions.
Contaminated Land (England) Regulations 2006	These Regulations, which apply to England only, also set out provisions relating to the identification and remediation of contaminated land under Part 2A of the Environmental Protection Act 1990. Defra produced contaminated land statutory guidance in 2012 to explain how local authorities should implement the regime on contaminated land (Defra, 2021).	The SEA should consider how the Local Plan Review has included measures relating to the identification of contamination risks and guard against land contamination.
Control of Pollution Act 1974	An Act to make further provision with respect to waste disposal, water pollution, noise, atmospheric pollution and public health; and for purposes connected with the matters aforesaid.	The SEA should include objectives relating to the provision of measures to avoid or control pollution.
Countryside and Rights of Way Act 2000	The Countryside and Rights of Way Act 2000 (CROW Act) gives a public right of access to land mapped as 'open country' (mountain,	The implications on rights of way, access and recreation should be considered in the preparation of the Local Plan Review.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
	moor, heath and down) or registered common land. These areas are known as 'open access land'.	
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	The 25-Year Environment Plan sets out planned government action to deliver nature recovery. This covers several areas including climate change mitigation and adaptation, on which it outlines plans to continue to reduce greenhouse gas emissions, incorporate climate change in all policy, programme, and investment decisions and implement an effective National Adaptation Programme. The Plan should help achieve targets set out in the plan including reducing risk harm environmental hazards and mitigating and adapting to climate change. The plan impacts upon clean air, clean and plentiful water, thriving plants and wildlife, using resources from nature more sustainably and efficiently and enhancing beauty, heritage, and engagement with the natural.	Plans should take a proactive approach to mitigating and adapting to climate change and policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. New development should be planned for in a way that avoids increased vulnerability to climate change. The Local Plan Review should help reduce greenhouse gas emissions; avoid adverse impacts, and enhance where possible, biodiversity, air quality, landscape, and heritage; and not result in increased flooding in the borough.
The Environmental Improvement Plan 2023 (First Revision of the 25 Year Environment Plan)	The first revision of the Environmental Improvement Plan builds on the 25 year plan's vision with a new plan setting out how the government will work with landowners, communities, and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress.	As well as the above, the SEA should consider how the Local Plan Review's environmental outcomes achieve the interim targets set out in the revised plan.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Environment Act 1995	This act required all local authorities to regularly review and assess air quality in their areas, and to determine whether the air quality objectives are likely to be achieved.	The Local Plan Review should take into account the information captured in regular air quality monitoring.
Environment Act 2021	The Environment Act has been implemented with the intention of protecting and enhancing the environment of future generations. This Act brings many of the objectives in the 25-year environment plan into UK law, setting legal targets to half species declines and implementing laws to ensure water companies deliver reductions in the frequency of sewerage discharges.	The SEA Framework and Local Plan Review will align with the UK's environmental objectives in the preparation and assessment of the Plan to help safeguard the area and resources for future generations.
Environmental Noise (England) Regulations 2006	The Environmental Noise (England) Regulations 2006 (as amended) transpose the Environmental Noise Directive into domestic law for England. These Regulations apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas (agglomerations).	The SEA should include an objective to reduce the impact of noise pollution on air quality.
Environmental Protection Act 1990	The Environmental Protection Act 1990 (EPA 90) contains the key provisions in relation to the management of controlled waste. Part II of the EPA 90 deals specifically with the deposit of waste to land and associated offences.	The SEA Framework should contain an objective in relation to waste minimisation. The Local Plan Review should consider how developments remediate and mitigate despoiled, degraded, derelict, contaminated land, where appropriate.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Equality Act 2010	The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations.	The SEA Framework will include objectives, indicators and targets for equality and access to amenities and facilities.
Health and Social Care Act 2012	The main purpose of the Health and Care Act is to establish a legislative framework that supports collaboration and partnership-working to integrate services for patients. Among a wide range of other measures, the Act also includes targeted changes to public health, social care and the oversight of quality and safety.	The SEA Framework should include objectives, indicators and targets which address health issues and deprivation and seek to reduce health inequalities. The Local Plan Review needs to recognise the role that development and planning can play in enhancing the quality of life in the borough.
Historic Buildings and Ancient Monuments Act 1953	An Act to provide for the preservation and acquisition of buildings of outstanding historic or architectural interest and their contents and related property. The Act makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).	The SEA Framework should include objectives which consider the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. The Local Plan Review should include policies related to the Parks and Gardens and historic assets in and around the borough.
Housing and Planning Act 2016	The Act makes provisions for Right to Buy, Pay to Stay, Starter Homes, and the private rental sector. It contains a range of measures to expand homeownership, reform housing management	The SEA will not include an objective on housing as this is a key focus of the Local Plan Review. However, the Local Plan Review and SEA should have regard to

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
	and the planning process, and increase housing supply to tackle the housing crisis.	offering a diverse mix of housing tenure, including affordable homes.
The Levelling-up and Regeneration Act 2023	This Act aims to improve the planning system and encourage the development of new homes.	The Local Plan Review should also ensure it is encouraging the development of new homes in order to meet borough housing needs.
Localism Act 2011	The aim of the act is to facilitate the devolution of decision making powers from central government control to individuals and communities.	The Local Plan Review should include policies that enable local people, charities, social enterprises and voluntary groups to work with the Local Authority and ensure that planning policy decisions take full account of the views that are expressed.
Local Nature Recovery Strategies (LNRS)	The Secretary of State for Environment, Food and Rural Affairs has appointed 48 responsible authorities to lead on preparing a local nature recovery strategy for their area. Together these 48 strategy areas cover the whole of England. These local nature recovery strategies shall be aimed at helping people to see where action to recover nature in their area would be most effective. They will set out actions of nature recovery in their area such as creation of wetlands, and planting of trees and hedgerows. Authorities are required to review and update their strategy every three to ten years.	Hertfordshire, as the appointed responsible authority, is required to produce a Local Nature Recovery Strategy. The SEA / Local Plan Review shall have regard for this LNRS.
The Flood and Water	Aims to make improvements to both flood risk management and the way water resources are managed.	The Local Plan Review should include policies that define clearer roles,

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Management Act 2010		responsibilities and standards for the creation of sustainable drainage. The SEA should include an appraisal objective to improve flood risk management and protect water resources.
National Framework for Water Resource 2025: water for growth, nature and a resilient future.	The framework provides a strategic direction to long-term water resource planning built on a shared vision to leave the environment in a better state than it was found, improve the nation's resilience to drought, minimise interruptions to water supplies for all users of water and support growth while underpinning a thriving economy.	The SEA should consider the Local Plan Review's impact on water resources.
National Bus Strategy (2021)	The national strategy 'bus back better' sets out the vision and opportunity to deliver better bus services for passengers across England, through ambitious and far-reaching reform of how services are planned and delivered. It all sets out the expectations for local transitions to zero emission bus fleets. This required Local Transport Authorities, in this case Kent, to produce Bus Service Improvement Plans (BSIPs) to identify targets for achieving measured improvements to the bus network	The SEA should consider how the Local Plan Review encourages the public away from private vehicle use in the borough.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Natural Environment and Rural Communities (NERC) Act 2006	The Act establishes an independent body – Natural England – responsible for conserving, enhancing, and managing England’s natural environment for the benefit of current and future generations. The Act makes provision in respect of biodiversity, pesticides harmful to wildlife and the protection of birds, and in respect of invasive non-native species. It alters enforcement powers in connection with wildlife protection and extends time limits for prosecuting certain wildlife offences.	The SEA Framework should include an objective to minimise impacts to the natural environment.
National Planning Policy Framework (2024)	The NPPF, most recently revised on 12 December 2024, sets the Government’s planning policies for England and how they should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. This framework must be considered when preparing the development plan alongside international obligations and statutory requirements.	The SEA and Local Plan Review considers the planning policies within the NPPF and takes these into account when identifying a preferred option.
National Planning Policy for Waste (2014)	The NPPW details the government's waste management policies for England.	The Local Plan Review should have regard to NPPW policies when making provisions for waste management.
National Parks and Access to the Countryside Act 1949	The Act provided a framework for the creation of National Parks and Areas of Outstanding Natural Beauty, Public Rights of Way and access to open land. The Act outlines Natural England's duties around designations.	The SEA and Local Plan Review shall recognise the importance of landscape and ecological designations.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Planning (Listed Buildings and Conservation Area) Act 1990	This document ensures that when deciding on a planning application for development that affects a listed building or its setting, a local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.	The SEA Framework will include an objective to conserve and enhance the historic environment in the borough.
Planning for the climate challenge? Understanding the performance of English local plans (2016)	Town and Country Planning Guidance for how to include climate change related issues in local planning policy.	The guidance will be used to inform the climate change objective of the SEA.
Planning and Infrastructure Act 2026	This Act is designed to modernise the planning and approval processes for major infrastructure and housing projects. It aims to reduce delays in decision-making, in order to allow developers, local authorities and national bodies to coordinate more efficiently on important projects that support economic growth and public infrastructure development.	The Local Plan Review policies should assist in developing more efficient decision-making processes for development proposals.
Health Equity and Public Health Strategy 2025-2028	The strategy covers the period 2020 to 2025 with priorities including promoting a healthier nation; working towards a fairer society; keeping the public safe; and strengthening the public health system. The strategy sets out how PHE will improve health and reduce health inequalities across the public health system in England and is updated every 5 years.	The SEA will have an objective to improve the local population's health and wellbeing.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Safeguarding Our Soils: A Strategy for England (Defra, 2009).	Strategy that promotes soil as a natural resource that provides essential services, including food production, water management and support for valuable biodiversity and ecosystems. As a large store of carbon, it also plays a vital role in the fight against climate change.	The Local Plan Review should set out policies that ensure adequate management of soils, including safeguarding soils from contamination by pollutants. The SEA should include an appraisal objective that aims to safeguard soils through appropriate management.
Securing the Future - the UK Government Sustainable Development Strategy (2005)	This strategy for sustainable development aims to enable all people to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. Also, this strategy places a focus on protecting natural resources and enhancing the environment.	The SEA will identify objectives relating to sustainable development, sustainable resource use and protecting the natural environment for assessing the potential impacts of the Local Plan Review.
Surface water management action plan (2018) (Updated 2021)	This surface water management action plan sets out the steps the government is taking, with the Environment Agency and others, to manage the risk of surface water flooding. It covers actions to both improve our understanding of the risks and strengthen delivery. These include: • Improving risk assessment and communication. • Making sure infrastructure is resilient. • Clarifying responsibilities for surface water management. • Joining up planning for surface water management. Building local authority capacity.	The SEA and Local Plan Review should consider actions related to surface water management; particularly where new development is proposed.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
The Carbon Plan (2011)	In 2011, the government set out scenarios on how it is going to meet the first four carbon budgets from 2008-2027. The Carbon Plan is a government-wide plan of action on climate change, including domestic and international activity. The plan represents ongoing and planned cross-Government action on climate change with specific deadlines providing for both internal accountability and public transparency. The three main objectives are: Transforming the generation of energy by moving towards low carbon alternatives; changing the way how buildings are heated by better insulation the use of low carbon energy alternatives; changing the transportation sector by means of better public transport, reducing emissions from petrol and diesel engines and moving towards alternative technologies such as electric vehicles.	The SEA should include objectives that would promote the reduction of emissions from National Networks and support the transformation to a low carbon economy. The SEA should consider how the Local Plan Review will reduce the generation of waste. The SEA should consider how the Local Plan Review will protect the natural environment.
Carbon budget and growth delivery plan (2025)	This report serves as the "section 14" report under the Climate Change Act 2008. It is published to inform Parliament the public about the government's proposals and policies to enable carbon budgets to be met. The Plan sets out to outline the benefits of a clean energy economy and sets out the strategy to reduce emissions that can enhance energy security, create economic growth and good jobs and protect the environment.	The Local Plan Review and SEA should aim to reduce carbon emissions and reduce climate change impacts in order to contribute to the multifaceted benefits of clean energy as outlined in this Plan.
Third National Adaptation Programme (NAP3) (2023)	The National Adaptation Programme sets the actions that government and others will take to adapt to the impacts of climate change in the UK. The NAP3 sets out the key actions for 2023 to 2028. This report forms part of the 5-yearly cycle of requirements laid down in the Climate Change Act 2008.	Many of the actions in NAP3 can help to improve standard of living, such as by upgrading buildings and infrastructure. The SEA will need to consider how the Local Plan Review has included measures to adapt to future climate change risks.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
	The NAP3 includes climate risks and actions for avoiding or mitigating these in the infrastructure; natural environment; health, communities and built environment; business and industry; and international sectors.	
UK's Third Climate Change Risk Assessment (2022)	As required by the Climate Change Act 2008, the UK government has undertaken the third five-year assessment of the risks of climate change on the UK. This is based on the Independent Assessment of UK Climate Risk, the statutory advice provided by the Climate Change Committee (CCC), commissioned by the UK government and devolved administrations. The risk assessment considers 61 UK-wide climate risks and opportunities cutting across multiple sectors of the economy and prioritises the following eight risk areas for action in the next two years.	The SEA will need to consider how the Local Plan Review has included measures to adapt to future climate change risks.
Wildlife and Countryside Act 1981 (as amended)	The Act is the principal mechanism for providing legislative protection of wildlife in Great Britain. Species listed in Schedule 5 of the Act are protected from disturbance, injury, intentional destruction, or sale. Other provisions outlaw certain methods of taking or killing listed species. This Act is brought up to date regularly to ensure the most endangered animals are on the schedule. The Act also improved protection for the most important wildlife habitats.	Some aspects of the Local Plan Review may have impacts on habitats and species. The SEA should seek to maintain or enhance the quality of habitats and biodiversity and take regard of protected species and habitats when assessing the Local Plan Review.

10.3 Regional

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Commissioning Plan for Education Provision in Kent 2023-2027	The County Council is the Strategic Commissioner of Education Provision in Kent. The Commissioning Plan sets out how KCC will ensure that there are sufficient high-quality places, in the right places for all learners, while at the same time raising education standards and promoting parental preference. The Plan details the expected future need for education provision.	The SEA Framework should include objectives for education provision and improved skills and training.
High Weald AONB Management Plan 2024-2029	The Management Plan sets out the five-year objectives for conserving the nationally important landscape. It provides a guide on actions that can be taken to help safeguard the area.	The SEA should take regard of how the potential indirect impacts it may have on the High Weald National Landscape.
Kent and Medway Local Nature Recovery Strategy (2025)	Kent County Council are the responsible authority appointed to lead on this LNRS. The responsible authority is required to follow the LNRS regulations and statutory guidance to prepare this document. The purpose of the strategy is to provide a set of agreed, ambitious priorities for nature recovery, with practical measures included to deliver these priorities. It is a spatially framed strategy that outlines a shared vision for nature recovery and framework for its delivery. Some intentions of the strategy include directing action and investment into areas that need it most, and steering losses and impacts away from the most valuable assets. The strategy also hopes to maximise the opportunities for development, land use and land management that are expected in the region towards making a positive contribution to nature recovery.	The Local Plan Review should aim to align its policy with the objectives of this LNRS. The SEA should ensure that proposed site allocations are maximising their opportunities for positive contribution to biodiversity, and not resulting in adverse impacts to nature, especially more valuable sites.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Kent County Council Environment Plan 2025	The KCC Environment Plan sets a commitment for protecting and enhancing Kent's unique and diverse environment, ensuring sustainable economic and social growth, while improving the health and wellbeing of residents. It includes 6 main goals: • Goal 1: Deliver green energy and reduce carbon emissions. • Goal 2: Adapt to our changing climate. • Goal 3: Reduce flood risk and manage water resources effectively. • Goal 4: Protect and improve the natural and built environment. • Goal 5: Manage resources through a circular economy. • Goal 6: Conserve and promote Kent's natural beauty and heritage.	The Local Plan Review and SEA should work towards holistically achieving the goals set out within the Environment Plan, through protection and enhancement of the local environment.
Kent County Council Flood Response plan (2023)	This Plan sets out the principles of the county response in the event of significant flooding. The main objectives is to ensure the coordination and protection of life and well-being in such an event. Protection of property, local businesses, residents and the environment is also central to this Plan. It focuses primarily on coastal and river flooding.	The Local Plan Review should have policies in place that support efficient flood planning.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Kent County Council Local Flood Risk Management Strategy 2024-2034	The LFRSM considers an overview of flooding that arises from surface runoff, watercourses and groundwater. The Strategy sets out how KCC aim to manage flood risk and improve the safety and wellbeing of Kent's residents and the economy. The objectives focus on creating resilient communities and infrastructure to ensure that local people can contribute to taking an active role in flood risk management, through efforts such as having better flood planning in place.	The Local Plan Review and SEA should work to ensure development proposals are not approved for areas of flood risk, and that any new development has flood mitigation in place and does not contribute to worsening risk.
Kent County Council Rights of Way Improvement Plan 2018-2028	The Improvement Plan aims to provide a high quality, well maintained public rights of way network that encourages active lifestyles, sustainable travel choices and supports the economy in the process through making Kent a better place to live and visit.	The SEA should explore how the PRoW network available in Kent may contribute to improving active travel uptake and healthy and active lifestyles for the residents of Tunbridge Wells.
Plan Tree: Kent County Council's Tree Establishment Strategy 2022-2032	The Tree Strategy sets an ambition for Kent to extend tree cover by an increase of 1.5 million new trees, in order to support woodland health, and provide greater protection to forests. They aim to do this through better management and protection of existing trees, ensuring the right monitoring and application of strict standards for biosecurity.	The Local Plan Review should contribute to the protection of trees, and the SEA should ensure development sites will not have undue impact on trees and woodland habitats.
Kent County Council Minerals and Waste Local Plan 2024 to 2039	As the Minerals and Waste Planning Authority for Kent, KCC plan for sustainable waste management capacity and mineral supply to ensure that communities have the waste infrastructure and raw materials that it needs, whilst protecting the environment. The Minerals and Waste Local Plan sets out the strategy and planning	The SEA Framework will include an objectives to manage waste. This should have regard to existing waste streams and

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
(Adopted March 2025)	policies for waste management and mineral extraction across the region.	waste management systems in the borough.
Kent Nature Partnership Biodiversity Strategy 2020-2045 (2020)	The Kent Biodiversity Strategy aims to deliver, over a 25-year period, the maintenance, restoration and creation of habitats that are thriving with wildlife and plants and ensure that the county's terrestrial, freshwater, intertidal and marine environments regain and retain good health. The Strategy considers the 25 Year Environment Plan 'A Green Future' and translates these policies to the local levels and sets out how the county will deliver	The Local Plan Review will need to have regard to Kent's biodiversity strategy and any habitats/species of importance that are present in the borough. The SEA will assess potential impacts on biodiversity from the plan and identify mitigation where required.
Kent Growth and Infrastructure Framework (GIF) (2018 update)	The GIF provides a strategic framework across the county for identifying and prioritising investment across a range of infrastructure. The Framework is fundamental in providing robust evidence to attract investment and engagement, and in supporting the case for public funding bids and packaging projects for major private sector investment. The Framework draws together information and data from a range of sources, including district local plans, Infrastructure Delivery Plans (IDPs) and infrastructure and service providers.	The SEA should have regard for the future infrastructure provision of the wider area when considering locations for new development.
Thames River Basin District Management Plan (2022)	The RBMP was updated in 2022 and describes the challenges that threaten the water environment and how these challenges can be managed.	The SEA Framework should include objectives that promote reduction and management of flood risk to reduce development in the floodplain.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
River Medway Catchment Flood Management Plan (2009)	The Management Plan considers inland flooding from rivers, groundwater, surface water and tidal flooding. It identifies flood risk management policies to assist decision makers in the catchment.	The SEA Framework should include objectives that promote reduction and management of flood risk to reduce development in the floodplain.
Kent Environment Strategy (2016)	The Strategy builds on the information identified in the state of environment report. The report presents three key themes: building on the foundation for delivery, making best use of existing resources and minimising negative impacts and towards a sustainable future.	The SEA should consider any environmental and economic priorities identified within the Strategy of relevance to the study area.
Kent Joint Health and Wellbeing Strategy (2014-2021)	This strategy outlines priority areas and how the County Council would like to work together to improve people's health and reduce health inequalities that exist in the country. This strategy has been extended until 2021.	The SEA should consider any health and wellbeing issues identified within the Strategy of relevance to the study area.
Vision for Kent (2012-2022)	The Vision for Kent is a countywide strategy for the social, economic and environmental wellbeing of Kent's communities	The Local Plan Review should consider and align with the priorities and ambitions set out in the vision.
South East River Basin Management Plan (2023)	This RBMP sets out the current state of the water environment, pressures, environmental objectives and measures and progress since 2009.	The Local Plan Review and SEA should consider any particular environmental sensitivities and measures set out in the RBMP.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Kent Strategic Delivery Plan (2020-2023)	The Plan sets out a single business plan for the County; it sets out significant activities which will be delivered to achieve better outcomes for residents. This Plan acts as a single business plan for the County.	The Local Plan Review should consider the actions and priorities set out in the Plan to improve quality of life in the County.

10.4 Local

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Air Quality Action Plan 2018-2023	The Plan sets out action to meet the following aims: • To ensure that TWBC is complying with relevant air quality legislation; • To achieve a higher standard of air quality across Tunbridge Wells borough; • To engage with partners and colleagues including those representing Highways and Transportation, Public Health, Economic Development, local bus companies, and other relevant stakeholders, to improve air quality across the borough; • To build on previous work in this area in order to drive further improvements in air quality with the ultimate aim of being able to revoke AQMAs.	The Local Plan Review should seek to reduce the impact of traffic induced emissions and the impact on local air quality.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Biodiversity Action Plan (2008)	The BAP contains individual habitat and species action plans to help safeguard Tunbridge Wells borough's biodiversity, now and for the future. Nationally threatened habitats and species that occur in Tunbridge Wells borough are included and action plans for species and habitats of local significance.	The Local Plan Review will need to have regard for biodiversity strategy. The SEA will assess potential impacts on biodiversity from the Plan and identify required mitigation.
Borough Climate Change Strategy (2025)	In response to the Council's Climate Emergency Declaration in 2019, TWBC set a commitment to review actions that are needed to address this. This includes how the wider community, business, organisations and individuals can be encouraged to make their own contributions to meeting a goal of becoming a Net Zero Borough by 2030.	The SEA Framework should include an objective to limit the impacts of climate change. The Local Plan Review should include measures to contribute to the borough goal of Net Zero by 2030.
Contaminated Land Inspection Strategy 2021-2026	This Strategy outlines how TWBC will meet its statutory duties to investigate potentially contaminated land in the borough as laid out in the Contaminated Land Statutory Guidance 2012 (Defra). It sets out a series of objectives and aims for reducing the risk of contamination. It identifies and prioritises sites that may be potentially contaminated due to their current or past use and includes detailed site inspections.	The SEA Framework should include an objective on protection from land contamination. The Local Plan Review should be aware of any potential contamination within the borough and in close proximity to vulnerable receptors or new development proposals.
Cultural Strategy 2014-2024	The cultural strategy set out a 10-year vision to row the role of TWBC as a cultural centre of the Kent & Sussex High Weald. Key priorities included: support the growth of existing creative businesses and new startups; and promote, develop and protect the borough's existing cultural strengths.	The Local Plan Review should seek to continue the contribution of the town centre to the borough's vision for cultural growth in the area.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Housing, Homelessness and Rough Sleeping Strategy 2026-2032	This strategy outlines TWBC's commitment to preventing homelessness, reducing rough sleeping and ensuring residents have access to safe, secure and suitable accommodation.	The Local Plan Review should include policies that address homelessness and provide suitable accommodation for those in need.
Infrastructure Delivery Plan (2025)	TWBC's IDP details the infrastructure that is required to support the existing and future needs and demands for the borough to support new development and a growing population, as envisaged through the Local Plan. It identifies the capacity issues in the existing infrastructure and sets out the future infrastructure provision, and indicative costs, for the borough to meet the future development needs.	The Local Plan Review should have regard for the future infrastructure provision of the borough when considering locations for new development.
Local Cycling and Walking Infrastructure Plan (LCWIP) Phase 1 (2019) and Phase 2 (2021)	Phase 1 provides an approach to development local networks for cycling and walking focused on the town centre where opportunities have been identified for shorter journeys to be made more active. Phase 2 expands on the Phase 1 study to develop measures for low-traffic neighbourhoods and inter-urban routes which is a safe cycling network connecting the borough's main urban settlements.	The SEA should consider how the Local Plan Review encourages the public away from private vehicle use, and how this may change the visitor economy of towns and urban centres. The pursuit of active travel and healthy lifestyles for visitors of the town centre should be encouraged.
Sports and Active Recreation Strategy 2024-2032	The Strategy aims to enhance the sports and leisure facilities available to residents and visitors, increasing opportunities for involvement in sports and active recreation, leading to more active lifestyles and better health for local people.	The SEA should take into account the findings of this report, and ensure sports and recreational facility needs are being

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
		met through community investment from new developments.
Strategic Flood Risk Assessment - Level 1 and Level 2 (2019, to be updated as part of the Local Plan review)	The main purpose of the SFRA is to inform selection of options for Local Plan allocations and support determination of planning applications. The SFRA provides recommendations to help future development reduce overall levels of flood risk, promotes use of SuDs and green infrastructure while exploring opportunities to improve WFD status.	The SEA Framework should include objectives that promote the reduction and management of flood risk. The Local Plan Review should consider potential flood risk and floodplain proximity with any future development with particular regard to sites allocated in the Plan.
Strategic Housing and Economic Land Availability Assessment (SHELAA) (2021, to be updated as part of the Local Plan review)	The SHELAA identifies the amount and the general locations of land for possible future development in the borough. This will help the Council to ensure that attempts to meet the Government's housing delivery targets are not constrained by the lack of availability for housing land.	The document should be used to inform housing policy in the Local Plan Review, and the SEA should be aware of housing availability and housing needs.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Transport Strategy 2015-2026	The Transport Strategy sets out objectives to guide the delivery of the Transport Strategy vision to: • benefitting 'from a network of higher quality, better integrated, sustainable transport solutions, and infrastructure, which will enable the borough to solve existing and future transport challenges, and enable a vibrant, prosperous economy and inclusive communities. • By 2026, Tunbridge Wells will have a transport network which is less reliant on the private car, with a greater mode share towards walking, cycling and public transport, especially for shorter journeys. However, it is recognised that some journeys will continue to necessitate use of the private car, especially in rural areas. • The borough will have a safer environment for all road users, and its air will be cleaner with more low emission vehicles and bicycles sharing road space.'	The SEA and Local Plan should consider the objectives of the wider strategic transport vision for the borough.
Tunbridge Wells Retail, Commercial Leisure & Town Centre Uses Study Update (2021)	Study undertaken to inform the TWBC Submission Local Plan to provide the Council with an up-to-date objective assessment of town centre needs and provision, the health of RTW Primary Regional Town Centre, Cranbrook, Paddock Wood and Southborough Town Centres, and Hawkhurst Rural Service Centre, and a consideration of possible strategic policy responses to any prevalent or emerging issues in those centres.	This report will be considered where relevant to inform the SEA assessment of the Local Plan Review.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
TWBC Open Space, Sport and Recreation Study 2017-2033 (2018) - Tunbridge Wells Borough Indoor/Built Sports Facilities Needs Assessment	The key evidence base in relation to Open Space, Sports and Recreation is made up of four individual studies. These include: The Playing Pitch Strategy, Open Space Study, Indoor/Built Sports Facility Needs Assessment and the Community and Stakeholder Consultation Reports. These studies are collectively referred to as the Open Space, Sport and Recreation Study and form part of the evidence base which will be used to inform policies and allocations within the Local Plan Review. Study on the availability, quantity and accessibility of open space, sport and recreation opportunities within the borough in the context of existing and future needs.	Information provided by the assessment should guide the Council in their strategic approach to the future provision, maintenance and enhancement of opportunities in the borough.
Tunbridge Wells Green Belt Study (2017, to be updated as part of the Local Plan Review)	The report presents the findings of an assessment of the contribution to Green Belt purposes made by land within the Green Belt in the borough. It also employs the same assessment criteria to consider how certain areas of land adjacent to the Green Belt would contribute, were they to be designated.	The study findings will help inform the baseline and SEA of the Local Plan Review by assessing potential impacts on the surrounding landscape within the Green Belt where relevant.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
Landscape Character Assessment SPD (2017)	The LCA is an update on previous assessment of the local landscape areas across the borough. It provides a guide which is designed for both developers and decision-makers to help them consider landscape character when planning any type of change. The guidance is arranged around key stages, setting out a series of questions as prompts to assist in using available information to shape proposals / assist in planning decisions.	The LCA has been used to identify the baseline conditions of the wider borough area. The SEA Framework should include objectives, indicators and targets relating to the preservation and enhancement of landscape and townscape quality. The Local Plan Review should seek to restore, protect and enhance the landscape and townscape character and quality.
Noise and Vibration SPD (2014)	The SPD provides noise and vibration criteria for developers where new proposals are being made that will generate noise or vibration, or are in a noisy location, or in a noise sensitive area, to ensure that the potential or existing noise / vibration levels in the area are acceptable. As a starting point, it is expected that new development will not increase background noise levels.	The Local Plan Review should include policy that protect residents from the adverse effects of noise.
Tunbridge Wells Borough Council Authority Monitoring Report 2023/2024	This report sets out progress made in relation to planning context, local plan preparation, neighbourhood development plans, effectiveness of Core Strategy policies, and updating and refinement of monitoring frameworks.	The Local Plan Review should consider the findings of the monitoring report and borough profile.
Tunbridge Wells Bus Feasibility Review (2023)	This study revised the previous bus network study in line with the Local Plan. This includes a review of the revenue and capital costs, and recent increases in price of fuel and operational costs.	The Local Plan Review should consider the implications of the bus route study recommendations.

Plan, policy or programme	Key objectives or requirements relevant to the SEA / Local Plan Review	Implications for the SEA / Local Plan Review
TWBC Five-Year Housing Land Supply Statement	This report sets out the methodology applied to calculate the five year housing land supply for the borough. This is calculated using anticipated supply of new homes against those required to be built in the borough.	The Local Plan Review should consider the supply statement in relation to its proposed dwelling provision.
TWBC Local Development Scheme (2025)	This document sets out the details of the planning policy document the Council has adopted, is in preparation and that will be prepared.	The Local Scheme should consider the current adopted policies and forthcoming policies as identified in this document.

11 References

- Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations 2019 [Online] Available at: <https://www.legislation.gov.uk/ukxi/2019/74/made>. Accessed 9th June 2026
- Ancient Monuments and Archaeological Areas Act 1979 [Online] Available at: <https://www.legislation.gov.uk/ukpga/1979/46>. Accessed 9th June 2026
- Climate Change Act 2008 [Online] Available at: <https://www.legislation.gov.uk/ukpga/2008/27/contents>. Accessed 9th June 2026.
- Contaminated Land (England) Regulations 2006 [Online] Available at: <https://www.legislation.gov.uk/ukxi/2006/1380/contents/made>. Accessed 9th June 2026.
- Countryside and Rights of Way Act 2000 [Online] Available at: <https://www.legislation.gov.uk/ukpga/2000/37/contents>. Accessed 9th June 2026.
- Defra (2012) Contaminated land statutory guidance. [Online] Available at: <https://www.gov.uk/government/publications/contaminated-land-statutory-guidance>. Accessed 9th June 2026.
- Defra (2018) 25 Year Environment Plan (25YEP) [Online] Available at: <https://www.gov.uk/government/publications/25-year-environment-plan>. Accessed 9th June 2026.
- Defra (2019) Noise Action Plan for agglomerations (urban areas). [Online] Available at: <https://www.gov.uk/government/publications/noise-action-plans-large-urban-areas-roads-and-railways-2019>. Accessed 9th June 2026.
- Defra (2022) UK Climate Change Risk Assessment. [Online] Available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2022>. Accessed 9th June 2026.
- Defra (2023) Environmental Improvement Plan (EIP) 2023 First Revision of the 25-year Environment Plan. [Online] Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan>. Accessed 9th June 2026.
- Defra (2026) The Land Use Framework for England. [Online] Available at: https://assets.publishing.service.gov.uk/media/69c69033471d520038d0f7a6/Land_Use_Framework_Accessible.pdf. Accessed 9th June 2026.
- Department for Transport (2021) National Bus Strategy [Online] Available at: <https://www.gov.uk/government/publications/bus-back-better>. Accessed 9th June 2026.
- Environment Agency (2009) River Medway Catchment Flood Management Plan. [Online] Available at: <https://www.gov.uk/government/publications/medway-catchment-flood-management-plan>. Accessed 9th June 2026.

Environment Agency (2022a) Thames River Basin District River Basin Management Plan. [Online] Available at: <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022>. Accessed 9th June 2026.

Environment Agency (2022b) South East River Basin District River Basin Management Plan. [Online] Available at: <https://www.gov.uk/guidance/south-east-river-basin-district-river-basin-management-plan-updated-2022>. Accessed 9th June 2026.

Environment Act 2021 [Online] Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>. Accessed 9th June 2026.

Environmental Assessment of Plans and Programmes Regulations 2004 [Online] Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents>. Accessed 9th June 2026.

Environmental Noise (England) Regulations 2006 [Online] Available at: <https://www.legislation.gov.uk/uksi/2006/2238/contents/made>. Accessed 9th June 2026.

Environmental Protection Act 1990 [Online] Available at: <https://www.legislation.gov.uk/ukpga/1990/43/contents>. Accessed 9th June 2026.

Ethos Environmental Planning Ltd (2018a) Tunbridge Wells Borough Indoor/Built Sports Facility Needs Assessment 2017 - 2033 [Online] Available at: https://tunbridgewells.gov.uk/_data/assets/pdf_file/0005/343796/7312851EC5CC5144E0531401A8C03897_The_Indoor_and_Built_Facility_Needs_Assessment.pdf. Accessed 9th June 2026.

Ethos Environmental Planning (2018b) TWBC Open Space, Sport and Recreation Study. [Online] Available at: <https://tunbridgewells.gov.uk/planning/planning-policy/local-plan/previous-stages/draft-local-plan/employment-leisure-and-retail/open-space>. Accessed 9th June 2026.

Equality Act 2010 [Online] Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents>. Accessed 9th June 2026.

Gov UK (2025) Natural Environment Guidance. [Online] Available at: <https://www.gov.uk/guidance/natural-environment#agricultural-land-soil-and-brownfield-land-of-environmental-value>. Accessed 9th June 2026.

Health and Social Care Act 2012 [Online] Available at: <https://www.legislation.gov.uk/ukpga/2012/7/contents/enacted>. Accessed 9th June 2026.

High Weald Joint Advisory Committee (2019) High Weald AONB Management Plan 2019 - 2024. [Online] Available at: <https://highweald.org/aonb-management-plan/>. Accessed 9th June 2026.

Historic England (2023) Heritage at Risk Register 2023 - London & South East. [Online] Available at: <https://historicengland.org.uk/images-books/publications/har-2023-registers/>. Accessed 9th June 2026.

Historic Environment and Ancient Monuments Act 1953 [Online] Available at: <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>

and Level 2 Strategic Flood Risk Assessment. [Online] Available at:
<https://tunbridgewells.gov.uk/planning/planning-policy/local-plan/previous-stages/draft-local-plan/environment-and-landscape/strategic-flood-risk-assessment>. Accessed 9th June 2026

KCC (2018) Kent and Medway Growth and Infrastructure Framework 2018 update. [Online] Available at: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/housing,-regeneration-and-planning-policies/planning-policies/growth-and-infrastructure-framework>
 gif#:~:text=The%20framework%20draws%20together%20information,and%20infrastructure%20and%20service%20providers. Accessed 9th June 2026.

KCC (2021) Kent Bus Service Improvement Plan. [Online] Available at:
<https://letstalk.kent.gov.uk/busfuture>

Kent Nature Partnership (2020) Kent Nature Partnership Biodiversity Strategy 2020 - 2045. [Online] Available at: <https://kentnature.org.uk/strategy/kent-biodiversity-strategy/>. Accessed 9th June 2026.

KCC (2024) Local Transport Plan 5: Striking the Balance. [Online] Available at:
https://www.kent.gov.uk/_data/assets/pdf_file/0006/208545/Local-Transport-Plan-5.pdf. Accessed 9th June 2026.

KCC (2025) Kent and Medway Local Nature Recovery Strategy. Available at: [Kent and Medway Local Nature Recovery Strategy 2025](#). Accessed 9th June 2026.

LUC (2017) Tunbridge Wells Green Belt Study. [Online] Available at:
<https://tunbridgewells.gov.uk/planning/planning-policy/local-plan/previous-stages/draft-local-plan/environment-and-landscape/tunbridge-wells-green-belt-study>. Accessed 9th June 2026.

LUC (2017) Tunbridge Wells Borough Landscape Character Assessment SPD. [Online] Available at: <https://tunbridgewells.gov.uk/planning/planning-policy/supplementary-planning-documents>. Accessed 9th June 2026.

Kent Biodiversity Action Plan Steering Group (1997) Kent Biodiversity Action Plan: A framework for the future of Kent's wildlife. Available at: [Kent Biodiversity Action Plan | Medway Council](#). Accessed 9th June 2026

Met Office (2016) Southern England: climate. [Online] Available at:
<https://www.metoffice.gov.uk/research/climate/maps-and-data/regional-climates/index>. Accessed 9th June 2026.

Met Office (2026) Local Authority Climate Explorer. [Online] Available at:
<https://themetoffice.maps.arcgis.com/apps/dashboards/506ff7d53c884badb0d8fd36d6280a91>. Accessed 9th June 2026.

Natural Environment and Rural Communities Act 2006 [Online] Available at:
<https://www.legislation.gov.uk/ukpga/2006/16/contents>. Accessed 9th June 2026.

National Planning Policy Framework (2012, updated 2024). [Online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>. Accessed 9th June 2026.

Natural England (2013) 122 High Weald. [Online] Available at: <https://publications.naturalengland.org.uk/publication/4706903212949504?category=58713>. Accessed 9th June 2026.

Natural England (2014) National Character Area profiles. [Online] Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>. Accessed 9th June 2026

Nexus (2017) Retail and Leisure Study. [Online] Available at: https://tunbridgewells.gov.uk/_data/assets/pdf_file/0007/343798/aTunbridge-Wells-Retail-and-Leisure-Study_main-report.pdf. Accessed 9th June 2026.

Nexus (2021) Tunbridge Wells Retail, Commercial Leisure & Town Centre Uses Study Update. [Online] Available at: 10-4 MFU-JBAU-00-00-RP-EN-0002-A1-P04-SA_Scoping_Report . https://tunbridgewells.gov.uk/_data/assets/pdf_file/0007/385405/01_RCLTCU_main_report.pdf. Accessed 9th June 2026

Office of the Deputy Prime Minister (2005a) A Practical Guide to the Strategic Environmental Assessment Directive. [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf. Accessed 9th June 2026

Office of the Deputy Prime Minister (2005b) Planning for Town Centres: Guidance on Design and Implementation tools. [Online] Available at: <https://assets.publishing.service.gov.uk/media/5a75935c40f0b6397f35f7a2/147594.pdf>. Accessed 9th June 2026

Office for National Statistics (2021) 2021 Census Table, Distance travelled to work. [Online] Available at: <https://www.kent.gov.uk/about-the-council/information-and-data/facts-and-figures-about-kent/economy-and-employment-data/kents-workforce>. Accessed 9th June 2026

Office for National Statistics (2024) Tunbridge Wells: E07000116. [Online] Available at: <https://www.ons.gov.uk/explore-local-statistics/areas/E07000116-tunbridge-wells>. Accessed 12th June 2026.

Paddock Wood Town Council (2023) Paddock Wood Neighbourhood Plan 2022-2038 [Online]. Available at: https://tunbridgewells.gov.uk/_data/assets/pdf_file/0008/452384/Paddock-Wood-NDP-Made-Version-Accessible.pdf. Accessed 9th June 2026.

Planning (Listed Buildings and Conservation Area) Act 1990 [Online] Available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents>. Accessed 9th June 2026

South East Water (2023) Revised Water Resources Management Plan 2025 - 2075. [Online] Available at: SEW-rWRMP-Technical-Overview-Document_updated-22-09-23.pdf (southeastwater.co.uk). Accessed 9th June 2026

TWBC (2006) Tunbridge Wells Local Plan. [Online] Available at: <https://tunbridgewells.gov.uk/planning/planning-policy/existing-local-plans/local-plan-2006>. Accessed 9th June 2026

TWBC (2008) Tunbridge Wells Local Biodiversity Action Plan. [Online] Available at: <https://tunbridgewells.gov.uk/planning/conservation-and-heritage/biodiversity-action-plan>. Accessed 9th June 2026

TWBC (2014) Cultural Strategy 2014-24. [Online] Available at: <https://tunbridgewells.gov.uk/council/strategies-plans-and-policies/cultural-strategy>. Accessed 9th June 2026

TWBC (2014) Noise and Vibration Supplementary Planning Document. [Online] Available at: <https://tunbridgewells.gov.uk/planning/planning-policy/supplementary-planning-documents>. Accessed 9th June 2026

TWBC (2019) Transport Strategy Review: Context and Way Forward. [Online] Available at: https://tunbridgewells.gov.uk/_data/assets/pdf_file/0008/384776/Transport-Strategy-Review_Context-and-Way-Forward_accessible.pdf. Accessed 9th June 2026.

TWBC (2020a) Air Quality Action Plan 2018-2023. [Online] Available at: <https://tunbridgewells.gov.uk/community-and-leisure/improving-health/air-quality>. Accessed 9th June 2026.

TWBC (2020b) 2020 Air Quality Annual Status Report (ASR). [Online] Available at: https://tunbridgewells.gov.uk/_data/assets/pdf_file/0003/358608/TWBC-ASR-2020-Final-3-updated.pdf. Accessed June 9th 2026.

TWBC (2021a) Contaminated Land Inspection Strategy 2021-2026. [Online] Available at: <https://tunbridgewells.gov.uk/environment/pollution/contaminated-land/inspection-strategy>. Accessed 9th June 2026

TWBC (2022) Economic Impact of Tourism. [Online] Available at: <https://visitkentbusiness.co.uk/media/70611/economic-impact-of-tourism-tunbridge-wells-2020-final-report.pdf>. Accessed 12th June 2026.

TWBC (2023a) Royal Tunbridge Wells Town Centre Plan. [Online] Available at: <https://tunbridgewells.gov.uk/planning/planning-policy/rtw-town-centre-plan>. Accessed 9th June 2026

TWBC (2023b) Economic Development Strategy 2023-2026. [Online] Available at: <https://tunbridgewells.gov.uk/business-portal/economic-development>. Accessed 9th June 2026

TWBC (2023c) Five-Year Housing Land Supply Statement 2022/2023. [Online] Available at: https://tunbridgewells.gov.uk/_data/assets/pdf_file/0004/452308/Five-Year-Housing_Land-Supply-Statement-2022-2023_Final.pdf. Accessed 9th June 2026

TWBC (2023d) Local Development Scheme. [Online] Available at:
https://forms.tunbridgewells.gov.uk/_data/assets/pdf_file/0018/455130/PS_057-Local-Development-Scheme.pdf. Accessed 9th June 2026

TWBC (2023e) Tunbridge Wells Bus Feasibility Review. [Online] Available at:
https://forms.tunbridgewells.gov.uk/_data/assets/pdf_file/0020/455114/PS_040-Tunbridge-Wells-Public-Transport-Feasibility-Study-Review.pdf. Accessed 9th June 2026

TWBC (2025) Infrastructure Delivery Plan. [Online] Available at:
https://forms.tunbridgewells.gov.uk/_data/assets/pdf_file/0011/480728/PS_105-TWBC-Final-Infrastructure-Delivery-Plan-IDP-August-2024.pdf. Accessed 25th June 2026.

TWBC Climate Action (2025) Waste and Resources. [Online] Available at:
<https://twbccclimateaction.co.uk/climate-strategy/track-our-progress/waste-and-resources/>. Accessed 9th June 2026

UK Government (2019) Clean Air Strategy. [Online] Available at:
<https://www.gov.uk/government/publications/clean-air-strategy-2019>. Accessed 9th June 2026

Water Act 2003. [Online] Available at:
<https://www.legislation.gov.uk/ukpga/2003/37/contents>. Accessed 9th June 2026

Water for Life (2024) Bewl Water. [Online] Available at:
<https://www.southernwater.co.uk/our-region/days-out/our-reservoirs/bewl-water/>. Accessed 12th June 2026.

Wildlife and Countryside Act 1981 (as amended) [Online] Available at:
<https://www.legislation.gov.uk/ukpga/1981/69>. Accessed 9th June 2026

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