

Tunbridge Wells Borough Local Plan



Sustainability Appraisal Issues and Options Report

Draft for Consultation

May 2017

Document History

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

Sustainability Appraisal Scoping Report (Stage A)

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

Sustainability Appraisal (Stage B)

Date	Title	Content	
May 2017	Sustainability Appraisal Assessment Report Issues and Options Stage Consultation Draft	Issue for consultation alongside Local Plan Issues and Options Report	This document
Autumn 2017 (expected)	<i>Sustainability Appraisal Assessment Report</i> <i>Issues and Options Stage</i> <i>Final Report</i>	<i>Updated following consultation with statutory bodies and other interested parties, and consideration of new studies</i>	TBC

Non Technical Summary

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

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

Testing the Local Plan objectives against the sustainability appraisal framework

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

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

Developing the Local Plan options including reasonable alternatives

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

Evaluating the likely effects of the Local Plan alternatives

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

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

Considering ways of mitigating adverse effects and maximising beneficial effects

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

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

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

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1 Introduction

1.1 Local Plan background

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

1.2 Sustainability Appraisal Background

- 1.2.1 A Sustainability Appraisal (SA) is required during the preparation of a Local Plan by the Planning and Compulsory Purchase Act 2004 to ensure compliance with the requirements of the Strategic Environmental Assessment Directive. Its purpose is to help the Local Authority assess how effectively the Local Plan contributes to sustainable development.
- 1.2.2 There are five key stages in the preparation of a Sustainability Appraisal that are carried out alongside the preparation of a Local Plan (see Figure 1).

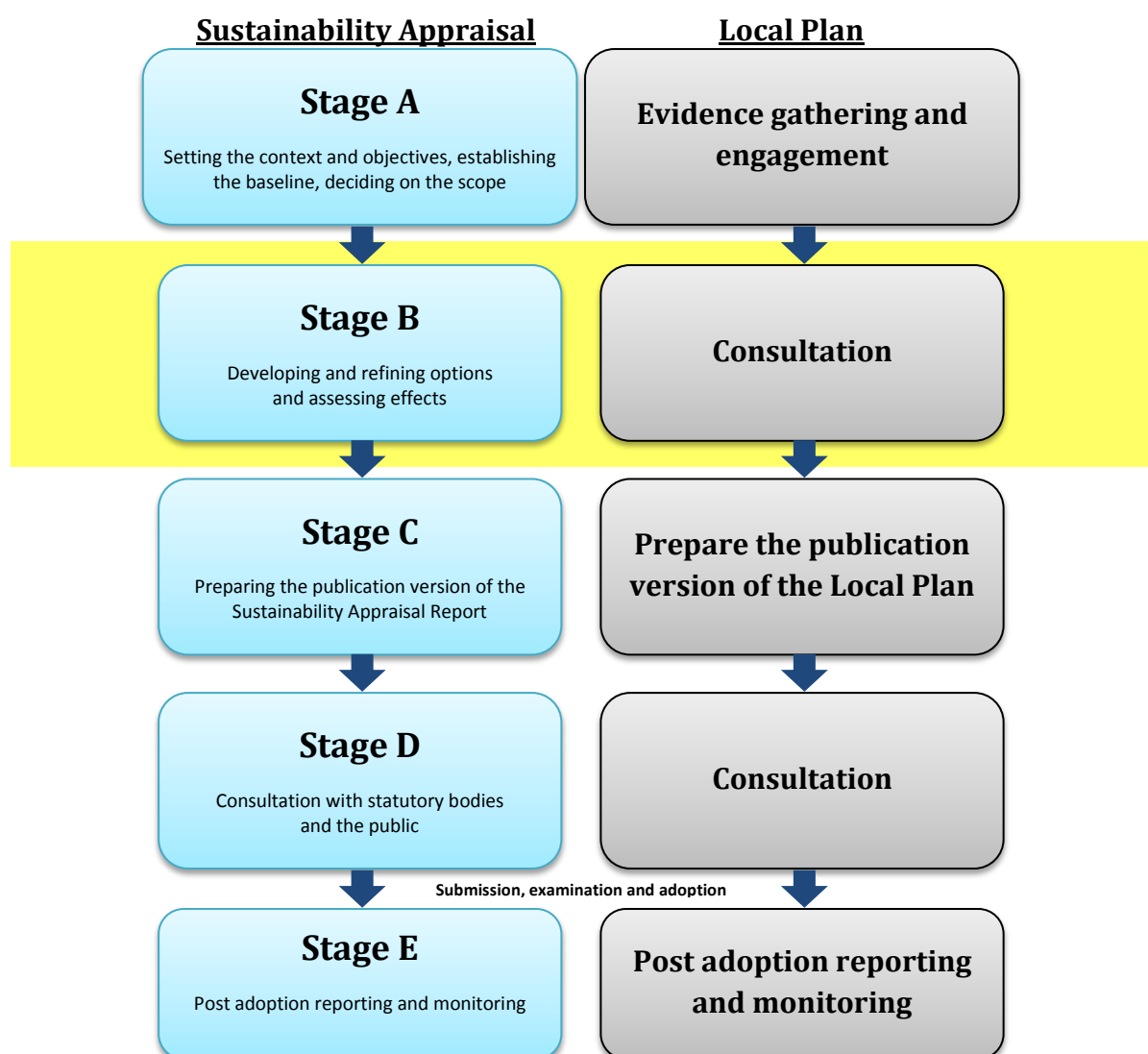


Figure 1. Key stages of Local Plan preparation and the relationship with the sustainability appraisal process. Adapted from Planning Practice Guidance Reference 11-013-20140306. **Yellow highlight** indicates current stage of work.

1.3 Purpose of this Report

- 1.3.1 Stage A of the sustainability appraisal process was undertaken in 2015-16 and resulted in the production of a Scoping Report that was consulted on in June 2016. The report was then updated to take into account consultees' comments and a final version prepared in October 2016. The Stage A Scoping Report should be referred to for a description of the baseline, relevant plans, policies and programmes and the justification for the sustainability objectives that are being implemented in this Issues and Options Sustainability Appraisal report.
- 1.3.2 This report represents Stage B of the process. Stage B is divided into five further sub-processes (see Figure 2).

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

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

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

The Stage B sub-processes are shown within the margins

Questions for consultees:

To determine the effectiveness of the Stage B process to date, key questions for consultees are posed in green boxes throughout this report.

2 Legal Compliance

2.1 The SEA Directive

2.1.1 Table 1 below shows how the Sustainability Appraisal process associated with the production of the new Local Plan incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the “Strategic Environmental Assessment Regulations”), which implement the requirements of the European Directive 2001/42/EC (the “Strategic Environmental Assessment Directive”) on the assessment of the effects of certain plans and programmes on the environment.

Table 1. SEA Regulations checklist

SEA Regulations Requirements	Relevant Report
Preparation of environmental report (Reg 12) including:	Scoping Report (2016) Issues and Options Sustainability Appraisal (this report) Draft Local Plan Sustainability Appraisal (future report)
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Issues and Options Sustainability Appraisal (this report). Section 1.1
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Scoping Report (2016) Section 3.4 Issues and Options Sustainability Appraisal (this report). Section 4.2
The environment characteristics of areas likely to be significantly affected	Scoping Report (2016) Appendix E Issues and Options Sustainability Appraisal (this report). Chapters 4 and 5
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).	Scoping Report (2016) Section 4.4 and Appendix E
The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Scoping Report (2016) Chapter 2

SEA Regulations Requirements	Relevant Report
<p>The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.</p>	<p>Issues and Options Sustainability Appraisal (this report). Chapters 4 and 5</p> <p>Draft Local Plan Sustainability Appraisal (future report)</p>
<p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p>Issues and Options Sustainability Appraisal (this report). Chapter 5</p> <p>Draft Local Plan Sustainability Appraisal (future report)</p>
<p>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Draft Local Plan Sustainability Appraisal (future report)</p>
<p>A description of measures envisaged concerning monitoring in accordance with regulation 17.</p>	<p>Issues and Options Sustainability Appraisal (this report). Chapter 6</p> <p>Draft Local Plan Sustainability Appraisal (future report)</p>
<p>A non-technical summary of the information provided under the above headings.</p>	<p>Scoping Report (2016) Executive Summary</p> <p>Issues and Options Sustainability Appraisal (this report). Non Technical Summary</p> <p>Draft Local Plan Sustainability Appraisal (future report)</p>
<p>Consultation Procedures (Reg 13)</p> <p>As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.</p>	<p>Scoping Report (2016) Chapter 6</p> <p>Issues and Options Sustainability Appraisal (this report). Chapter 7</p> <p>Draft Local Plan Sustainability Appraisal (future report)</p>

SEA Regulations Requirements	Relevant Report
<p>Information as to adoption of plan or programme (Reg 16)</p> <p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> - the plan or programme adopted - the environmental report - a statement summarising: <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: <ul style="list-style-type: none"> (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. 	<p>Adoption statement (future report)</p>
<p>Monitoring of implementation of plans or programmes (Reg 17)</p> <p>Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>Issues and Options Sustainability Appraisal (this report). Chapter 6</p> <p>Draft Local Plan Sustainability Appraisal (future report)</p>

3 Methodology

3.1 Sustainability Objectives

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

Table 2. Sustainability Objectives for Tunbridge Wells Borough

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

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

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

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

3.2 Scoring method

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

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

3.2.2 Where the scores across the various key indicators or decision-aiding questions vary, an overall score is determined using the following process:

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

3.2.3 Indicator weightings and scores for decision-aiding questions can be seen in Appendix B. This shows the scoring for Growth Strategy 1 as an example of how overall scores were applied.

3.2.4 Once an overall score for each objective was determined, a scoring summary table was provided that summarises the scoring across all objectives and, importantly, provides a written commentary on the overall impressions of the policy, strategy or allocation, including recommendations and potential improvements.

3.2.5 Also, it should be noted that no assumptions were made about mitigation being put in place prior to a score being applied. The only exception to this was where a policy is sufficiently advanced so as to include a specific requirement for mitigation. This is not the case at Issues and Options stage. At this stage, potential mitigation options are discussed in the description once scores were applied.

3.2.6 Because topics and objectives cannot be directly weighed against one another, readers are

discouraged from ‘adding up’ positive or negative scores to give an overall score for a policy, strategy or allocation. For example, a very positive score for landscape is **not** neutralised by a very negative score for transport. Positive and negative impacts must be considered alongside the written commentary.

Question 1

Do you have any comments regarding this method for scoring the various aspects of the new Local Plan against the sustainability objectives?

3.3 Updates to Baseline Data

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

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

Evidence	Source	Expected Date for Completion
Ecological Studies	KMBRC	Spring 2017
Green Belt Capacity Review	External consultant commissioned by TWBC	Spring/Summer 2017
Gypsy and Traveller Needs Assessment	External consultant commissioned by TWBC	End 2017
Heritage Strategy	TWBC Conservation Team	Spring 2018
Historic Landscape Characterisation	External consultant commissioned by TWBC	Summer 2017
Historic Environment Review	External consultant commissioned by TWBC	Summer 2017
Housing Needs Survey	External consultant commissioned by TWBC	End 2017
Infrastructure Development Plan	TWBC Policy Team	Spring 2018
Landscape Capacity Study (RTW)	External consultant commissioned by TWBC	Spring 2017
Landscape Character Assessment	External consultant commissioned by TWBC	Spring 2017

Evidence	Source	Expected Date for Completion
Neighbourhood Plans	External consultants commissioned by parish councils	At various stages throughout borough. Hawkhurst's expected to be "made" by Autumn 2017
Open Space/Recreation Study	External consultant commissioned by TWBC	End 2017
Playing Fields/Pitch Strategy	External consultant commissioned by TWBC	Summer 2017
Retail Study	External consultant commissioned by TWBC	Spring 2017
Settlement Role and Function Study	Internal assessment by TWBC	Spring 2017
Strategic Flood Risk Assessment	External consultant commissioned by TWBC	Summer 2017
Strategic Housing and Economic Land Availability Assessment (SHELAA)	TWBC Policy Team	Spring 2017 (interim study only)
Urban tree canopy data mapping	Forestry Commission national programme	Spring 2017
Viability Assessment	External consultants commissioned by TWBC	Spring 2018

4 Sustainability Appraisal

4.1 Local Plan Strategic Objectives

Stage B1

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

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

Figure 3. Strategic objectives of the new Local Plan.

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

4.1.3 When testing these objectives the following assumptions were made:

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

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

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

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

Legend:

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

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

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

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

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

Table 6. Number of Local Plan Objectives that are compatible with sustainability objectives. Row colour indicates where there are more compatible objectives than incompatible (green) or vice versa (pink). No colour indicates an equal number of compatible and incompatible objectives.

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

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

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

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

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

Stage B2 4.2 Growth Strategy Options

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

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

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

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

- 4.2.3 Summary tables of the appraisals for each of the above six options follow in the proceeding pages. Before studying the appraisals, it should be noted that the following assumptions were made before scores were applied and commentary prepared.
- a) There would be no significant difference in growth distribution between Growth Options 1 - 3. All three options direct the majority of development to Royal Tunbridge Wells and Southborough.
 - b) For Growth Option 5, the new settlement would be located separately from existing settlements and in a location with existing sustainable transport options (or sustainable transport options will be provided as part of the development).
 - c) New schools would be built to accommodate both new and existing demands.
 - d) New development would bring about opportunities to improve deprivation.
 - e) There would be no net loss of existing green space.
 - g) Any change to flood risk as a result of implementing Growth Strategy 4 would be accounted for and mitigated.
 - h) As explained in paragraph 3.2.5, no assumptions about mitigation have been made at this stage.
- 4.2.4 The following tables are summaries only. An example of how a strategy has been scored at the level of sub-objective and decision-making criteria is included in Appendix B. In order to prevent this report being excessively large, detailed scoring assessments for each of the other growth strategy options are available upon request.

OPTION 1: FOCUSED GROWTH									
Development distribution focused as per existing Core Strategy, i.e. majority of new development directed to Royal Tunbridge Wells/Southborough, a smaller proportion to the other three main settlements of Paddock Wood, Cranbrook and Hawkhurst and limited development within the villages and rural areas.									
Sustainability Objective		Score							
Number	Topic	?	---	--	-	0	+	++	+++
1	Air			✓					
2	Biodiversity				✓				
3	Business Growth					✓			
4	Climate Change				✓				
5	Deprivation							✓	
6	Education					✓			
7	Employment							✓	
8	Equality								✓
9	Health						✓		
10	Heritage				✓				
11	Housing						✓		
12	Land use				✓				
13	Landscape				✓				
14	Noise			✓					
15	Resources	✓							
16	Services & Facilities							✓	
17	Travel						✓		
18	Waste	✓							
19	Water				✓				
Summary and Recommendations <p>This strategy was assessed and adopted by the Borough Council for the last plan period and thus predicting impacts can be carried out with greater accuracy than the other strategies.</p> <p>The strategy concentrates development around Royal Tunbridge Wells and Southborough and thus exacerbates some of the existing problems in these areas (e.g. air quality).</p> <p>Because losses for biodiversity are likely, it is recommended that biodiversity mitigation schemes be devised.</p> <p>High housing demands put economic floor space at risk. A policy would be needed to prevent economic floor space being lost in preference for housing especially in well located employment sites.</p> <p>It is also recommended that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into the affordability criteria for new homes.</p> <p>New schools or school expansions should be provided to meet both current and future demands.</p> <p>Without detail on the exact location for development, it is difficult to score the ancient woodland and GI aspects of the Landscape objective. Scores are based on an assumption that there would be no net loss of GI and ancient woodland would be afforded strong protection.</p> <p>Waste and resources would be considered through DM policy so are not scored.</p> <p>See Appendix B for full scoring assessment.</p>									

OPTION 2: SEMI-DISPERSED GROWTH

Development distribution semi-dispersed, with the majority of new development directed to Royal Tunbridge Wells/Southborough and a proportion distributed to other main settlements of Paddock Wood, Cranbrook and Hawkhurst (as per Option 1), but additionally a percentage of development directed to some of the larger villages (taking account of the updated settlement hierarchy work). Limited development within the remaining villages and rural areas.

Sustainability Objective		Score							
Number	Topic	?	---	--	-	0	+	++	+++
1	Air			✓					
2	Biodiversity				✓				
3	Business Growth						✓		
4	Climate Change			✓					
5	Deprivation							✓	
6	Education					✓			
7	Employment							✓	
8	Equality								✓
9	Health						✓		
10	Heritage				✓				
11	Housing							✓	
12	Land use		✓						
13	Landscape			✓					
14	Noise			✓					
15	Resources	✓							
16	Services & Facilities				✓				
17	Travel				✓				
18	Waste	✓							
19	Water				✓				

Summary and Recommendations

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

If development in villages was coupled with improvements to local services and active transport infrastructure, a benefit may be seen.

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

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

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

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

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

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

Full scoring assessment available upon request.

OPTION 3: DISPERSED GROWTH									
Development distribution proportional across all the borough's settlements.									
Sustainability Objective		Score							
Number	Topic	?	---	--	-	0	+	++	+++
1	Air				✓				
2	Biodiversity				✓				
3	Business Growth						✓		
4	Climate Change			✓					
5	Deprivation						✓		
6	Education					✓			
7	Employment						✓		
8	Equality							✓	
9	Health						✓		
10	Heritage						✓		
11	Housing							✓	
12	Land use		✓						
13	Landscape			✓					
14	Noise				✓				
15	Resources	✓							
16	Services & Facilities			✓					
17	Travel			✓					
18	Waste	✓							
19	Water				✓				
Summary and Recommendations <p>This strategy concentrates development around Royal Tunbridge Wells and Southborough and thus exacerbates some of the existing problems in these areas (e.g. air quality).</p> <p>Because losses for biodiversity are likely, it is recommended that biodiversity mitigation schemes be devised.</p> <p>High housing demands put economic floor space at risk. A policy would be needed to prevent economic floor space being lost in preference for housing especially in well located employment sites.</p> <p>It is also recommended that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into the affordability criteria for new homes.</p> <p>New schools or school expansions should be provided to meet both current and future demands.</p> <p>Without detail on the exact location for development, it is difficult to score the ancient woodland and GI aspects of the Landscape objective. Scores are based on an assumption that there would be no let loss of GI and ancient woodland would be afforded strong protection.</p> <p>Waste and resources would be considered through DM policy so are not scored.</p> <p>Full scoring assessment available upon request.</p>									

OPTION 4: GROWTH CORRIDOR-LED APPROACH

Development distribution focused around the A21, close to Royal Tunbridge Wells and Pembury, as a new 'growth corridor'.

Sustainability Objective		Score							
Number	Topic	?	---	--	-	0	+	++	+++
1	Air				✓				
2	Biodiversity				✓				
3	Business Growth								✓
4	Climate Change				✓				
5	Deprivation						✓		
6	Education					✓			
7	Employment								✓
8	Equality						✓		
9	Health					✓			
10	Heritage					✓			
11	Housing						✓		
12	Land use		✓						
13	Landscape			✓					
14	Noise				✓				
15	Resources	✓							
16	Services & Facilities						✓		
17	Travel						✓		
18	Waste	✓							
19	Water						✓		

Summary and Recommendations

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

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

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

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

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

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

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

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

Full scoring assessment available upon request.

OPTION 5: NEW SETTLEMENT GROWTH

New freestanding 'Garden Village' settlement. There is no location identified with this option. A new settlement could be located anywhere within the borough.

Sustainability Objective		Score							
Number	Topic	?	---	--	-	0	+	++	+++
1	Air	✓							
2	Biodiversity				✓				
3	Business Growth								✓
4	Climate Change					✓			
5	Deprivation			✓					
6	Education				✓				
7	Employment	✓							
8	Equality		✓						
9	Health				✓				
10	Heritage						✓		
11	Housing							✓	
12	Land use		✓						
13	Landscape	✓							
14	Noise				✓				
15	Resources	✓							
16	Services & Facilities								✓
17	Travel							✓	
18	Waste	✓							
19	Water	✓							

Summary and Recommendations

This strategy would be accompanied by comprehensive master planning and would allow for provision of suitable economic floor space and support the growth of new businesses. Similarly, pockets of health deprivation are widely distributed across the borough so this score could be improved with careful design.

Concentrating a large quantity of development in one location brings about constraints such as loss of greenfield land. However, there are some benefits too, e.g. drawing development pressures away from sensitive locations (assuming a less sensitive location is chosen).

Developing further away from RTW is recommended to reduce the draw of the town and thus help to prevent a worsening of existing poor air quality. The extent of this negativity could be improved or worsened depending on the exact location of the new settlement.

The heritage environment would need careful consideration before a final location is chosen and the setting of any asset would need sympathetic design at an early stage.

It is recommended that the location chosen avoids all environmental constraints as far as possible. In addition, it is advised that the settlement is positioned outside of the Green Belt. In terms of landscape, building a new settlement from scratch provides the opportunity to develop a unified character and sense of place. It is advised that the settlement is positioned in an area where existing landscape character could be enhanced and the AONB is unaffected.

There is a high risk that such large amount of growth would create significant movements in new locations and thus warrant a new Important Area for Road Noise (IARN). It is hoped that this effect can be lessened with careful design.

Waste and resources would be considered through DM policy so are not scored. Likewise, it is recommended that policy is developed to secure low fuel bills for populations at risk of fuel poverty. This could be incorporated into affordability criteria for new homes.

Full scoring assessment available upon request.

OPTION 6: BUSINESS AS USUAL (NO LOCAL PLAN)

This scenario is an alternative to the previous growth strategies in which no planned growth takes place. Only windfall sites provide for the development needs of the borough and thus not all needs may be met.

Sustainability Objective		Score							
Number	Topic	?	---	--	-	0	+	++	+++
1	Air			✓					
2	Biodiversity			✓					
3	Business Growth	✓							
4	Climate Change		✓						
5	Deprivation			✓					
6	Education		✓						
7	Employment	✓							
8	Equality	✓							
9	Health	✓							
10	Heritage			✓					
11	Housing						✓		
12	Land use			✓					
13	Landscape			✓					
14	Noise			✓					
15	Resources			✓					
16	Services & Facilities	✓							
17	Travel	✓							
18	Waste			✓					
19	Water	✓							

Summary and Recommendations

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

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

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

Full scoring assessment available upon request.

Question 2

Do you think there are any further reasonable alternatives to the five proposed growth strategy options that should be considered by the Sustainability Appraisal?

- 4.2.5 See section 5.2 for a discussion of the implications of these assessments and recommendations for improvement.

5 Conclusions and Recommendations

5.1 Local Plan Objectives

- 5.1.1 With regard to the compatibility testing in Section 4.1, there are several reasons for the incompatibilities shown in Table 5 and Table 6). These relate largely to the lack of guarantee that is provided for protection and conservation of environmental features such as biodiversity, landscape, resources and water, and also the difficulty of meeting development needs while simultaneously reducing energy use and improving air quality.
- 5.1.2 To improve compatibility of objectives, the following recommendations are made:
- Improve Local Plan Objective 1 by including reference to meeting development needs with consideration of the constraints in the borough and providing sufficient land for a mix of appropriate uses. Also, clarify whether development needs includes the non-built environment (in the context of Local Plan Objective 6)
 - Improve Local Plan Objective 2 by removing wording “*seek to*” protect so sentence reads as simply “*to protect and enhance*”
 - Improve Local Plan Objective 4 by making reference to meeting needs within the context of a constrained borough
 - Improve Local Plan Objective 6 by making reference to making improvements to the health and wellbeing of residents
 - Improve Local Plan Objective 8 by including reference to sustainable and active transport methods
- 5.1.3 If all the above recommendations were implemented, the compatibility of Local Plan Objectives 1 (meet development needs) and 4 (deliver housing needs) could be improved. Likewise, the compatibility of Sustainability Objectives 1 (air), 2 (biodiversity), 4 (climate change and energy), 9 (health and wellbeing), 10 (land use), 11 (landscape) and 17 (travel) could be improved.

5.2 Growth Strategy Options

Stage B3

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

Table 7. Comparison of scores for growth strategy options

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

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

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

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

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

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

Stage B4

Growth Strategy 1:

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

Growth Strategy 2:

- As for Growth Strategy1 and ensure development in rural locations is accompanied by improvements to services, facilities and transport to turn the services and facilities, and travel objectives positive.

Growth Strategy 3:

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

Growth Strategy 4:

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

Growth Strategy 5:

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

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

Growth Strategy 4:

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

Growth Strategies 1 – 4:

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

Growth Strategies 2 – 3:

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

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

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

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

5.2.7 It can be seen that these improvements ensure that all strategies are dominated by positive scores and no objectives are now scored as unknown or mixed. In this sense, the most preferred option with the highest number of positive scores and lowest number of negative scores becomes Growth Strategy 5, and the least preferred option becomes Growth Strategy 3.

5.2.8 However, it is unlikely that Growth Strategy 5 would be able to provide for the full housing

needs of the borough; thus an approach that combines the principles of other strategies could be adopted. Should this be considered, the remaining negative impacts resulting from Growth Strategy 5 could be addressed. At present, the objectives of biodiversity, education, equality and land use still score negatively for Growth Strategy 5. While the scores for biodiversity and land use remain negative across Growth Strategy Options 1-4, those for education and equality could be improved by adopting an additional scaled-down version of Growth Strategy 4 (the second best strategy).

- 5.2.9 Growth Strategies 1-3 produced largely similar outcomes, with Growth Strategy 3 being slightly less favourable overall.

5.3 Recommendations for new Local Plan

- 5.3.1 As result of the sustainability appraisal work undertaken at Issues and Options stage, various recommendations have been made. These are summarised as follows:

- Adjust the wording of the eight Local Plan Objectives as suggested in paragraph 5.1.2
- Follow all suggestions for mitigating the adverse effects detailed in paragraph 5.2.4
- Following all suggestions for maximising the beneficial effects detailed in paragraph 5.2.5
- Assuming the above recommendations are implemented, adopt Growth Strategy 5 as the preferred option, with elements of Growth Strategy 4 making up any shortfall in development needs.

Question 3

Do you have any comments regarding the way the scoring has been interpreted and the conclusions and recommendations that have been made in Chapter 5?

6 Monitoring Effects

Stage B5

6.1 Overview of significant effects

- 6.1.1 The significant effects of implementing the plan will depend upon which of the five growth strategy options is preferred. A further discussion on this aspect will be contained in the Stage C Sustainability Report.

6.2 Proposed measures for monitoring

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

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

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

7 Consultation

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

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

- All town and parish councils in the borough
- Ashford Borough Council
- Campaign to Protect Rural England (as per request by Town Forum at Scoping Stage)
- Department for Environment, Food and Rural Affairs
- East Sussex Council Climate Change and Environment Team
- Forestry Commission
- High Weald Area of Outstanding Natural Beauty Unit
- Kent and Medway Biological Records Centre
- Kent County Council Climate Change and Environment Team
- Kent County Council Education Department
- Kent County Council Heritage Team
- Kent County Council Sustainable Urban Drainage Team
- Kent High Weald Partnership
- Kent Local Nature Partnership (subject to pre assessment check)
- Kent Reptile and Amphibian Group
- Kent Wildlife Trust
- Kent Youth Sport
- Lewes District Council
- Maidstone Borough Council
- Mid Sussex District Council
- Rother District Council
- Royal Society for the Protection of Birds
- Sevenoaks District Council
- Southern Water (as per request by KCC at scoping stage)
- South East Water
- Tandridge District Council
- Tonbridge & Malling Borough Council
- Upper Medway Internal Drainage Board
- Wealden District Council
- West Kent Primary Care Trust
- Woodland Trust

8 Next Steps

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

Further comments

Please provide any additional comments about this document.

Appendices

Appendix A

Indicators Used for Scoring Sustainability Objectives

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

Topic	Objective	Indicators Does the Policy/Plan/Objective.....?
Air	Reduce air pollution	...help meet NO ₂ and PM ₁₀ targets along the A26 in Royal Tunbridge Wells?
		...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options?
		...promote forms of active travel including cycling and walking?
		...help reduce premature deaths from poor air quality (cause by PM _{2.5})?
Biodiversity	Protect and enhance biodiversity and the natural environment	...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA and undesignated habitat)?
		...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations?
		...support work to improve condition of SSSIs?
Business Growth	Encourage business growth and competitiveness	...help support existing business and the growth of new businesses?
		...support growth of the local economy from professional and financial services, health and education, and construction-related activities.
		...prevent loss of economic floor space in preference for housing and other non employment generating used within Key Employment Areas and other well located employment sites (where appropriate)?
		...recognise and help develop the rural economy?
Climate Change & Energy	Reduce carbon footprint and adapt to predicted changes	...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures?
		...support reduction in carbon and energy so targets are consistently met?
		...support opportunities to utilise biomass in the borough?
		...support opportunities to install community heating schemes?
Deprivation	Reduce poverty and assist with regeneration	...address pockets of deprivation and encourage regeneration?
		...reduce rates of fuel poverty?
Education	Improve educational attainment and enhance the skills base	...meet demand for school places?
		...continue to support a high proportion of highly qualified residents?
Employment	Facilitate and support employment opportunities	...improve employment opportunities in key wards?
Equality	Increase social mobility and inclusion	...improve physical activity rates for low income population groups?
		...improve social mobility problems caused by selective grammar schools?
Health	Improve health and wellbeing, and reduce health inequalities	...meet demand for elderly care services?
		...improve physical activity rates for at risk population groups?
		...address pockets of health deprivation?
		...help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers?
		...meet need for green open space and recreation facilities?
		...ensure residents can access heritage assets?
Heritage	Preserve and	...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance?

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

Appendix B

Detailed Scoring for Growth Strategy Option 1

Sustainability Objective	Does the policy/ allocation/ objective.....	Score								Weight	Final Score	Decision Making Criteria
		--- Very Negative	-- Negative	- Slightly Negative	? Unknown or Mixed	0 Neutral	+ Slightly Positive	++ Positive	+++ Very Positive			
Air	Reduce air pollution	...help meet NO2 and PM10 targets along the A26 in Royal Tunbridge Wells?	Significantly increases traffic in AQMA e.g. >50 vehicles per day	Increases traffic in AQMA e.g. 10 - 50 vehicles per day	Slightly increases traffic in AQMA e.g. <10 vehicles per day	e.g. reduces private car use but increases business or commercial traffic.	Neither increases nor reduces traffic in AQMA	Slightly reduces traffic in AQMA e.g. <10 vehicles per day	Reduces traffic in AQMA e.g. 10-50 vehicles per day	Significantly reduces traffic in AQMA e.g. >50 vehicles per day	High Legislatively driven.	Concentrating most development in RTW and SB means increased traffic in AQMA.
		...support opportunities for improving air quality such as low emission vehicles, expansion of existing car club and other shared transport options?	Removes support for improving air quality with significant negative consequences	Removes support for improving air quality	Removes support for improving air quality with minimal negative consequences	e.g. supports local car club but also increases parking for private cars	Neither offers nor removes support for improving air quality	Provides support for improving air quality with minimal benefits	Provides support for improving air quality	Provides support for improving air quality with significant benefits	0	Development in RTW/SB could collect Section 106 money for car club etc. but service still bedding in. Also, EV charge points could be added but not many people drive EV yet so would take time to see any benefit. Measures could be introduced to other main settlements for the first time.
		...promote forms of active travel including cycling and walking?	Cycling and walking discouraged e.g. >50 less cyclists or walkers	Cycling and walking discouraged e.g. 10-50 less cyclists or walkers	Cycling and walking discouraged but with minimal effects e.g. <10 cyclists or walkers	e.g. walking promoted but cycling discouraged	Cycling and walking not promoted nor discouraged	Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers	Cycling and walking promoted e.g. 10-50 new cyclists or walkers	Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers	0	Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport in more urban areas is already relatively good so benefit may be small.
		...help reduce premature deaths from poor air quality (cause by PM2.5)?	Sensitive receptors inside AQMA	Sensitive receptors in area with busy traffic	Sensitive receptors in area with some traffic	e.g. relocates sensitive receptors into area of equally poor air quality	Health of sensitive receptors unchanged	Relocates sensitive receptors into area with less traffic	Relocates sensitive receptors into area with less traffic	Relocates sensitive receptors in area with significantly less traffic and outside AQMA	High Lives at stake.	Strategy does not specify exact locations for sensitive receptors. However, with growth focussed in RTW and SB and support for improving air quality in it's infancy, it is highly likely that existing sensitive receptors will experience higher rates of poor air quality
Biodiversity	Protect and enhance biodiversity and the natural environment	...protect and enhance sites of biodiversity value across the borough (LNR, LWS, SLNCV, RNR, BOA and undesignated habitat)?	Full loss of a site of biodiversity value	Partial loss of a site of biodiversity value	Degradation of a site of biodiversity value	e.g. improvements to one site come at expense of another site	No impact upon sites of biodiversity value	Protection of site of biodiversity value	Protect and improve site of biodiversity value	Protect, improve and increase size/function of site of biodiversity value	0	Such a large quantity of development across the borough is highly likely to cause losses for biodiversity. Urban focus may help but brownfield sites are limited. It is recommended that mitigation schemes are devised.
		...avoid inappropriate development in the Ashdown Forest protection zone and ensure compliance with the Habitat Regulations?	Likely significant effects definite, no effective mitigation available	Likely significant effects probable, mitigation may be ineffective	Likely significant effects possible, mitigation likely to be effective	e.g. effectiveness of mitigation available to prevent likely significant effects is unknown	No impact upon the Ashdown forest	No or insignificant impact upon the Ashdown Forest and provision of some green space	No or insignificant impact upon the Ashdown Forest disturbance and provision of SAMMS	No or insignificant impact upon the Ashdown Forest disturbance and provision of SANGS	High Ashdown Forest is of international significance	Focussing a large amount of development in RTW makes impacts upon the Ashdown Forest more likely. Funding for SAMM could be collected though.
		...support work to improve condition of SSSIs?	Full loss of a SSSI	Partial loss of a SSSI	Degradation of a SSSI	e.g. a combination of negative and positive impacts	Neither improves nor contributes to a decline in the condition of SSSIs	Protection of SSSI	Protect and improve	Protect, improve and increase size/function	High SSSIs are of national significance	Difficult to score until know exact location of development but assumed that al SSSI in borough would be protected as a minimum.
Business Growth	Encourage business growth and competitive-ness	...help support existing business and the growth of new businesses?	- Loss of >500m2 floor space/premises suitable for new businesses - Extremely slow broadband - Extremely limited transport options - Extremely limited availability of staff	- Loss of 250m2 - 500m2 floor space/premises suitable for new businesses - Very slow broadband speed - Very limited transport options - Limited availability of staff	- Loss of up to 250m2 floor space/premises suitable for new businesses - Slow broadband speed - Limited transport options - Limited availability of suitable staff	e.g. suitable premises but no fast broadband	No impact on new business survival	- Gain of up to 250m2 floor space/premises suitable for new businesses - Reasonable broadband speed - Small range of transport options - Small range of suitable staff	- Gain of 250m2 - 500m2 floor space/premises suitable for new businesses - Good broadband speed - Wide range of transport options - Wide range of suitable staff	- Gain of >500m2 floor space/premises suitable for new businesses - Fast broadband speed - Very wide range of transport options - Very wide range of suitable staff	Less weight TW is better than national average (see Economic Needs Assessment)	Focusing development in more urban towns is likely to mean a wider range of suitable staff and transport options. Broadband is more likely to be of a reasonable speed and existing premises are more likely to be available.
		...support growth of the local economy from professional and financial services, health and education, and construction-related activities.	Loss of > 500m2 floor space	Loss of 250m2 - 500m2 floor space	Loss of < 250m2 floor space	e.g. support for one industry associated with a loss for another industry	No impact on wholesale, health and finance industries	Gain of < 250m2 floor space	Gain of 250m2 - 500m2 floor space	Gain of > 500m2 floor space	0	Need to know what type of development is proposed to score accurately. Development in urban areas is likely to support these industries (staff & transport). However, mixed picture as loss of economic floor space may occur in preference to housing whereas construction-related activities are likely to be supported by the significant development needed.
		...prevent loss of economic floor space in preference for housing and other non employment generating uses within Key Employment Areas and other well located employment sites?	> 500m2 economic floor space lost in preference for housing	250m2 - 500m2 economic floor space lost in preference for housing	< 250m2 economic floor space lost in preference for housing	e.g. viability of existing economic floor space unknown	No impact on economic floor space or economic floor space lost in non-viable location	Housing development preserves existing economic floor space	Housing development preserves existing or provides for more economic floor space	Housing development preserves existing and provides for additional economic floor space	0	Housing demands are extremely high and residential development is a more viable option for developers. It seems likely that some economic floor space will be sacrificed (as has been the trend up to now). Developing in the urban areas is likely to exacerbate this trend as more economic floor space is located here. A policy would be needed to prevent this happening.
		...recognise and help develop the rural economy?	Rural economy lost and prevented from developing in the future	Loss for the rural economy	Rural economy diminished	e.g. support for one industry associated with a loss for another industry	No impact on the rural economy	Rural economy protected	Rural economy protected and expanded	Rural economy protected and significantly expanded	0	Developing predominantly in urban areas is unlikely to help the rural economy but also may not cause harm as existing economy is not lost.
Climate Change & Energy	Reduce carbon footprint and adapt to predicted changes	...relieve the pressures of climate change such as extreme weather on agriculture, health services, transport network, ecology etc. through adaptation measures?	Adaptation measures excluded with significant negative consequences	Adaptation measures excluded	Adaptation measures excluded but with minimal negative consequences	Adaptation measures have negative consequences e.g. drought resilient plants are preferable to invasive species	Adaptation is not possible or no climate change pressures exist in that location	Adaptation measures incorporated but with minimal benefits	Adaptation measures incorporated	Adaptation measures incorporated with significant benefits	0	Difficult to score until know exact details of development

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		--- Very Negative	-- Negative	- Slightly Negative	? Unknown or Mixed	0 Neutral	+ Slightly Positive	++ Positive	+++ Very Positive				
	...support reduction in carbon and energy so targets are consistently met? [Nb. short term effects e.g. construction related are considered by Objective 15: Resources]	Increases carbon significantly compromising reduction target	Increases carbon making reduction target difficult to achieve	Maintains status quo. Increases carbon slightly but reduction target is still achievable	e.g. reduces carbon from domestic sources but increases carbon from transport	Neither increases nor reduces carbon	Reduces carbon but unlikely to meet annual target	Meets annual carbon reduction targets	Exceeds annual carbon reduction targets	High Targets are currently not being met.		Building a large number of new homes is likely to increase carbon and energy demands significantly. However, concentrating the development in urban areas will help reduce transport related carbon	
	...support opportunities to utilise biomass in the borough?	Biomass opportunities discouraged with significant negative consequences	Biomass opportunities discouraged	Biomass opportunities discouraged with minimal negative consequences	e.g. support for biomass in one location removes opportunities in another location	Neither supports nor discourages biomass	Biomass opportunities supported	Biomass opportunities supported and realised	Biomass opportunities supported and realised with significant benefits	0		Difficult to score until know exact details of development. However, developing predominantly in urban areas will make use of biomass difficult as this is where air quality is poorest.	
	...support opportunities to install community heating schemes?	Community heating opportunities discouraged with significant negative consequences	Community heating opportunities discouraged	Community heating opportunities discouraged with minimal negative consequences	e.g. support for biomass in one location removes opportunities in another location	Neither supports nor discourages community heating	Community heating opportunities supported	Community heating opportunities supported and realised	Community heating opportunities supported and realised with significant benefits	Low Opportunities are limited		RTW was identified as having some potential for community heating in the pre-feasibility study completed by KCC. However, further studies would be required.	
Deprivation	Reduce poverty and assist with regeneration	...address pockets of deprivation and encourage regeneration?	Significant regeneration diverted away from a pocket of severe deprivation	Some regeneration activates diverted away from pocket of deprivation	Small amount of regeneration activates diverted away from pockets of deprivation	e.g. regeneration adjacent to a pocket of deprivation may trigger future regeneration but there is no guarantee	No impact upon pockets of deprivation	Small amount of regeneration in a pocket of deprivation	Some regeneration in a pocket of deprivation	Significant regeneration in a pocket of severe deprivation e.g. major housing or retail development	0	++	Pockets of deprivation are concentrated in urban areas. Developing here increases the likelihood that these could be improved.
		...reduce rates of fuel poverty?	Energy demand increase of >50%	Energy demand increase of 10% - 50%	Energy demand increase of<10%	e.g. energy saving principles incorporated but users unlikely to be affected by fuel poverty	No impact on fuel poverty	Energy reductions of <10%	Energy reductions of 10% - 50%	Energy reductions of >50%	0		Difficult to score until know exact details of development. Recommend that a policy is developed to secure low fuel bills for populations at risk of fuel poverty. Could be incorporated into affordability criteria for new homes.
Education	Improve educational attainment and enhance the skills base	...meet demand for school places?	Will increase demand by >50%	Will increase demand by 10-50%	Will increase demand by <10%	New school proposed in long term but impact of demand will be felt in short term	No impact on school places or demand for new places can be accommodated	Will reduce demand by <10%	Will reduce demand by 10-50%	Will reduce demand by >50%	0	--	Assuming development will address both existing and future demands, no impact expected.
		...continue to support a high proportion of highly qualified residents?	Complete removal of significant support	Reduces support	Small reduction in support	e.g. support for higher education comes at expense of further education	No impact on highly qualified residents	Provides a small amount of support	Provides support	Provide significant support	0		Difficult to score until know exact details of development
Employment	Facilitate and support employment opportunities	...improve employment opportunities in key wards?	In key wards... - Loss of a significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Extremely poor access to transport - Very poor opportunities for developing new skills	In key wards... - Loss of a number of permanent employment opportunities provided e.g. 10- 50 new jobs - Very poor access to transport - Poor opportunities for developing new skills	In key wards... - Loss of a small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Poor access to transport - Very poor opportunities for developing new skills	e.g. job opportunities at risk but not certain	No impact on employment opportunities in key wards	In key wards... - A small number of employment opportunities provided e.g. less than 10 permanent jobs or up to 50 temporary jobs - Reasonable access to transport - Reasonable opportunities for developing new skills	In key wards... - Number of permanent employment opportunities provided e.g. 10- 50 new jobs - Good access to transport - Good opportunities for developing new skills	In key wards... - Significant number of permanent employment opportunities provided e.g. 50 new jobs or more - Very good access to transport - Very good opportunities for developing new skills	LOW Unemployment in borough is very low generally	++	Developing in more urban areas mean access to transport and skills is more likely. Although RTW is much better than Hawkhurst/Cranbrook for transport.
Equality	Increase social mobility and inclusion	...improve physical activity rates for low income population groups?	A significant number of opportunities affecting the lowest income population groups missed	Opportunities missed	A small number of opportunities missed	e.g. support in one parish comes at expense of support elsewhere	No impact on physical activity rates	A small number of opportunities provided	Opportunities provided	A significant number of opportunities provided that benefit the lowest income population groups	0	+++	Developing in these locations matches up with pockets of income deprivation and so increases likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces.
		...improve social mobility problems caused by selective grammar schools?	Provision for a new grammar school	Expansion of an existing grammar school	Increase in catchment area of existing grammar school	e.g. grammar school dedicates places for low income families	No impact on selective education	Increase in catchment area of existing non-selective school	Expansion of an existing non-selective secondary school	Provision for a new non-selective secondary school	0		Difficult to score until know exact details of development
Health	Improve health and wellbeing, and reduce health inequalities	...meet demand for elderly care services?	Does not meet existing demand and significantly increases future demand	Does not meet existing demand and increases future demand	Does not meet existing demand	e.g. meets existing demand at expense of future demand or vice versa	Does not impact upon elderly care services	Meets existing demand	Meetings existing demand and reduces future demand	Meet existing demand and significantly reduces future demand	HIGH Growing elderly population	+	Difficult to score until know exact details of development
		...improve physical activity rates for at risk population groups?	Significantly reduces changes for improvement of physical activity rates for at risk populations	Reduces chances for improvement of physical activity rates for at risk populations	Slightly reduces chances for improvement of physical activity rates for at risk populations	e.g. increasing physical activity rates for some at risk populations comes at the expense of other at risk populations	Neither increases nor reduces physical activity rates	Slightly increases physical activity rates for at risk populations	Increases physical activity rates for at risk populations	Significantly increases physical activity rates for at risk populations	0		The majority of inactive groups are located in main settlements (but not all) so developing here increases the likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces.

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		--- Very Negative	-- Negative	- Slightly Negative	? Unknown or Mixed	0 Neutral	+ Slightly Positive	++ Positive	+++ Very Positive				
	...address pockets of health deprivation?	Significantly reduces changes for improvement of pockets of health deprivation	Reduces chances for improvement of pockets of health deprivation	Slightly reduces chances for improvement of pockets of health deprivation	e.g. reduces or improves one area of health deprivation at the expense of a different area	Does not impact upon pockets of health deprivation	Will slightly improve or reduce pockets of health deprivation	Will improve or reduce pockets of health deprivation	Will significantly improve or reduce pockets of health deprivation	0		All the pockets are located in main settlements (except Benenden and Sandhurst) so developing here increases the likelihood that money and regeneration will be available to help. Assumption that development does not take away existing green spaces.	
	...help provide specialist health care or support services for asthma, stroke, mental illness and cancer sufferers?	Removes provision of specialist health care or support services and causes significant problems	Removes provision of specialist health care or support services	Removes provision of specialist health care or support services, but accessible services are still available	e.g. helps one illness at the expense of another illness	Does not impact upon specialist health care or support services	Helps with provision of specialist health care or support services but with minimal benefits	Helps with provision of specialist health care or support services	Significantly helps with provision of specialist health care or support services	0		Difficult to score until know exact details of development	
	...meet need for green open space and recreation facilities?	Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is both too far (more than twice recommended distance) and/or too small (less than half recommended size)	Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either too far (e.g. twice recommended distance) and/or too small (e.g. half recommended size)	Does not meet Accessible Natural Greenspace Standard. Nearest accessible open space is either slightly too far (less than twice recommended distance) and/or slightly too small (more than half recommended size)	e.g. Accessible Natural Greenspace is allocated to one population at the expense of a different population	Green open space and recreation facilities not relevant	Meets 1 or 2 Accessible Natural Greenspace Standards	Meets 3 or 4 Accessible Natural Greenspace Standards	Meets all Accessible Natural Greenspace Standards	HIGH TWBC is already behind on these standards		Assumption that development does not take away existing accessible green space, however, still seems unlikely that high demands for housing will provide sufficient new green space to meet these standards (which the Borough is already behind on). Also, urban areas are less likely to have green open space	
	...ensure residents can access heritage assets?	Significantly worsens or prevents access to heritage assets (e.g. severance of access route)	Worsens access to heritage assets (e.g. removes pedestrian access)	Slightly worsens access to heritage assets (e.g. pedestrian access route lengthened)	e.g. access is possible but other factors may prevent visits	Does not impact upon access to heritage assets	Slightly improves access to heritage asset (e.g. pedestrian access route shortened)	Improves access to heritage assets (e.g. provision for new modes of travel)	Significantly improves access to heritage assets (e.g. addition of new access route)	0		Best transport links are from/to main settlements. Although, Hawkhurst and Cranbrook not as good as RTW.	
Heritage	Preserve and enhance historical and cultural heritage assets	...protect sites, features, areas and settings of archaeological, historical and cultural heritage importance?	Significantly fails to protect, e.g. total demolition of a heritage asset, complete loss a significant contributor in historic area, complete loss of archaeological site, complete loss of element of setting which forms an important part of its significance.	Fails to protect, e.g. partial demolition of a heritage asset, removal of a part of a heritage asset that contributes strongly to significance, partial loss of element of setting that forms part of its significance.	Protection compromised, e.g., causes less than significant harm by partial demolition, removal of part of a heritage asset, or a structure that forms part of its setting.	Protection or enhancement possible but other policies could hinder, e.g. green belt designation, AONB, housing quotas, requirements for commercial use, potential for preventing reuse of historic buildings at risk.	No impact. Does not prevent or cause harm e.g. no impact on the special architectural or historic character of a building, structure or area, or any impact on archaeology	Protects heritage assets from harm or deterioration e.g. allows reuse of heritage assets which prevents deterioration or further harm, stabilises condition of heritage assets, a use which would allow for retention of setting , enables long term appropriate use of asset	Protects and enhances significance, e.g. allows restoration of historic features, setting, allows interpretation, removes detractors to its significance, enables long term optimum viable use	Provides significant enhancement e.g. use which allows for its retention if redundant, a complete restoration of a building at risk, complete restoration of an important part of a conservation area, removal of significantly harmful detractors.	High Assets and settings are often finite or hard to restore once lost	-	Focusing on built up areas would put pressure on the historic environment especially in RTW
		...provide a framework for a positive heritage strategy including enhancements in line with NPPF?	Significantly worse provision by the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements	Worsens provision by the historic environment for the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements	Prevents enhancement opportunities for and by the historic environment for one of the following: a) economic growth b) wellbeing c) tourism d) environmental enhancements	Provides potential for enhancement of and by the historic environment but other priorities could hinder	No opportunities for enhancement are available.	Slight enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements	Enhancement opportunities from the historic environment available for a) economic growth b) wellbeing c) tourism d) environmental enhancements	Significant enhancement opportunities from the historic environment for a) economic growth b) wellbeing c) tourism d) environmental enhancements	0		Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population)
Housing	Provide sufficient housing to meet identified needs	...meet identified needs for affordable housing?	No provision made for affordable housing and demands increased significantly	No provision made for affordable housing and demands increased	No provision made for affordable housing	e.g. affordable housing needs met in one site/phase/ location at the expense of another	No relevance to affordable housing	A small proportion of affordable housing needs met	Affordable housing needs partially met	Affordable housing needs met in (or near) full	High Housing demands in borough are not being met.		Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs. This strategy would not help address rural needs.
		...meet demand for housing suitable for older people downsizing?	No provision made for older persons housing needs and demands increased significantly	No provision made for older persons housing needs and demands increased	No provision made for older persons housing needs	e.g. older persons housing needs met in one site/phase/ location at the expense of another	No relevance to older persons housing needs	A small proportion of older persons housing needs met	Older persons housing needs partially met	Older persons housing needs met in full	High Housing demands in borough are not being met.	+	Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs.
		...meet demand for 2 and 3 bed market housing to suit expanding families?	No provision made for 2 and 3 bed housing needs and demands increased significantly	No provision made for 2 and 3 bed housing needs and demands increased	No provision made for 2 and 3 bed housing needs	e.g. 2 and 3 bed housing needs met in one site/phase/ location at the expense of another	No relevance to 2 and 3 bed housing demands	A small proportion of demand for 2 and 3 bed market housing met	Some of the demand for 2 and 3 bed market housing met	Demand for 2 and 3 bed market housing met in full	High Housing demands in borough are not being met.		Building large number of new homes provides opportunities to ensure needs are met. Demand in urban areas will probably be higher (larger population). Not clear yet whether there is enough land available to meet all housing needs.

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		--- Very Negative	-- Negative	- Slightly Negative	? Unknown or Mixed	0 Neutral	+ Slightly Positive	++ Positive	+++ Very Positive			
Land use	...make allowances in housing targets due to environmental constraints in the borough?	No allowances made and constraints not given weight	No allowances made and constraints given limited weight	No allowances made but constraints given moderate weight	e.g. allowances made in one location at the expense of another	Not relevant to housing targets	Limited allowances made	Some allowances made	Significant allowances made	0		Urban development approach would help a little as development in RTW is outside of AONB. However, historic environment more constraining in RTW, and Cranbrook and Hawkhurst within AONB and large quantity of development here will be negative. Also, Paddock Wood flooding issues not avoided. Likely to need to release Green Belt land.
	...protect Green Belt?	Detracts from all of the 5 purposes of the Green Belt	Detracts from 3-4 of the purposes of the Green Belt	Detracts from 1-2 of the purposes of the Green Belt	e.g. development is not on Green Belt but may benefit or detract from adjacent Green Belt	No impact upon Green Belt or impact is on an area of land that serves none of the 5 purposes of Green Belt	Respects the 5 purposes of the Green Belt	Respects the 5 purposes of the Green Belt and enhances beneficial use	Respects the 5 purposes of the Green Belt and significantly enhances beneficial use	0		Development in GB would be needed. Coalescence of Pembury and RTW may be a problem. GB review should ensure that urban and derelict land is regenerated in preference to high quality countryside.
	...develop on previously developed land in preference to greenfield land?	>50% of development located on greenfield land	10%-50% of development located on greenfield land	Up to 10% of development located on greenfield land	e.g. previous use of land unknown	No impact on land type	Development entirely on previously developed land and adjacent to greenfield	Development entirely on and adjacent to previously developed land	Development located entirely on and surrounded by previously developed land	High. Housing white paper suggests great weight should be applied to suitable brownfield sites	--	Developing primarily in urban areas increases likelihood of finding brownfield sites. However, extremely unlikely to be enough to enable such a large quantity of development.
	...prioritise development on lower grade agricultural soils?	>20ha of development on best and most versatile soils	<20ha of development on best and most versatile soils	Development on agricultural soils of any grade	e.g. grading of agricultural soil unknown	No impact on agricultural soils or no change to soil grading	Protect agricultural soils of any grade	Protect and improve <20ha of best and most versatile soils	Protect and improve >20ha of best and most versatile soils	0		Difficult to score without exact detail of locations. However, prioritising urban development reduces the risk of permanently losing high grade soils.
Landscape	...protect and enhance the High Weald AONB and historic landscape?	1) Near full or full loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/ pattern: - near completely or completely out of keeping with existing settlement	1) Partial loss of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath 2) Scale/setting/ pattern: - out of keeping with existing settlement	1) Degradation of: - exposed geology - gills, streams, ponds - woodland - fields and heath - routeway 2) Scale/setting/ pattern: - slightly out of keeping with existing settlement	e.g. exposed geology protected but pond degraded or one routeway diverted and another restored or improvements to settlement edge but development is still out of scale	No impact on the AONB	1) Protection of: - exposed geology - gills, streams, ponds - routeway - woodland (W1) - fields and heath - routeway 2) Scale/setting/ pattern: - generally in keeping with existing settlement - no significant harm	1) Protection & improvement of: - exposed geology - gills, streams, ponds - routeway - woodland - fields and heath - routeway 2) Scale/setting/ pattern: - in keeping with existing settlement - no harm	1) Protection, improvement & increase size/function of: - exposed geology - gills, streams, ponds - routeway - woodland (W2) - fields and heath - routeway 2) Scale/setting/ pattern: - in keeping with and enhances existing settlement	Great weight as per NPPF		Urban development approach would help a little as development in RTW is outside of AONB. However, Cranbrook and Hawkhurst within AONB and large quantity of development here likely to be negative.
	...protect and enhance ancient woodland and provide opportunities for management of new and existing woodland that would benefit local and global environment, landscape, biodiversity, recreation, tourism, jobs, health & wellbeing, water quality, flooding?	1) Near full or full loss of ancient woodland 2) Near full or full loss of management opportunities or access	1) Partial loss of ancient woodland 2) Partial loss of management opportunities or access	1) Degradation of ancient woodland 2) Scaled down management opportunities or access	e.g. recreation management conflicts with biodiversity management	No impact on ancient woodland	1) Protection of ancient woodland 2) Improvement to existing management opportunities or access	1) Protection and enhancement of ancient woodland 2) Addition of management opportunities or access	1) Protection, enhancement and improve function of ancient woodland 2) Significant addition of management opportunities or access	High AW is a finite habitat	-	Difficult to score without exact locations of development. However, NPPF para 118 suggests loss or deterioration of ancient woodland would be refused (unless benefits outweigh the loss). Recent Housing White Paper also places emphasis on protecting ancient woodland.
	...strengthen Green Infrastructure?	Near full or full loss of GI and/or full loss of management opportunities	Partial loss of GI and/or partial loss of management opportunities or access	Degradation of GI and/or scaled down management opportunities or access	e.g. a combination of negative and positive impacts	No impact on GI or no net loss of GI	Protection of GI and/or improvement to existing management opportunities	Protection and enhancement of GI and/or addition of management opportunities	Protection, enhancement and increase size/function of GI and/or significant addition of management opportunities	0		Difficult to score without exact detail of development locations. However, assumed that there would be no net loss of GI.
	...protect and enhance landscape and townscape character and quality?	High adverse impacts	Moderate adverse impacts	Minor adverse impacts	e.g. a combination of negative and positive impacts	No visual impacts or impact on landscape and townscape character and quality	Minor positive impacts	Moderate positive impacts	High positive impacts	0		Focussing a large amount of development in RTW/SB relieves some pressure on protected landscape but would put increased pressure on townscape character. Also, towns of HH and CB are both in AONB. Policy to ensure high quality and sympathetic design is required.
Noise	...consider noise pollution in Important Areas for Road Noise?	- Increase road noise dramatically in an IARN - Position sensitive receptors in an IARN	- Increase road noise in an IARN - Develop large number of residential housing in an IARN	- Increase road noise slightly in an IARN - Develop residential housing in an IARN	e.g. development is adjacent to an IARN and may contribute to worsening effects	No impact upon an IARN	- Reduce road noise slightly in an IARN - Provide noise mitigation for residents located in an IARN	- Reduce road noise in an IARN - Relocate number of sensitive receptors away from an IARN	- Reduce road noise dramatically in an IARN - Relocate large number of sensitive receptors away from an IARN	HIGH Great control over this issue and more certainty	--	Areas are scattered across borough but many are in RTW where a large proportion of housing would occur. The A229 near Cranbrook also has an IARN. There is a risk that such large amount of growth would create significant movements in new locations and thus warrant a new IARN.
	...consider noise pollution from aircraft and trains?	- Position sensitive receptors in flight path or adjacent to main railway	- Develop residential housing in main flight path (20 flights per day or more) or adjacent to main	- Develop residential housing on edge of flight path (5-20 flights per day) or near to main railway	e.g. flight path subject to change	No impact upon flight path	- Provide noise mitigation for residents located in flight path or near to main railway	- Relocate number of sensitive receptors away from edge of flight path or adjacent to railway	- Relocate large number of sensitive receptors away from main flight path or adjacent to railway	0		Focusing large amount of development in RTW would increase likelihood of needing to build in flight path. Paddock Wood rail line is also a noise sensitive area.

Sustainability Objective		Does the policy/ allocation/ objective.....	Score								Weight	Final Score	Decision Making Criteria	
			---	--	-	?	0	+	++	+++				
			Very Negative	Negative	Slightly Negative	Unknown or Mixed	Neutral	Slightly Positive	Positive	Very Positive				
			railway											
Resources	Reduce the impact of resource consumption	...prevent unsustainable demolition and rebuild projects?	Demolition and rebuild required	Demolition and rebuild encouraged	Demolition and rebuild promoted slightly	e.g. demolished building is unusable and new build is extremely sustainable	Demolition and rebuild not applicable	Demolition and rebuild reduced slightly	Demolition and rebuild reduced	Demolition and rebuild prevented	0	?	Difficult to score without exact detail of locations	
		...improve use of responsible sourced and low environmental impact materials e.g. traditional weatherboarding?	Responsible sourcing/low impact materials prohibited	Responsible sourcing/low impact materials strongly discouraged	Responsible sourcing/low impact materials discouraged slightly	e.g. suitable low impact/responsibly sourced material does not currently exist	Responsible sourcing//low impact materials not applicable	Responsible sourcing/low impact materials encouraged slightly	Responsible sourcing/low impact materials strongly encouraged	Responsible sourcing/low impact materials mandatory	0		This aspect would be considered through DM policy. Not possible to score at strategy level.	
Services and facilities	Improve access to and range of key services and facilities	...support the contribution to the local economy from tourism?	Tourism strongly discouraged e.g. closure of major attraction	Tourism discouraged	Tourism discouraged slightly	e.g. opening a new attraction reduces visitors to an existing attraction	Tourism not relevant	Tourism supported slightly	Tourism supported	Tourism supported strongly e.g. opening of major attraction	Low Tourism contributes a relatively small amount to local economy	++	Developing in urban areas more likely to increase visitor numbers to easy to reach attractions e.g. the Pantiles	
		...support superfast broadband connectivity in final 5% of the borough?	Development in all of the locations of borough not connected to superfast broadband	Development in some of the locations of borough not connected to superfast broadband	Development in a few of the locations of borough not connected to superfast broadband	e.g. speed for a particular location is not known	No impact upon broadband speeds in areas of need.	Development that guarantees superfast connection in a few of the locations of borough not currently connected	Development that guarantees superfast connection in a some of the locations of borough not currently connected	Development that guarantees superfast connection in all of the locations of borough not currently connected	0		Majority of urban areas will already have superfast. However, there are parts of HH that do not yet have superfast.	
		...improve range of services and facilities especially in rural settlements?	Loss and poor range of existing key services or facilities	Loss or poor range of existing key services or facilities	Loss or limited range of existing key services or facilities	e.g. improvements in one service and loss of another service	Not relevant to provision of services and facilities	Gain or good range of existing services or facilities	Gain or near full range of existing key services or facilities nearby	Gain or full range of existing key services and wide range of further services and facilities nearby	High. Critical issue when determining where to develop. More weight if a rural settlement.		Services in urban areas already suitable except lack of train station for CB and HH, and no secondary school for HH.	
		...retail and leisure growth? (study underway)	Loss and poor range of existing retail and leisure facilities	Loss or poor range of existing retail and leisure facilities	Loss or limited range of existing retail and leisure facilities	e.g. improvements in one facility and loss of another facility	Not relevant to provision of retail and leisure facilities	Gain or good range of existing retail and leisure facilities	Gain or near full range of existing retail and leisure facilities	Gain or full range of existing retail and leisure facilities and wide range of further retail and leisure facilities nearby	0		Sports centres and wide range of shops in all urban areas except HH. However, HH has a cinema.	
		...improve access to services and facilities especially in rural settlements?	Nearest services or facilities only accessible by private car OR existing accessibility worsened significantly	Public transport needed to access services and facilities is infrequent or unreliable OR existing accessibility worsened	Key services and facilities accessible only by public transport OR existing accessibility worsened slightly	Access route undetermined	Not relevant to access to services and facilities	Key services and facilities are within desirable walking distance OR existing accessibility improved slightly	Key services and facilities are within desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved	Key services and facilities are within half the desirable walking distance and can be reached safely and comfortably on foot OR existing accessibility improved significantly	High A critical issue when determining where to develop. More weight if a rural settlement.		Developing primarily in urban areas means most services are easily accessible on foot. Although, HH and CB do not have easily accessible train station.	
		...support priority transport projects?	Significant negative impact e.g. multiple projects inhibited	Some negative impact e.g. severe delays	Slight negative impact e.g. project delayed	e.g. one project supported at the expense of another	Priority transport projects unaffected	Minimal support e.g. project recognised or land reserved	Support given to promote one or more projects	Significant support e.g. multiple projects promoted or accelerated timescales	0		Building in urban areas could help public space improvements in RTW and speed restriction projects.	
Travel	Improve travel choice and reduce the need to travel by private vehicle	...prioritise easy access to train stations within and outside the borough?	Access to train station very difficult (e.g. 10miles+ or no public transport)	Access to train station difficult (e.g. 5-10 miles or very limited public transport)	Access to train station inconvenient (e.g. 3-5 miles or limited public transport)	e.g. easy access but unlikely to be train users	Access to train stations not applicable	Convenient access to train station by private car	Convenient access to train station by public transport	Convenient access to train station by foot	0	+	Access to train stations more likely when concentrating development in most urban areas. However, Etchingham station not easily accessible from HH without private car.	
		...improve rural bus services and retain viability of urban bus services?	Significant negative impact on bus services (e.g. removal of a bus route)	Bus services worsened (e.g. loss of multiple bus stops or several services per week)	Bus services worsened slightly (e.g. loss of one bus stop or service per week)	e.g. improvements to one service or route come at expense of another	Bus services unaffected	Opportunities to improve bus services available (e.g. new bus stop or additional service each week)	Improvements to bus services (e.g. addition of multiple bus stops or services per week)	Significant positive impact on bus services (e.g. addition of new route)	LOW Bus use is generally unpopular in borough		Improvements to urban bus services brought about by increased development could be countered by lack of investment in rural areas (and thus associated bus services).	
		...support opportunities for active travel including cycling and walking?	Cycling and walking discouraged e.g. 50+ less cyclists or walkers	Cycling and walking discouraged e.g. 10-50 less cyclists or walkers	Cycling and walking discouraged but with minimal effects e.g. 10 less cyclists or walkers	e.g. walking promoted but cycling discouraged	Cycling and walking not promoted nor discouraged	Cycling and walking promoted with minimal benefits e.g. < 10 new cyclists or walkers	Cycling and walking promoted e.g. 10-50 new cyclists or walkers	Cycling and walking promoted with significant benefits e.g. >50 new cyclists or walkers	0		Development in main towns means active travel could be more likely i.e. lots of services and facilities within easy reach. However, public transport would also be better than rural areas so benefit may be small.	
		...support continued decline in household waste reduction?	Creates barriers to household waste reduction e.g. large number of new homes with no commitment to reduction	Likely to negatively affect the continued decline in household waste e.g. addition of significant number of new homes	Maintains status quo	e.g. causes increase in one stream of household waste and decline in another	Household waste unaffected	Household waste reduction considered	Some commitment and ideas for supporting household waste reduction	Strong commitment and innovative ideas for supporting household waste reduction	0		Likely to be an increase with large quantities of development. Assumption that a LP policy would prevent very large quantities	

Sustainability Objective	Does the policy/ allocation/ objective.....	Score								Weight	Final Score	Decision Making Criteria
		--- Very Negative	-- Negative	- Slightly Negative	? Unknown or Mixed	0 Neutral	+ Slightly Positive	++ Positive	+++ Very Positive			
Water	...improve rates of household waste diverted from landfill?	100% waste to landfill	Approximately 50% waste to landfill	Some waste to landfill e.g. 10%	e.g. reduced waste to landfill possible but may not be achieved in practise e.g. quantity of waste produced will depend on reputation of contractor used	No waste will occur or household waste not relevant	Some waste diverted from landfill e.g. 10%	Approximately 50% waste diverted from landfill	Zero waste to landfill can be achieved.	0		This aspect would be considered through DM policy. Not possible to score at strategy level.
	...reduce construction waste?	Construction waste increased significantly	Construction waste increased	Construction waste increased slightly		No construction waste will occur or construction waste not relevant	Construction waste decreased slightly	Construction waste decreased	Construction waste decreased significantly	0		This aspect would be considered through DM policy. Not possible to score at strategy level.
	...reduce water consumption rates?	Significantly worsens existing consumption rates	Worsens existing consumption rates	Maintains status quo	e.g. impact upon consumption unclear	No impact on water consumption	Consumption rates reduced to national average	Consumption rates reduced to Building Regulations requirement of 125 lpppd	Consumption rates reduced to optional standard of 110 lpppd	0		This aspect would be considered through DM policy. Not possible to score at strategy level. It is recommended that the government's higher optional technical standard is implemented,
	...manage impacts from flooding?	Significantly worsens impacts identified from SFRA	Worsens impacts identified from SFRA	Maintains status quo	e.g. impacts are unknown	No change to flood impacts	Improves impacts from flooding	Significantly improves impacts from flooding	Eliminates impacts from flooding	0		Developing such a large quantity of greenfield land could worsen impacts but difficult to score without exact detail of locations.
	...exacerbate flood risk on or off site?	Flood zone 3b and exception test fail	Flood zone 3a and exception test fail	Flood zone 2 and exception test fail	e.g. risk is unknown without further detail	No impact on flood risk	Flood zone 3 but exception test pass and improvements proposed e.g. SUDs	Flood zone 2 but exception test pass and improvements proposed e.g. SUDs	Flood zone 1	High Legislatively driven.		Majority of development locations would be acceptable. However, some locations around Paddock Wood are in flood zones 3a and 3b and would fail the exception test.
	...support improvements in groundwater quality?	High risk of contamination to groundwater e.g. source protection Zone 1 and previously contaminated land	Medium risk of contamination to groundwater e.g. source protection Zone 2 and possible previously contaminated land	Some risk of contamination to groundwater e.g. in source protection Zone 3 and unknown existing land contamination	e.g. risk is unknown without further investigation	No impact upon groundwater quality	Some support for improvements in groundwater quality	Support for improvements in groundwater quality	Significant support for improvements in groundwater quality e.g. prevention of intensive agriculture in source protection zone 1	0		Difficult to score without exact detail of locations. However, it is assumed that there would be no development that would create contamination risk to a SPZ.
	...relieve ecological pressures in water bodies from agriculture, water industry and rural land management activities?	Pressures increased significantly	Pressures increased	Pressures increased slightly	e.g. agricultural pressures reduced but water industry pressures increased	No impact upon pressures on water bodies	Pressures reduced slightly	Pressures reduced	Pressures reduced significantly	0		Building a significant amount of residential housing in the borough is unlikely to create additional pressure from the practises that cause most damage (agriculture, water industry and rural land management). Industrial development would require more stringent controls. This is a location specific aspect to be considered through DM policy.