Tunbridge Wells Borough Council

Sustainability Appraisal of the Submission Local Plan

Post Examination Addendum

Part 2 – Main Modifications

March 2025

Document History

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

Sustainability Appraisal Scoping Report (Stage A)

Date	Title	Content
June 2016	Sustainability Appraisal Scoping Report Consultation Draft	Issue for stand-alone consultation
October 2016	Sustainability Appraisal Scoping Report Final Report	Updated following consultation with statutory bodies and other interested parties, and consideration of new studies

Sustainability Appraisal (Stage B/C)

Date	Title	Content
May 2017	Sustainability Appraisal Assessment Report Issues and Options Stage Consultation Draft	Issue for consultation alongside Local Plan Issues and Options Report
Dec 2017 and May 2019	Sustainability Appraisal Assessment Report Issues and Options Stage Final Report	Updated following consultation with statutory bodies and other interested parties, and consideration of new studies. Latest update includes minor changes.
July 2019	Sustainability Appraisal of the Draft Local Plan Consultation Draft	Issue for consultation alongside Reg 18 Draft Local Plan Report

Date	Title	Content
Feb 2021	Sustainability Appraisal of the Reg 19 Pre-Submission Local Plan Consultation Draft	Issue for consultation alongside the Reg 19 Pre-Submission Local Plan

Sustainability Appraisal (Stage C/D)

Date	Title	Content
Oct 2021	Sustainability Appraisal of the Submission Local Plan Submission Draft.	Issue for submission alongside the Submission Local Plan
Mar 2022	Sustainability Appraisal of the Submission Local Plan Submission Draft.	Reissued to correct two minor errors on Table 12 identified during the Examination process.
Sept 2023	Sustainability Appraisal of the Submission Local Plan Post Examination Addendum Part 1 – Strategic Sites	Addendum to address additional work required on strategic site policies.
Jan 2025	Sustainability Appraisal of the Submission Local Plan Post Examination Addendum Part 2 – Main Modifications This report.	Addendum to address Main Modifications raised at Examination.

1 Introduction

1.1 Local Plan overview

1.1.1 The new Local Plan prepared by Tunbridge Wells Borough Council (TWBC) sets out the policies and plans to guide the future development of the borough in the period 2020 - 2038. It identifies the scale of development and also the key locations that will be used to meet this need including:

- 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
- further strategic policies to guide both place shaping and development management polices
- Place Shaping Policies, including both parish/settlement strategies, site-specific allocations and policies for development of identified sites including urban extensions
- Development Management policies to shape the form of development at application stage both for sites allocated in the Local Plan and other sites that come forward during the plan period

1.1.2 After consultation and review, the Local Plan was submitted for Examination in October 2021 and examination hearings were undertaken in 2022 in two stages. Stage 1 addressed matters of legal compliance including the Duty to Cooperate, the Sustainability Appraisal and Habitats Regulations, and Stage 2 considered issues relating to soundness.

1.1.3 Following examination, the Inspector issued a letter in November 2022, confirming the additional work the Council would need to undertake on the strategic sites in order to make the plan sound and adoptable.

1.1.4 In Sept 2023, a Part 1 Addendum report identified the implications of this additional work on the Sustainability Appraisal that accompanied the Submission Local Plan, particularly on the Plan's overall development strategy.

1.1.5 This Part 2 Addendum report identifies the implications of the remaining Local Plan modifications. Only main modifications have been considered in this report. Additional modifications were not considered likely to cause significant effects thus were not worthy of consideration by a Sustainability Appraisal.

1.2 Sustainability Appraisal Background

1.2.1 A Sustainability Appraisal (SA) is required during the preparation of a Local Plan by the Planning and Compulsory Purchase Act 2004 to ensure compliance with the requirements of the Strategic Environmental Assessment Directive. Its purpose is to help the Local Authority assess how effectively the Local Plan contributes to sustainable development.

1.2.2 There are five key stages in the preparation of a Sustainability Appraisal that are carried out alongside the preparation of a Local Plan (see Figure 1).

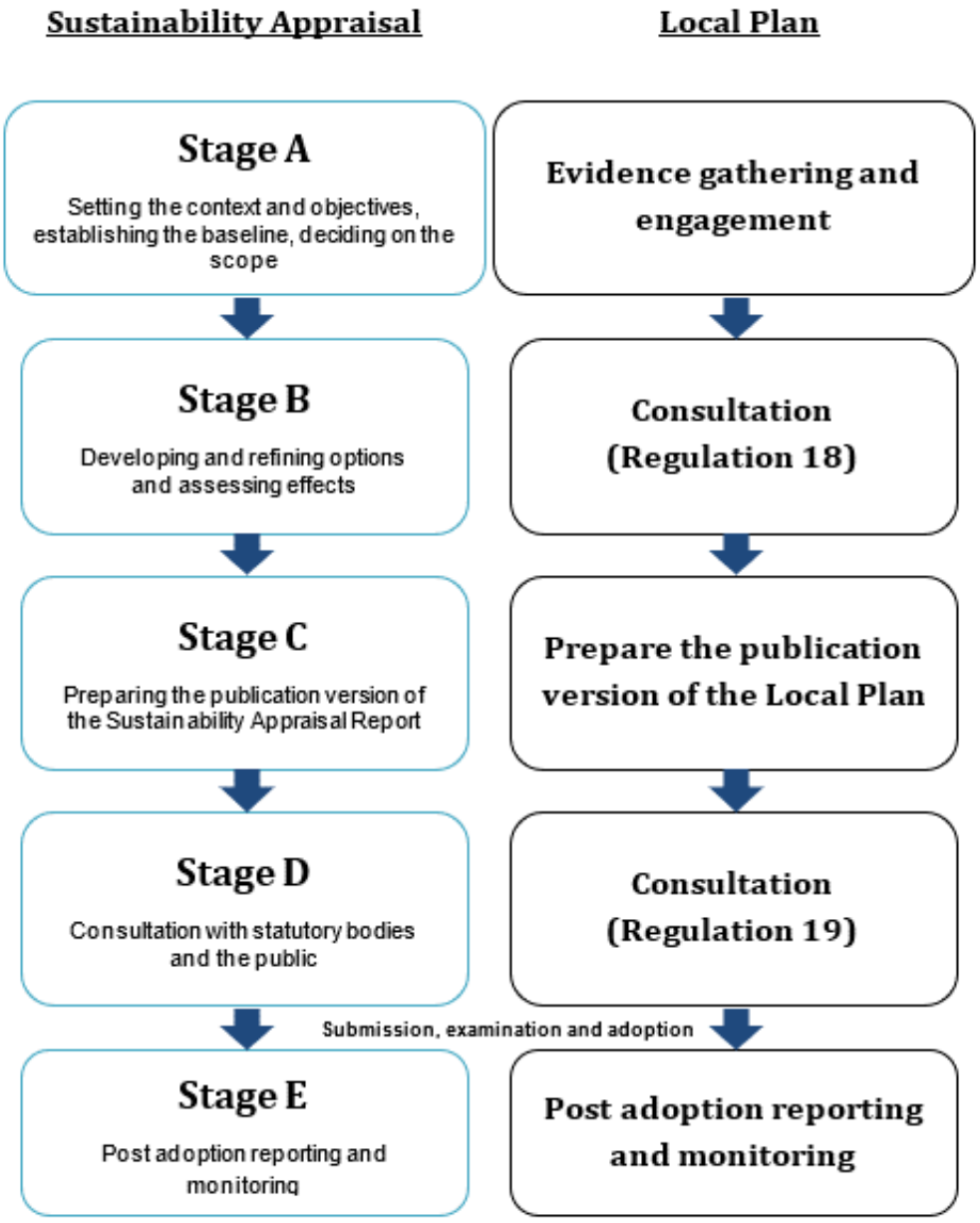

Figure 1. Key stages of Local Plan preparation and the relationship with the SA process. (Adapted from Planning Practice Guidance Reference ID: 11-013-20140306.)

1.2.3 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 consider consultees' comments, and a final version prepared in October 2016. The Stage A Scoping Report should be referred to for a description of the original baseline, relevant plans, policies and programmes and the justification for the sustainability objectives that are being implemented in this report. Updates to these descriptions are also provided in Chapter 3 of this report.

1.2.4 The Stage B of the sustainability appraisal process began in 2017 and was summarised initially with the production of the Issues and Options Stage Sustainability Appraisal.

1.2.5 As options were continually developed and refined, a SA report to accompany both the Draft and Pre-Submission Local Plans at Regulation 19 Stage were prepared in July 2019 and Feb 2021 respectively. Views from statutory consultees and other interested parties were sought throughout the Sustainability Appraisal process.

1.2.6 Finally, the SA was updated one last time in Oct 2021 as the Local Plan was prepared for submission for examination - a report which represented the end of Stage D.

2 Legal Compliance

2.1 The SEA Directive

2.1.1 The Sustainability Appraisal process associated with the production of the new Local Plan incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the "Strategic Environmental Assessment Regulations"), which implement the requirements of the European Directive 2001/42/EC (the "Strategic Environmental Assessment Directive") on the assessment of the effects of certain plans and programmes on the environment. The Planning and Compulsory Purchase Act 2004 requires that a SA is used to implement the legal requirements of the SEA regulations (whilst also considering economic and social impacts).

2.1.2 It is noted that the UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). This established a transition period for retaining the body of existing EU-derived law within our domestic law, including the SEA Regulations. The Retained EU Law (Revocation and Reform) Act, which sets out a deadline for the transition period of 31st December 2023 became law on 29th June 2023. After this date, EU-derived law that had not been revoked, amended or replaced was assimilated into the UK Statute book.

2.2 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010

2.2.1 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010, collectively referred to in this report as the Habitats Regulations, implements the Habitats Directive in England & Wales. Under the Habitats Regulations any plan or project likely to have a significant adverse effect upon the integrity of a 'European site' must be subject to an appropriate assessment to determine the implications for the designated site in view of its conservation objectives. 'European sites' are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within a European context. They consist of Special Areas of Conservation (SAC) designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora and Special Protection Areas (SPA) designated under Council Directive 2009/147/EC on the Conservation of Wild Birds.

2.2.2 Under the Habitats Regulations the Council, as the competent body, must determine if the Local Plan is likely to have a significant effect on the biodiversity of a European site, either alone or in combination with other plans or projects. If significant effects are predicted, then an appropriate assessment of the implications for the site in view of its conservation objectives must be undertaken.

2.2.3 As explained in paragraph 2.1.2, the UK left the EU on 31st January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act

2020 (“the Withdrawal Act”) which retains EU law. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for Habitats Regulations Assessments (HRA) will continue after the end of the Transition Period.

2.2.4 The main SA report sets out the findings of the HRA process in detail. In summary, an Appropriate Assessment, has been undertaken which looks at the potential effects of the policies contained in the Local Plan on the nearest European site – the Ashdown Forest. In this regard, all of the allocations and policies in the Local Plan were assessed for potential conflicts with this European site.

2.2.5 The HRA identified two potential linking pathways that could result in adverse effects upon the Ashdown Forest SAC and SPA that could act in combination with other projects and plans: recreational pressure and traffic-related air quality. However, the projected development outlined in the Local Plan (either alone or in combination with other plans) is expected to result in a negligible impact on both of these sources of impact. The main modifications proposed following Examination have not changed this conclusion.

3 Methodology

3.1 Updates to Baseline Data

3.1.1 The Sustainability Appraisal is a dynamic process that is continuously adapted or updated as more data or evidence becomes available.

3.1.2 As part of the scoping exercise, a baseline review of the environmental, social and economic issues relevant to Tunbridge Wells borough was undertaken and a further update was undertaken in 2021.

3.1.3 Table 1 below provides a list of additional relevant evidence studies that became available for consideration following publication of the Sustainability Appraisal for the submission Local Plan in Oct 2021. The implication of these studies for the baseline data underlying the Sustainability Appraisal is considered.

Table 1. New evidence studies and implications for the SA.

Evidence	**Source**	**Completion Date**	**Overview**	**Implication for the SA**
Ashdown Forest Practise Note	External consultant commissioned by TWBC	Feb 2022	Updated note to include expectation for SANG and SAMMS contributions.	SA method or baseline data does not need updating. There are no allocated sites within the 7km protection zone so scores cannot be improved.
Sensitivity Test Model and Technical Note (Addendum to Transport Assessment)	External consultant commissioned by TWBC	March 2022	Report finds that the modelling carried out at Reg 19 stage (March 2021) remains valid and robust.	The SA method or baseline data does not need updating.
Green Belt Stage 3 Addendum Report and assessment of the Colts Hill Bypass, and Zone of Theoretical	External Consultants commissioned by TWBC	May, Sept and Oct 2023	Further assessment of impacts of reasonable alternative sites, also taking account of potential mitigations.	Considered with Part 1 Report.

Evidence	Source	Completion Date	Overview	Implication for the SA
Visibility (ZTV) Colts Hill Bypass				
Tudeley Village - Red, Amber Green (RAG) Assessment	External Consultant commissioned by TWBC	May 2023	Report that advises on the likelihood of the Inspector's concerns about Tudeley Village being capable of being resolved and the time (and cost) for additional work.	Considered with Part 1 Report.
EiP Options - Transport Modelling and Flood Risk Modelling	External Consultant commissioned by TWBC	August - October 2023	To model the transport implications of the options outlined by the Inspector, also taking account of further work on growth options, as well as updated forecasting.	Considered with Part 1 Report.
Paddock Wood Master-planning Addendum report	External Consultant commissioned by TWBC	October 2023	To re-evaluate Option 3 of earlier work, also taking account of potential removal of new garden village and further flood modelling and sustainable transport evidence.	Considered with Part 1 Report.

Evidence	Source	Completion Date	Overview	Implication for the SA
Development Strategy Topic Paper	TWBC	October 2023	Updated following Inspector's concern that Tudeley Village does not meet the 'exceptional circumstances' green belt test.	Considered with Part 1 Report.
A26 AQMA revoked	Defra Air	October 2024	Nitrogen dioxide annual mean no longer exceeds legal thresholds in this location and thus AQMA designation has been revoked.	SA scores for the Air Quality objective within this locality need to be reconsidered.

3.2 Updates to Plans, Policies and Programmes

3.2.1 The tables below provide a list of key national, regional and local plans, policies and programmes that became available for consideration since publication of the Scoping Report in 2016, or an update to a previously identified plan. There have been no changes to international plans, policies and programmes in this time frame.

Table 2. Additional key national plans, policies and programmes

Title	Date	Purpose	Implication for SA
NPPF	Dec 2024	Various changes including definition of Grey Belt land.	Unlikely to have significant implications as the Local Plan has been examined against previous versions of the NPPF.

Title	Date	Purpose	Implication for SA
Written Ministerial Statement Planning - Local Energy Efficiency Standards Update	Dec 2023	Advises Local Plans should not include energy standard that go beyond national expectations.	New expectation has implications for the climate change ambition of the Local Plan and has direct impact upon policy EN3 which must now be edited. However, Planning and Energy Act is still deemed to be weighted highly.
Levelling Up and Regeneration Act	Royal Assent Oct 2023	Act is wide-ranging and includes an aim to speed up consents, give heritage assets more protection, neighbourhood plans more weight and introduce Environmental Outcome Reports.	Potential for significant impact upon the SA approach and methodology.
Building Regulations Part L	June 2022	Introduces more stringent energy reduction standards.	New expectation has implications for the climate change ambition of the Local Plan and has direct impact upon policy EN3 which must now be edited.

Title	Date	Purpose	Implication for SA
The Environment Act	Royal Assent Nov 2021	New Act to manage the impact on human activity on the environment, creating a more sustainable and resilient economy and enhancing well-being and quality of life. Key aspects include air quality, water, waste and resources and biodiversity including the concept of net gain.	This Bill has been considered by the SA process as it progressed towards gaining Royal Assent. The new legal requirement for BNG has the most significant implication for the SA.

Table 3. Updates to key local plans, policies and programmes

Title	Date	Purpose	Implication for SA
Neighbourhood Development Plans	At various stages throughout borough. There are currently 10 made Neighbourhood plans in the borough.	Contain various policies offering landscape protection and guidance on development design, community infrastructure and travel.	No update needed. All made NDPs have been screened for SEA and HRA and found not to have likely significant effects (except Benenden which has allocations that mirror the Local Plan).

3.3 Sustainability Objectives and Scoring Method

3.3.1 At scoping stage, 19 sustainability objectives were identified. These are summarised in Table 4.

Table 4. Sustainability Objectives for Tunbridge Wells Borough

Num.	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

Num.	Topic	Objective
5	Deprivation	Reduce poverty and assist with regeneration
6	Education	Improve educational attainment and enhance the skills base
7	Employment	Facilitate and support employment opportunities
8	Equality	Increase social mobility and inclusion
9	Health	Improve health and wellbeing, and reduce health inequalities
10	Heritage	Protect and enhance cultural heritage assets
11	Housing	Provide sufficient housing to meet identified needs
12	Land use	Protect soils, and reuse previously developed land and buildings
13	Landscape	Protect and enhance landscape and townscape
14	Noise	Reduce noise pollution
15	Resources	Reduce the impact of resource consumption
16	Services & Facilities	Improve access and range of key services and facilities
17	Travel	Improve travel choice and reduce the need to travel by private vehicle
18	Waste	Reduce waste generation and disposal
19	Water	Manage flood risk and conserve, protect and enhance water resources

3.3.2 Main modifications proposed to both the supporting text and the main policy were considered.

3.3.3 As for the original SA process, to provide an indication of how well the main modification for policy, strategy or site contributes to each of sustainability objectives, the original score determined from an eight-point scale of impact as shown in Figure 2 was considered and amended where necessary.

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

Figure 2. Eight-point scale of impact used to determine Sustainability Appraisal scores.

3.3.4 Where the main modifications created multiple changes to individual sustainability objectives, the process for determining an overall score followed was the same way as that for when scores across the various decision-aiding questions varied. Namely:

- An equal number and magnitude of positive, negative and neutral changes did not change the original score

- Where the majority of changes were positive, negative or neutral, the overall original score was adjusted in a positive, negative or neutral score direction overall
- A large number of unknown or mixed changes would be scored as unknown/mixed score overall.

3.3.5 A detailed explanation of the scoring method is provided in the submission version of the SA report (2021).

4 Screening of the Main Modifications

4.1.1 To determine which of the main modifications would be likely to have significant effects on the environmental, social and economic elements considered by the SA and/or have potential to alter the SA scores, a screening exercise was undertaken.

4.1.2 This process is summarised in the sections below for the strategic policies, site allocation policies and the development management policies.

4.2 Strategic Policies

4.2.1 Main modifications to the Development Strategy STR 1 are described in SA Addendum report Part 1 – Strategic Sites.

4.3 Site Allocation (Place Shaping) Policies

4.3.1 Within Table 5 to Table 17 below, a summary is provided of the screening stage for the Main Modifications relating to the Site Allocation or Place Shaping policies.

4.3.2 No Main Modifications have been proposed to the policies for Bidborough and Frittenden parishes.

Table 5. Implication for SA of Main Modifications (MM) for the Royal Tunbridge Wells (RTW) site allocation policy section of the Local Plan.

Policy	**MM Description**	**Implication for the SA**
AL/RTW 1	Clarification over use and increased housing numbers. Policy reference	Potential to be significant.
AL/RTW 2	None	n/a
AL/RTW 3	Policy reference	None
AL/RTW 4	Policy reference	None
AL/RTW 5	Minor text amendment to allow for safe access.	Not significant.
AL/RTW 6	Policy references	None
AL/RTW 7	None	n/a
AL/RTW 8	Minor text amendment.	Not significant.
AL/RTW 9	Additional policy text to encourage active/ sustainable travel.	Potential to be significant.
AL/RTW 10	Policy reference	None
AL/RTW 11	None	n/a
AL/RTW 12	Policy reference	None
AL/RTW 13	Minor text amendment	Not significant.
AL/RTW 14	Amendments in relation to access and policy addition. Policy reference.	Not significant.

Policy	MM Description	Implication for the SA
AL/RTW 15	Reduced housing numbers following advice from the Housing Association on the nature of needs and capacity. Amendment to introduce a flexible approach to the hub. Minor amendment in relation to phasing and policy references.	Potential to be significant.
AL/RTW 16	Clarification about MGB and long-term use and maintenance. Reference to specific landscape evidence reports. Change to supporting text about employment use. Policy references.	Not significant. SA assumed landscape evidence would be utilised.
AL/RTW 17	Clarification on employment use criteria.	Not significant.
AL/RTW 18	Clarification on type of leisure use. Policy reference.	Not significant.
AL/RTW 19	Further explanation about playing pitches, traffic and access. Encouragement of active sustainable travel. Minor clarification in regard to landscape and site constraints.	Potential to be significant.
AL/RTW 20	Policy reference	Not significant.
AL/RTW 21	Policy reference	Not significant.
AL/RTW 22	Policy reference and further detail on pedestrian access.	Not significant.

4.3.3 As can be seen in Table 5, the majority of Main Modifications for the Royal Tunbridge Wells allocation policies (15 out of 19) were found unlikely to alter the existing SA scores.

4.3.4 In Appendix E of the main SA report, page 196 contains a note that the unallocated site 30 (Land at Colebrook House) will be released from the Green Belt at the next Local plan review. The Inspector's letter from November 2022 confirms that this site is now not to be released from the Green Belt. Given that the SA only assessed allocated sites for cumulative impacts upon the Green Belt and Policy STR 9, this decision by the Inspector does not change the commentary or findings in Appendix E.

Table 6. Implication for SA of Main Modifications (MM) for the Southborough site allocation policy section of the Local Plan.

Policy	MM Description	Implication for the SA
AL/SO 1	Policy deleted as site has been built out.	Potential to be significant.
AL/SO 2	Amended to be less specific uses and to highlight the need to meet the MGB tests.	Potential to be significant.
AL/SO 3	Policy reference.	Not significant.

4.3.5 As can be seen in Table 6, main modifications were proposed for all three of the Southborough policies. Two of these were felt likely to alter the existing SA scores.

Table 7. Implication for SA of Main Modifications (MM) for the Cranbrook and Sissinghurst site allocation policy section of the Local Plan.

Policy	**MM Description**	**Implication for the SA**
AL/CRS 1	None	n/a
AL/CRS 2	None	n/a
AL/CRS 3	More effective wording for hedgerow reinstatement.	Not significant.
AL/CRS 4	More effective wording re applicability of more substantive proposals.	Not significant.
AL/CRS 5	None	n/a
AL/CRS 6	Clarification and amendments due to demonstrated viability issues and priority given to village hall replacement (over Affordable Housing).	Potential to be significant.
AL/CRS 7	None	n/a

4.3.6 As can be seen in Table 7, main modifications were proposed for three policies Cranbrook and Sissinghurst allocation policies. One of these was felt likely to alter the existing SA scores.

Table 8. Implication for SA of Main Modifications (MM) for the Hawkhurst site allocation policy section of the Local Plan.

Policy	**MM Description**	**Implication for the SA**
AL/HA 1	Policy deleted as site has been built out.	Potential to be significant.
AL/HA 2	Policy reference	Not significant.
AL/HA 3	Policy reference	Not significant.
AL/HA 4	Further clarity in wording regarding pedestrian access and landscape impacts. Removal of air quality expectations.	Not significant.
AL/HA 5	Delivery of medical centre alone is not viable. Officers have found that it can only be delivered alongside housing and that Land north of Birchfield is the only suitable location. Policy has been rewritten.	Potential to be significant.
AL/HA 6	None	n/a
AL/HA 7	Deletion of unnecessary text that is considered elsewhere in the plan.	Not significant.
AL/HA 8	Policy deleted.	n/a

4.3.7 As can be seen in Table 8 the majority of Main Modifications for the Hawkhurst allocation policies (4 out of 6) were found unlikely to alter the existing SA scores.

Table 9. Implication for SA of Main Modifications (MM) for the Benenden site allocation policy section of the Local Plan.

Policy	MM Description	Implication for the SA
AL/BE 1 AL/BE 2 AL/BE 3 AL/BE 4	Amendments to remove policies now the NDP has been made. Parish policy STR/BE reworded to reflect this change.	Not significant.

4.3.8 As detailed in Table 9, the removal of the Benenden allocation policies does not have a significant implication for the SA. However, the allocations should continue to be included in the table of cumulative impacts in Table 58 of the main SA report.

Table 10. Implication for SA of Main Modifications (MM) for the Brenchley and Matfield site allocation policy section of the Local Plan.

Policy	MM Description	Implication for the SA
AL/BM 1	Policy deleted as site has been built out.	Potential to be significant.
AL/BM 2	Minor changes to text relating to clarify children's play space, landscape protection and parking.	Not significant.

4.3.9 As detailed in Table 10, main modifications for one of the Brenchley and Matfield policies was found to have potential to affect the SA scores.

Table 11. Implication for SA of Main Modifications (MM) for the Goudhurst site allocation policy section of the Local Plan.

Policy	MM Description	Implication for the SA
AL/GO 1	Policy reference	Not significant.

4.3.10 As detailed in Table 11, the main modification proposed for the Goudhurst policy is not expected to affect the SA scores.

Table 12. Implication for SA of Main Modifications (MM) for the Horsmonden site allocation policy section of the Local Plan.

Policy	MM Description	Implication for the SA
AL/HO 1	Policy deleted as site has been built out.	Potential to be significant.
AL/HO 2	Further detail about the village hall, pedestrian link and heritage assets, and a more precise figure for the number of dwellings.	Not significant. Updated dwelling numbers is within range previously considered by SA.
AL/HO 3	Clarity over affordable housing provision, landscape, heritage and new medical centre.	Not significant.

4.3.11 As detailed in Table 12, of the three main modifications proposed for the Horsmonden, two are expected to have potential to affect the SA scores.

Table 13. Implication for SA of Main Modifications (MM) for the Lamberhurst site allocation policy section of the Local Plan.

Policy	MM Description	Implication for the SA
AL/LA 1	More detail regarding expectations for pedestrian links.	Not significant.

4.3.12 As detailed in Table 13, the main modification proposed for the Lamberhurst policy is not expected to have potential to affect the SA scores.

Table 14. Implication for SA of Main Modifications (MM) for the Pembury site allocation policy section of the Local Plan.

Policy	MM Description	Implication for the SA
AL/PE 1	More detail on landscape, stronger requirement for a cycle route, treatment of hedgerows, parking and sustainable travel.	Sustainable travel has the potential to be significant.
AL/PE 2	More detail on landscape, stronger requirement for a cycle route, cemetery management.	Sustainable travel has the potential to be significant.
AL/PE 3	More detail on landscape, stronger requirement for a cycle route and sustainable travel.	Sustainable travel has the potential to be significant.
AL/PE 4	Policy has been split into two allocations: one for residential	SA scores have been reassessed for two separate allocations.

	use and one for hospice use.	
AL/PE 5	Policy deleted as site has been built out.	Potential to be significant.
AL/PE 6	Requirement for active and sustainable travel. More detail on landscape issues.	Sustainable travel has the potential to be significant.
AL/PE 7	Requirement for active and sustainable travel. More detail on landscape issues.	Sustainable travel has the potential to be significant.
AL/PE 8	Update on application status. Requirement for active and sustainable travel.	Sustainable travel has the potential to be significant.

4.3.13 As detailed in Table 14, of the 8 main modifications proposed for the Pembury policies, all are expected to have potential to affect the SA scores.

Table 15. Implication for SA of Main Modifications (MM) for the Rusthall site allocation policy section of the Local Plan.

Policy	**MM Description**	**Implication for the SA**
AL/RU 1	Alteration of requirement to conserve or rather than to conserve and enhance heritage assets.	Potential to be significant.

4.3.14 As detailed in Table 15, the main modification proposed for the Rusthall policy is expected to have potential to affect the SA scores.

Table 16. Implication for SA of Main Modifications (MM) for the Sandhurst site allocation policy section of the Local Plan.

Policy	**MM Description**	**Implication for the SA**
AL/SA 1	Clarity on site location in AONB and pedestrian links.	Pedestrian links in Sandhurst already deemed adequate. Not significant.
AL/SA 2	Clarity on site location in AONB, heritage protection and pedestrian links.	No significant.

4.3.15 As detailed in Table 16, one of the main modification proposed for the Sandhurst polices is expected to have potential to affect the SA scores.

Table 17. Implication for SA of Main Modifications (MM) for the Speldhurst site allocation policy section of the Local Plan.

Policy	MM Description	Implication for the SA
AL/SP 1	More detail on transport, landscape, heritage and reference to other DM policies.	Not significant.
AL/SP 2	More detail on landscape.	Not significant.

4.3.16 As detailed in Table 17, the main modification proposed for the Speldhurst policies are not expected to have potential to affect the SA scores.

4.4 Development Management Policies

4.4.1 Within Table 18 to Table 21 below, a summary is provided of the screening stage for Main Modifications relating to the development management policies.

Table 18. Implication for SA of Main Modifications (MM) for the Environment DM policies in the Local Plan.

Policy	MM Description	Implication for the SA
EN 1	Deletion of unjustified text relating to behaviour change, supporting statements and preferential treatment for early engagement.	Not significant.
EN 2	Minor wording amendment.	Not significant.
EN 3	Amendment of policy requirements in relations to new Part L.	Potential to be significant.
EN 4	Combine with EN5	Not significant.
EN 5	Combine with EN4	Not significant.
EN 6	Minor wording amendment	n/a
EN 7	Minor amendment to supporting text.	Not significant.
EN 8	Requirement to adhere to guidance and need to meet zero sky glow adjusted.	Not significant.
EN 9	Clarification of wording and removal of some SPD and funding references. Adjustment to supporting text.	Potential to be significant.
EN 10	Addition of geodiversity in supporting text.	Not significant.
EN 11	Addition of reference to website instead of practice note.	Not significant.

Policy	MM Description	Implication for the SA
EN 12	None	n/a
EN 13	Addition of requirement for evidence.	Not significant.
EN 14	Addition of clarity regarding ecological connectivity.	Not significant.
EN 15	Requirement for green space replacement reworded but no material difference in ambition.	Not significant.
EN 16	Minor wording amendment. Expectations unchanged.	Not significant.
EN 17	None	n/a
EN 18	Listing of rural lanes.	Not significant.
EN 19	More detailed requirements for LVIA in supporting text.	Potential to be significant.
EN 20	Policy reworded to describe expected assessment outcomes.	Not significant.
EN 21	Addition of PRoW network.	Not significant.
EN 22	Clarification to supporting text so in line with existing policy and current status of AQMAs in the borough.	Not significant.
EN 23	Improvement to wording in policy for consistency.	Not significant.
EN 24	Updates to supporting texts with latest guidance.	Not significant.
EN 25	Updates to supporting texts with latest guidance.	Not significant.
EN 26	Updates to supporting texts with latest guidance.	Not significant.
EN 27	Improvement to wording to reflect status of SPD and approach to closed landfill.	Not significant.
EN 28	Update to supporting text to reflect status of SPD.	Not significant.

4.4.2 As can be seen in Table 18, the majority of Main Modifications for the Environment DM policies (22 out of 25) were found unlikely to alter the existing SA scores.

Table 19. Implication for SA of Main Modifications (MM) for the Housing DM policies in the Local Plan

Policy	MM Description	Implication for the SA
H 1	Minor adjustment to supporting text.	Not significant.
H 2	Reference to locations served by public transport.	Potential to be significant.

Policy	MM Description	Implication for the SA
H 3	Minor amendments re calculations, phasing plans and supporting text.	Not significant.
H 4	None	n/a
H 5	Adjustments to supporting text for effectiveness.	Not significant.
H 6	Greater emphasis on need for bungalows and greater clarity on accessible dwellings.	Potential to be significant.
H 7	None	n/a
H 8	Removed reference to council taking on plots.	Not significant.
H 9	Additional text and minor amendments to provide finer and more exact detail on sites and for improved clarity on expectations.	Not significant.
H 10	Minor adjustment to supporting text and policy for effectiveness and clarity.	Not significant.
H 11	Adjustment to remove size threshold and update to AONB wording.	Not significant.
H 12	None	n/a

4.4.3 As can be seen in Table 19, the majority of Main Modifications for the Housing DM policies (7 out of 9) were found unlikely to alter the existing SA scores.

Table 20. Implication for SA of Main Modifications (MM) for the Economic Development DM policies in the Local Plan

Policy	MM Description	Implication for the SA
ED 1	Change to text concerning use classes and removal of reference to North Farm area being intended for leisure/retail.	Potential to be significant.
ED 2	Clearer wording including more explicit reference to use classes and detailed requirements for viability reviews.	Not significant.
ED 3	Updates to technology expectations and trigger threshold.	Not significant.
ED 4	Minor update to supporting text.	Not significant.
ED 5	Removal of supporting text discouraging employment in isolated locations, removal of policy text discouraging conversions to residential, rewording of policy to include expectation for reuse of	Potential to be significant.

Policy	MM Description	Implication for the SA
	buildings, and consideration of permitted development.	
ED 6	Addition of leisure uses in line with NPPF.	Not significant.
ED 7	More concise wording and general support for tourism.	Not significant.
ED 8	Alterations to centres hierarchy.	Potential to be significant.
ED 9	Minor alterations to centres considered by policy.	Not significant.
ED 10	Minor alterations to wording including alteration to triggers for impact assessment	Not significant.
ED 11	None	n/a
ED 12	More detailed requirements in relation to net, commercial and unnecessary loss.	Not significant.

4.4.4 As can be seen in Table 20, the 3 out of 11 of the Main Modifications for the Economic Development DM policies were found to have potential to alter the existing SA scores.

Table 21. Implication for SA of Main Modifications (MM) for the Transport DM policies in the Local Plan

Policy	MM Description	Implication for the SA
TP 1	Additional requirements for Transport Assessments.	Not significant.
TP 2	Commitment to funding speed limit alterations and need to consider frequency of public transport services. Removal of requirement for public transport to be nearby.	Potential to be significant.
TP 3	Remove reference to SPD. Remove reference to adhering to KCC standards made less stringent.	Potential to be significant.
TP 4	None	n/a
TP 5	None	n/a
TP 6	None	n/a

4.4.5 As can be seen in Table 21, 2 out of 3 of Main Modifications for Transport and Parking DM policies were found to have potential to alter the existing SA scores.

Table 22. Open Space, Sport and Recreation.

Policy	MM Description	Implication for the SA
OSSR 1	Need to demonstrate one of the requirements steps instead of all the requirement steps.	Unlikely to be significant. All individual steps represent a robust control mechanism.
OSSR 2	None	n/a

4.4.6 As can be seen in Table 22 the Main Modification for Open Space Sport and Recreation were found to not have significant effect on the previous SA.

5 SA of the Main Modifications

5.1.1 Following screening stage, the main modifications to policies with potential to affect the SA scores were assessed in detail to determine the outcome of the new SA assessment.

5.1.2 These detailed assessments are presented below for each of the three policy types: Strategic (Section 5.2), Site Allocation (Section 5.3) and Development Management (Section 5.4).

5.2 Strategic Policies

5.2.1 The implications of Main Modifications proposed to Strategic Policies have been considered in SA Addendum report Part 1 – Strategic Sites.

5.3 Site Allocation (Place Shaping) Policies

5.3.1 The new SA assessments including adjusted scores (where applicable) for the site allocation policies are shown below in Table 23 – Table 31. Where appropriate, a summary of the changes made follows the table for each parish and includes a consideration of cumulative impacts.

Table 23. New SA assessments and scores for RTW. Table 1 of 2.

Sustainability Objective	AL/ RTW 1	AL/ RTW 9
Air	?	0 / -
Biodiversity	0	0
Business Growth	0 / +	0
Climate Change	-	0 / -
Deprivation	+	0
Education	0 / +	0
Employment	+ + +	+
Equality	+ / + +	+
Health	0 / +	+ +
Heritage	-	0
Housing	+ + / + + +	+
Land use	+	-
Landscape	0 / +	0 / -
Noise	-	0 / -
Resources	0 / ?	0 / ?
Services & Facilities	+ + +	+ +
Travel	+ / + +	+ / + +
Waste	0	0
Water	0 / -	0
Commentary	The change in housing numbers from 100 to 166, has potential to affect the Climate Change, Housing and Water objectives. However, it is noted that the increase in dwellings could be extra care units only and are located in a central location well served by public transport. To reflect these points, the Climate score has changed from 0/- to -, Housing changed from + + to + + / + + + and Water has been changed from 0 to 0/-. Air, Education and Travel objectives remain unchanged.	The additional policy text to encourage sustainable/active travel will benefit the Travel objective. This score has been changed from + to + / + +. Score for air remains unchanged reflecting the continued risk of siting sensitive receptors near busy traffic.

Table 24. New SA assessments and scores for RTW. Table 2 of 2.

Sustainability Objective	AL/RTW 15	AL/RTW 19
Air	?	0 / +
Biodiversity	0	0
Business Growth	0	0
Climate Change	0	0
Deprivation	+	0
Education	+ +	0
Employment	+ +	+
Equality	+ / + +	+
Health	0 / +	+
Heritage	0	0
Housing	+ / + +	0
Land use	+ / + +	0 / -
Landscape	0	-
Noise	-	0 / -
Resources	- - - / ?	0
Services & Facilities	+ + +	+ + +
Travel	+	+ / + +
Waste	0	0
Water	0 / +	0
Commentary	The change in housing numbers from 155 to a range of 35-40, has potential to affect the Climate Change, Education, Housing and Water objectives. To reflect this, Climate has changed from - to 0, Education has changed from + to + + housing changed from + + / + + + to + + / + + and Water has been changed from ? (mixed) to 0/+ reflecting location within FZ1. Travel objectives remain unchanged due to the central location but reduced opportunities for funding sustainable travel.	The additional policy text to encourage sustainable/active travel will benefit the Air and Travel objectives. The Air objective score has changed from 0 to 0 / + and the Travel score has been changed from + to + / + +.

5.3.2 Overall, scores for RTW were improved slightly by the main modifications.

5.3.3 An assessment of how the changes in scores influenced the cumulative impacts for the town was made for each objective.

5.3.4 For the Air objective, consideration was given to whether scores could be improved due to the revoked AQMA on the A26. However, this was not felt significant enough to warrant a change in the cumulative score for Air due to the large number of sites proposed for allocation and the majority of sites been assigned mixed scores for the Air objective.

5.3.5 For the Climate, Housing and Water objectives, no overall change in scores was seen, with one policy slightly improving each of these objectives and one policy slightly weakening each of these objectives.

5.3.6 For the Education objective, scores improved slightly with one policy slightly improving this objective. However, this was not felt significant enough to warrant a change in the cumulative score for Education due to the large number of sites proposed for allocation in the town, the majority of which were already scored slightly positive.

5.3.7 For the Travel objective, scores improved slightly with two policies slightly improving this objective. However, this was not felt significant enough to warrant a change in the cumulative score for Travel due to the large number of sites proposed for allocation in the town, the majority of which were already scored positive.

5.3.8 For these reasons, no changes were made to the scores for STR/RTW 1 and 2 i.e. the cumulative impacts for the town.

Table 2225. New SA assessment and scores for Southborough.

Sustainability Objective	AL/SO 2
Air	0 / -
Biodiversity	0 / +
Business Growth	+
Climate Change	? / -
Deprivation	0
Education	0
Employment	+ +
Equality	0
Health	+ +
Heritage	?
Housing	0
Land use	0
Landscape	-
Noise	0 / -
Resources	?
Services & Facilities	0 / +
Travel	+
Waste	0
Water	0
Commentary	This parcel was not assessed in the Green Belt study so the green belt scoring element was assessed as unknown, with the overall score for Land Use being influenced by loss of Greenfield land. However, more specific policy wording on satisfying MGB policy places greater emphasis on reuse of the existing building instead of new build improves the overall Land Use objective from 0 / - to 0.

5.3.9 The deletion of Policy AL/SO 1 results in 16 fewer dwellings being allocated to the Southborough area. However, the policy is deleted because the site has been built out and thus a change to scores for STR/SO 1 i.e. the cumulative impacts for the urban area, is not deemed necessary.

Table 26. New SA assessment and scores for Cranbrook and Sissinghurst.

Sustainability Objective	**AL/CRS 6**
Air	0
Biodiversity	0
Business Growth	0
Climate Change	0
Deprivation	0
Education	0 / -
Employment	+
Equality	+ / + +
Health	0 / +
Heritage	0
Housing	0 / +
Land use	- / - -
Landscape	- / - -
Noise	0
Resources	0 / ?
Services & Facilities	-
Travel	0
Waste	0
Water	0 / +
Commentary	A less onerous requirement for affordable housing could reduce the score for the Housing objective. However, this amendment means the policy still allocates only a relatively small proportion of dwellings for the village. Assuming that the delivery of zero affordable units is a possibility, the housing score would change from + to 0 / +.

5.3.10 In addition to the alteration to scores for AL/CRS 6 that is triggered by Main Modifications, the scores for Policy STR/CRS 1 (cumulative impacts) and policies relating to housing allocations must now be amended to reflect the closure of a non-selective secondary school in Cranbrook in 2022. Applicable policies are all downgraded slightly resulting in Policy STR/CRS 1 now scoring a neutral score for the Equality Objective.

Table 27 New SA assessment and scores for Hawkhurst.

Sustainability Objective	**AL/HA 5**
Air	-
Biodiversity	-
Business Growth	0
Climate Change	0
Deprivation	0
Education	+ +
Employment	+
Equality	0
Health	0
Heritage	0 / -
Housing	+ +
Land use	-
Landscape	- -
Noise	0
Resources	? / -
Services & Facilities	0
Travel	-
Waste	0
Water	0
Commentary	Land to the North of Birchfield Grove. Most scores have now changed to reflect the fact the medical centre allocation now includes 70 new dwellings, parking, landscaping and a new country park. New commentary: This site provides a reasonably significant quantity of new dwellings. The sensitive edge of settlement location with far reaching views is likely to cause impacts upon the character of the AONB and the wider historic environment (confirmed by the 2020 LVIA report). The relatively large number of dwellings may impact upon the recently declared AQMA. Scores for equality, air, travel and services reflect expectation that direct pedestrian route would be made onto Rye Road. The positive education score reflects the suitability of the site to safeguard land for expansion of the primary school.

Sustainability Objective	AL/HA 5

5.3.11 The deletion of Policy AL/HA 1 results in 43 fewer dwellings being allocated to the Hawkhurst area. However, the policy is deleted because the site has been built out and thus a change to scores for STR/HA 1 i.e. the cumulative impacts for the Hawkhurst area are not deemed significant.

5.3.12 In addition to the alteration to scores for AL/HA 1 that is triggered by Main Modifications, the scores for Policy STR/HA 1 (cumulative impacts) and policies relating to housing allocations must now be amended to reflect the closure of a non-selective secondary school in Cranbrook in 2022. Applicable policies are all downgraded slightly resulting in Policy STR/HA 1 now scoring a neutral score for the Equality Objective.

5.3.13 The deletion of Policy AL/BM 1 results in 45 fewer dwellings being allocated to the Brenchley and Matfield area. However, the policy is deleted because the site has been built out and thus a change to scores for STR/BM 1 i.e. the cumulative impacts for the Brenchley and Matfield area are not deemed significant.

5.3.14 The deletion of Policy AL/HO 1 results in 45-55 fewer dwellings being allocated to the Horsmonden area. However, the policy is deleted because the site has been built out and thus a change to scores for STR/HO 1 i.e. the cumulative impacts for the Horsmonden area are not deemed significant.

Table 28. New SA assessments and scores for Pembury. Table 1 of 3.

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

Commentary on Table 27	A stronger commitment to active and sustainable travel benefits the air, climate change and travel objectives. Travel score has been changed from 0 to 0 / +. Air scores remain as neutral as a positive score was not possible. Climate Change scores remain as ?/- score to reflect carbon footprint associated with construction and operation.

Table 29. New SA assessments and scores for Pembury. Table 2 of 3.

Sustainability Objective	AL/ PE 4 A	AL/ PE 4 B
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	? / -	?/-
Deprivation	0	0
Education	+	0
Employment	+	+
Equality	0 / +	0
Health	0 / +	0 / +
Heritage	-	-
Housing	0 / +	0
Land use	-	-
Landscape	-	-
Noise	0 / -	0 / -
Resources	0 / ?	0 / ?
Services & Facilities	0 / -	0 / -
Travel	0 / -	0 / -
Waste	0	0
Water	0 / -	0 / -
Commentary	A new SA scoring matrix for Land at Downingbury Farm (west), Maidstone Road allocated for residential development providing approximately 25 dwellings, of which 40 percent shall be affordable housing. A stronger commitment to active and sustainable travel benefits the air and travel objectives. Climate Change scores remain as ?/- score to reflect carbon footprint associated with construction and operation.	A new SA scoring matrix for Land at Downingbury Farm (east), Maidstone Road allocated for expansion of the Hospice in the Weald, now released from the Green Belt (was previously safeguarded land for hospice expansion). Green Belt release has affected the scoring for land use, with the new policy having a positive effect on employment and health, and slightly negative on land use and heritage.

Table 30. New SA assessments and scores for Pembury. Table 3 of 3.

Sustainability Objective	AL/ PE 6	AL/ PE 7	AL/ PE 8
Air	0	0	0 / -
Biodiversity	0 / -	0 / -	-
Business Growth	+	+	+
Climate Change	? / -	? / -	? / -
Deprivation	0	0	0
Education	+	+	0
Employment	+ / + +	+ / + +	+ / + +
Equality	+	+	+
Health	+ +	+ / + +	+ / + +
Heritage	0	0	0
Housing	0	0	0
Land use	0 / -	-	0 / -
Landscape	0 / -	0 / -	0 / -
Noise	-	-	-
Resources	- / ?	- - / ?	?
Services & Facilities	0 / -	0 / -	0 / -
Travel	0 / +	0 / +	0
Waste	0	0	0
Water	0	0	0 / -
Commentary on Table 29	A stronger commitment to active and sustainable travel benefits the air, climate change and travel objectives. Travel score has been changed from 0 to 0 / + except for PE8 which changes from 0 / - to 0. Air scores remain as neutral as a positive score was not possible. Travel scores remain as ? / - to continue to account for carbon emission from construction and operation of the new dwellings.		

5.3.15 The deletion of Policy AL/PE 5 results in 10 fewer dwellings being allocated to the Horsmonden area. However, the policy is deleted because the site has been built out and thus a change to scores for STR/PE 1 i.e. the cumulative impacts for the Horsmonden area are not deemed significant.

Table 31. New SA assessment and scores for Rusthall.

Sustainability Objective	**AL/RU 1**
Air	0
Biodiversity	-
Business Growth	0
Climate Change	0
Deprivation	0
Education	0 / +
Employment	0
Equality	+
Health	0
Heritage	0 / -
Housing	0 / +
Land use	0 / +
Landscape	0
Noise	- / - -
Resources	?
Services & Facilities	+ +
Travel	0
Waste	0
Water	0
Commentary	Amendment of the policy requirement to conserve or enhance heritage assets rather than simply to include enhancements of heritage assets has potential to reduce the Heritage objective score. However, the decision-aiding criteria for this objective is to "…provide a framework for a positive heritage strategy including enhancements **in line with NPPF**" (emphasis added). This policy amendment is for more accurate alignment with the NPPF and thus the SA is not impacted. No change to scores.

5.4 Development Management Policies

5.4.1 The new SA assessments and scores (where applicable) for the development management policies are shown below in Table 32 – Table 3Table 5.

5.4.2 All changes to scores undertaken were only very slight and only to a small proportion of objectives.

5.4.3 No alterations in scoring were significant enough to warrant a reconsideration of previously considered reasonable alternatives.

Table 32. New SA assessments and scores for the environment DM policies.

Sustainability Objective	EN3 – Climate Change	EN9 – Net Gains	EN 19 – National Landscape (AONB)
Air	0	0	0
Biodiversity	+	+ + +	+
Business Growth	+ +	0	0
Climate Change	+ +	+	0
Deprivation	+ +	0	0
Education	0	0	0
Employment	0	0	0
Equality	0	0	0
Health	+ +	+	0
Heritage	0	0	+ +
Housing	0	0	0
Land use	+	+	0
Landscape	+ +	+ +	+ + +
Noise	0	0	0
Resources	0	0	0
Services & Facilities	0	0	0
Travel	0	0	0
Waste	0	0	0
Water	+ +	+ +	+
Commentary	New MM policy requirement is less well aligned with national climate change objectives and expectations under the Planning and Energy Act. Climate Change score reduced from + + + to + +.	New MM policy requirement to include a specific reference to soil guidance will benefit the land use objective which has an objective to protect soils. Land Use score changed from 0 to +.	Amendment to supporting text represents a clearer approach which could better the landscape. However, the landscape score is already maximised so no further improvement can be recognised by the SA process. No change to scores.

Table 33. New SA assessments and scores for the Transport DM policies.

Sustainability Objective	TP2 - Design	TP 3 - Parking
Air	+ / + +	+ +
Biodiversity	0	0
Business Growth	+	+
Climate Change	+ / + +	+
Deprivation	0	0
Education	0	0
Employment	+	+
Equality	+ +	0
Health	+ +	+
Heritage	+ +	+
Housing	0	0
Land use	0	0
Landscape	+ + +	+ +
Noise	+ + / + + +	0
Resources	0	0
Services & Facilities	+ +	+
Travel	+ + +	+ + +
Waste	0	0
Water	0	0
Commentary	A commitment to funding improvements is assumed to result in slower traffic speeds. As a result, the Noise, Air and Climate objectives could benefit. The score for Air changed from + to + / + +, Noise changed from + + to + + / + + +, Climate changed from + to + / + +.	Removing commitment to adhere to KCC standards creates risk that active travel and public transport use may not be encouraged for non-residential development (TWBC does not have own standards). This could impact the air, travel climate objectives. However, local standards focus more on current needs rather than encouraging a shift away from private car use so may not be the most appropriate approach. For this reason, scores remain unchanged.

Table 34. New SA assessments and scores for the Housing DM policies.

Sustainability Objective	H 2 – Housing Density	H 6 – Older Persons (need)	H 6 – Older Persons (accessibility)
Air	0 / +	0	0
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0 / +	0	0
Deprivation	0	+	+
Education	0	0	0
Employment	0	0	0
Equality	+	+ +	+ + +
Health	0	+	+
Heritage	0	0	0
Housing	+ + +	+ + +	+ + +
Land use	+	0	0
Landscape	+ + +	+ + +	0
Noise	0	+	0
Resources	0	+	0
Services & Facilities	+ +	+ +	0
Travel	+ + / + + +	+	0
Waste	0	0	0
Water	0	0	0
Commentary	Specific reference to public transport added to policy. This better aligns with the Travel, Climate and Air objectives. Travel score changed from + + to + + / + + +, Air score changed from 0 to 0 / + and Climate score changed from 0 to 0 / +.	A policy that is more responsive to circumstances and places greater emphasis on need for bungalows would benefit the housing objective. However, the housing score is already maximised so no further improvement can be recognised by the SA process. No change to scores.	The additional text recognising that accessible dwellings are not required in all situations reflects the PPG and is unlikely to affect the housing objective. Existing demand is expected to be adequately met even with the policy amendment. No change to scores.

Table 35. New SA assessments and scores for the Economic Development DM policies.

Sustainability Objective	ED 1 - KEAs	ED 5 – Rural Dwellings	ED 8 - Hierarchy
Air	+	0	+
Biodiversity	0	+	0
Business Growth	+ + +	+ + +	+ + +
Climate Change	+	0	0
Deprivation	0	0	0
Education	0	0	0
Employment	+ + +	+ +	+ +
Equality	0	0	0
Health	0	+	0
Heritage	0	+	0
Housing	0	0	0
Land use	+	+ + +	0
Landscape	0	+ + +	0
Noise	0	0	0
Resources	+	+ + / + + +	+ + +
Services & Facilities	+ + +	+	+ +
Travel	+ +	0	0
Waste	0	+	0
Water	0	+	0
Commentary	Preventing unrestricted retails and leisure uses in town centres (at the expense of services and facilities) would have a beneficial impact on the Services objective. However, score is already maximised so cannot be improved. It is assumed, an appropriate quanta of retail/leisure would still be achieved.	Not discouraging residential redevelopment in isolated locations with poor accessibility could negatively affect the Travel objective. However, conversions are not a significant form of development. Explicitly discouraging demolition would benefit the Resources objective. Resources score changed from + + to + + / + + +.	The removal of Tudeley village from the lists of Neighbourhood Centres and villages settlements is unlikely to impact upon the services score as the local parishes would be well served by new

Sustainability Objective	ED 1 - KEAs	ED 5 – Rural Dwellings	ED 8 - Hierarchy
			Neighbourhood Centres at Paddock Wood and East Capel. No change to scores.