
Preferred Options - Sustainability Appraisal

SUSTAINABILITY APPRAISAL

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
CORE STRATEGY SA REPORT				
1. OFFICIAL CONSULTEE				
103	Environment Agency	PO/103.18	The summary of the SA for preferred option CP14 states that 'the policy may contribute to the restriction of development on areas of land that are classified as being at low risk'. It should not be forgotten that 'low risk' in PPG25 is defined as Flood Zone 2, the preference for development should always start with Flood Zone 1 'little or no risk'.	Noted. The spatial strategy for the Borough of Tonbridge and Malling has been developed according to the principles of sustainable development, reflecting Government advice in PPGs and PPSs. A sequential approach to the identification of potential development areas was followed, as identified in PPG25, taking into account environmental, economic and social spatial objectives identified nationally, regionally and locally. The strategy was also informed by a number of baseline studies. It is important to appreciate that when proposing development land allocations the Borough Council has a duty to weigh the issue of flood risk against the need to deliver other environmental and economic and social benefits in the wider overall interest of the community of Tonbridge and Malling. Furthermore, the outcome of the sequential test demonstrates that virtually all (95%) of future development in the Borough - outside of Tonbridge urban area - can be achieved in flood zone 1. It is proposed to add a clause to the policy to address circumstances where development outside the confines of the urban area will be allowed.
103	Environment Agency	PO/103.17	Support mitigation proposal for preferred option CP5 of defining how the council will judge where development can and cannot occur.	Policy CP5 is proposed to be moved to policy CP26 'Mitigation of Development Impacts'. The supporting text to policy CP26 details how and when mitigation measures should be provided where existing natural resources are affected. Detailed policies on nature conservation will be set out in the Environmental Protection Policies DPD.
109	Countryside	PO/109.02	Would like to see indicators developed to monitor the	A set of performance indicators for the Core Strategy has been

SUSTAINABILITY APPRAISAL

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Agency		preservation and enhancement of all landscapes.	developed, in accordance with government advice.
109	Countryside Agency	PO/109.01	Endorse the development of indicators for the 'Provision and the Access to Open Spaces' and the 'Use of and Access to the Countryside'.	Noted.

DEVELOPMENT LAND ALLOCATIONS SA REPORT

1. OFFICIAL CONSULTEE

103	Environment Agency	PO/103.20	Seek clarification of how the outputs from the SA will be used.	The outputs of the SA of the preferred options will inform the involvement and development of policies in the submission version of the DPDs.
103	Environment Agency	PO/103.19	Welcome the outlining of uncertainties, where they have been found, within the Assessment.	Noted.

SA - GENERAL

1. OFFICIAL CONSULTEE

91	English Heritage	PO/091.17	Disappointed that the contribution of the historic environment to the character and distinctiveness of the Borough only secures a limited profile in the assessment process.	The issue of the historic environment is addressed in SA objective 14 which focuses on the need 'to protect, enhance and make accessible for enjoyment, the countryside and the historic environment'. Whilst the SA objectives are based on the objectives laid out in the South East Integrated Regional Framework, the range of issues set out in the SEA Directive and the headline objectives suggested in the Government guidance on Sustainability Appraisal, they were amended in the light of key sustainability issues identified during the context review and baseline data collection. This has ensured that they are not generic objectives but objectives that relate and respond to circumstances local and relevant to Tonbridge and Malling.
103	Environment Agency	PO/103.23	Consider that the Environmental Report can be understood by the intended audience.	Noted.

SUSTAINABILITY APPRAISAL

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
SEA DIRECTIVE REQUIREMENTS CHECKLIST				
1. OFFICIAL CONSULTEE				
103	Environment Agency	PO/103.16	The Sustainability Appraisal meets the list of requirements of the Strategic Environmental Assessment Directive.	Noted.
103	Environment Agency	PO/103.15	Considers that the Strategic Environmental Assessment process has been achieved in all three of the Reports.	Noted.
5. LAND OWNER				
107	H & H Celcon Limited	PO/107.20	Unclear how SEA Directives have been met.	Table 1 in section 1 of the Sustainability Appraisal (SA) of the Core Strategy clearly identifies how and at what stage the SEA Directive requirements have been addressed.

TONBRIDGE AAP SA REPORT

1. OFFICIAL CONSULTEE				
103	Environment Agency	PO/103.22	Support the choice of Option A for Objective 3 under the theme 'Town Centre Size and Extent of Activity' that allows some waterside areas to remain tranquil and identifies key locations where waterside activity to occur.	Noted.
103	Environment Agency	PO/103.21	On the theme of 'Townscape and the Role of Water' the preferred option B should acknowledge and promote the role of new public spaces in water resource management/water quality. Such spaces may actually provide opportunities for some positive enhancements that could aid sustainable drainage e.g. porous paving, or provide positive uses of spaces e.g. recycling roof water through to a water feature/fountain.	The Environment Agency and the Borough Council have jointly commissioned Mott MacDonald to carry out a Strategic Flood Risk Assessment (SFRA) for the Borough. Part of this exercise will involve developing flood risk management and mitigation measures for proposed development areas that fall within high risk flood risk zones. Furthermore, a Flood Risk Assessment (FRA) will be required in respect of any development within the flood plain. These FRA's will need to have regard to the advice in the SFRA and to the requirements of proposed policy CP1 in the draft submission version of the Core Strategy on 'Sustainable Development'. It is the intention of the Borough Council to consult

SUSTAINABILITY APPRAISAL

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				with the Environment Agency on development proposals within the flood plain, with the purpose of minimising and managing any flood risk in the detailed design of such developments. It is envisaged that this will be the appropriate stage to effectively address how development schemes, including new public spaces, can positively contribute to water resource management/water quality.