TONBRIDGE AND MALLING
BOROUGH COUNCIL

AFFORDABLE HOUSING
SUPPLEMENTARY PLANNING
DOCUMENT

Sustainability Appraisal Report

March 2008
# CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Summary</td>
<td>1</td>
</tr>
<tr>
<td>2. Background</td>
<td>3</td>
</tr>
<tr>
<td>3. Context and Baseline</td>
<td>5</td>
</tr>
<tr>
<td>4. Options Appraisal</td>
<td>10</td>
</tr>
<tr>
<td>5. Monitoring</td>
<td>24</td>
</tr>
</tbody>
</table>

## Annexes

<table>
<thead>
<tr>
<th>Annex</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annex 1</td>
<td>SEA Determination</td>
<td>25</td>
</tr>
<tr>
<td>Annex 2</td>
<td>Responses to SEA Screening</td>
<td>33</td>
</tr>
</tbody>
</table>
1 Summary

1.1 Non technical summary

1.1.1 The Affordable Housing Supplementary Planning Document (SPD) seeks to amplify affordable housing policies CP17 and CP19 within the Tonbridge and Malling Core Strategy and aims to help address identified shortfalls in provision in the Borough. The SPD contains detailed guidance to ensure a consistent approach to the delivery of new affordable housing through the planning system.

1.1.2 This Sustainability Appraisal Report presents the findings of the Sustainability Appraisal (SA) of the Tonbridge and Malling Affordable Housing SPD. It follows the process set out in Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, published by the Office of the Deputy Prime Minister (ODPM) in November 2005, as well as the local methodology and framework set out in the SA Report of the Tonbridge and Malling Core Strategy published in October 2005.

1.1.3 This report documents the baseline information and relevant plans, policies and programmes; assesses the anticipated effects of implementing the SPD and other options; proposes methods of mitigating adverse impacts and maximising beneficial impacts as well as presenting proposals for monitoring the impact of the SPD.

1.1.4 The report is structured as follows:

- Section 2 – background information, links to the Core Strategy SA process and the requirements of the SA and Strategic Environmental Assessment (SEA) processes;
- Section 3 – context and baseline information including the review of key plans, policies and programmes, presentation of baseline data, identification of key issues and establishing the SA framework;
- Section 4 – identification and assessment of options, and details of possible mitigation measures;
- Section 5 – provides details on monitoring.
1.1.5 How to comment on this report

To comment, please write to:
Policy Section,
Planning, Transportation and Leisure Services,
Tonbridge and Malling Borough Council,
Gibson Building,
Gibson Drive,
Kings Hill,
West Malling,
Kent.
ME19 4LZ.

or

e-mail ldf@tmbc.gov.uk or telephone 01732 876265

All comments should be received by Friday 18th April 2008.
2 Background

2.1 Tonbridge and Malling LDF

2.1.1 As part of the ongoing work on the Local Development Framework (LDF), Tonbridge and Malling Borough Council has prepared an Affordable Housing SPD to amplify Policies CP17 and CP19 of the adopted Core Strategy 2007. Once adopted, the Affordable Housing SPD will become a material consideration in the determination of planning applications and will provide greater detail on the provision of affordable housing within new residential developments.

2.2 SEA/SA

2.2.1 Under the requirements of the Planning and Compulsory Purchase Act 2004, Local Development Frameworks (LDFs) must undergo SA. SA involves the identification and evaluation of the impacts of Development Plan Documents (DPDs) and SPDs on economic, social and environmental objectives. The UK SA process incorporates the requirements of the European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive.

2.2.2 Under the Environmental Assessment of Plans and Programmes Regulations 2004, a Local Authority, in consultation with the statutory consultees (Natural England, English Heritage and the Environment Agency), may make a determination that if there are unlikely to be significant environmental impacts associated with the SPD, then that SEA will not be required.

2.2.3 In August 2007 a Screening Opinion was sought from the Statutory Consultees as to whether the proposed Affordable Housing SPD would generate any significant environmental impacts and therefore need to be subject to the SEA process. Natural England were the only organisation to respond during the consultation period and they determined that environmental impacts were unlikely. Additional comments were received from the Environment Agency after the close of consultation, raising concerns over potential environmental impacts of the SPD. However on consideration of the proposed content of the SPD, Tonbridge and Malling Borough Council determined that SEA would not be required. The Affordable Housing SPD will not introduce new policy but just amplifies policies in the Core Strategy which has already been subject to the full Sustainability Appraisal and SEA process. A copy of the formal determination can be found at Annex 1.

2.2.4 Despite a SEA not being required for the Affordable Housing SPD, a SA is still mandatory and a five stage approach is advocated. The stages are:
• Stage A – setting the context, objectives, establishing the baseline and deciding on the scope
• Stage B – Developing and refining options and assessing effects
• Stage C – Preparing the Sustainability Appraisal Report
• Stage D – Consulting on the draft SPD and Sustainability Appraisal Report
• Stage E – Monitoring the significant effects of implementing the SPD

2.2.5 A Scoping Report for the Core Strategy DPD was published in July 2005 and incorporated the Stage A requirements. This included the identification of the key issues in the borough, as well as establishing a SA framework of objectives and indicators and identifying other relevant plans, policies and programmes. It is the Council’s intention to make use of this established SA framework when assessing the Affordable Housing SPD.

2.3 This Report

2.3.1 This report documents stages B-D of the appraisal process. It evaluates the Affordable Housing SPD options and summarises their potential economic, social and environmental implications. It has been prepared to assist in the consideration of sustainability factors in the development of the SPD from an early stage.
3 Context & Baseline

3.1 Introduction

3.1.1 The SPD may be influenced, in various ways, by other plans, policies and programmes (PPP) on a range of scales from the international to the local level. The SA process aims to identify the key messages from these documents and highlight any synergies, opportunities and challenges they present.

3.1.2 The collection of baseline data helps identify sustainability problems within the borough and provides a basis for predicting and monitoring the effects of the SPD.

3.2 Plans, Policies and Programmes

3.2.1 During the initial PPP review carried out as part of the Core Strategy Scoping Report in 2005, a number of key messages were identified that should be taken into account in developing the LDF. In addition to those plans, policies and programmes detailed in the Scoping Report, 2005, a number of new and emerging documents have been reviewed which are of particular relevance to the Affordable Housing SPD. The key documents are:

- Planning Policy Statement (PPS) 3: Housing, November 2006
- Delivering Affordable Housing, 2006
- Draft South East Plan Regional Spatial Strategy, 2006
- Tonbridge and Malling Core Strategy DPD, 2007
3.3 Baseline data

3.3.1 As part of the Core Strategy Scoping Report, extensive baseline data was collected on a wide range of issues within the borough. This not only helped to identify key issues, but also provides a basis for predicting and monitoring the effects of the Affordable Housing SPD. In particular the Housing and Market Needs Assessment Survey (HMNAS) (2005) identified a significant shortfall between current provision of affordable housing and the identified need.

3.3.2 The HMNAS further highlighted the substantial need for smaller homes. While 75% of existing households indicated they required two or three bedroom accommodation, the requirement for one bedroom accommodation was found to be “higher (21.5%) than that found in other surveys carried out by David Couttie Associates – in which around 8% has been the average”.

3.3.3 The house price to household income ratio within Tonbridge and Malling borough is above the national average of 4.11. The average house price in 2003 was £178,325, 4.22 times the average household income. With average household incomes of £42,176 access to owner occupation is restricted, therefore resulting in increased demand for affordable units. Average property prices have risen in recent years to £265,679 in 2006.

3.3.4 Housing affordability also has potential impacts on the economy. The high cost of housing may price lower income workers out of the housing market leading to a potential shortage of key workers. This may result in increased commuting patterns by workers forced to live outside of the borough, but who need to travel into Tonbridge and Malling to work. Increased commuting has environmental consequences and can affect air quality and noise levels.

3.4 Key Issues

3.4.1 Following the review of relevant plans, policies and programmes and the base line data, the following sustainability issues relevant to the SPD have been identified.

Table 1: Sustainability Issues

| High average house prices |
| Use land efficiently, reusing previously developed land wherever possible |
| Use urban areas for housing development where possible – unless addressing particular rural needs |
| Improve housing provision – in particular affordable or key worker housing |

1http://www.jrf.org.uk/knowledge/findings/housing/024.asp
Improve the energy efficiency of new developments to mitigate and adapt to climate change

Housing should be well designed and built to a high standard

Housing should be sited in suitable locations with access to key services, jobs and infrastructure to reduce the need for long term commuting

A mix of housing should be delivered to meet a range of housing needs

### 3.5 SA Framework

3.5.1 A SA framework for Tonbridge and Malling was established in the SA Scoping Report, 2005 and was subject to extensive consultation through the Core Strategy DPD adoption process. It was based around objectives for sustainable development set out in the Integrated Regional Framework (IRF) for the South East. The Tonbridge and Malling SA framework identified 21 objectives against which DPDs and SPDs would be assessed. Table 2 presents these objectives as the SA framework for the Affordable Housing SPD. Those objectives identified in bold type are considered the most relevant.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Objective 1</strong></td>
<td>To help ensure that everyone has the opportunity to live in a decent, sustainable constructed and affordable home</td>
</tr>
<tr>
<td><strong>Objective 2</strong></td>
<td>To reduce and manage the risk of flooding and any resulting detriment to public well being, the economy and the environment</td>
</tr>
<tr>
<td><strong>Objective 3</strong></td>
<td>To improve the health and well-being of the population and reduce inequalities in health</td>
</tr>
<tr>
<td><strong>Objective 4</strong></td>
<td>To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</td>
</tr>
<tr>
<td><strong>Objective 5</strong></td>
<td>To raise educational achievement levels in the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work.</td>
</tr>
<tr>
<td><strong>Objective 6</strong></td>
<td>To reduce crime and fear of crime</td>
</tr>
<tr>
<td><strong>Objective 7</strong></td>
<td>To create and sustain vibrant communities</td>
</tr>
<tr>
<td><strong>Objective 8</strong></td>
<td>To improve accessibility for everyone to all services and facilities</td>
</tr>
<tr>
<td><strong>Objective 9</strong></td>
<td>To encourage increased engagement in cultural activity across all sections of the community</td>
</tr>
<tr>
<td><strong>Objective 10</strong></td>
<td>To improve efficiency of land use through the re-use of previously developed land and existing materials and buildings</td>
</tr>
<tr>
<td><strong>Objective 11</strong></td>
<td>To reduce air pollution and ensure air quality continues to improve</td>
</tr>
<tr>
<td><strong>Objective 12</strong></td>
<td>To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the Borough is prepared for its impacts</td>
</tr>
</tbody>
</table>
Objective 13 | To conserve and enhance biodiversity
---|---
Objective 14 | To protect, enhance and make accessible for enjoyment, the countryside and the historic environment
Objective 15 | To reduce the need to travel by car/lorry
Objective 16 | To reduce waste generation and disposal, and achieve the sustainable management of waste
Objective 17 | To maintain and improve the water quality of the Borough’s rivers, and to achieve sustainable water resource management
Objective 18 | To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough
Objective 19 | To sustain economic growth and competitiveness
Objective 20 | To encourage the development of a buoyant, sustainable tourism sector
Objective 21 | To develop and maintain a skilled workforce to support long term competitiveness

3.6 Testing the plan objectives

3.6.1 It is important that the SPD objectives are in accordance with principles of sustainability. The overall objective of the Affordable Housing SPD is to provide guidance and consistency of approach in the delivery of new affordable housing in the Borough. However there are a series of sub objectives which seek:

- to secure provision of an appropriate amount and mix of tenures to meet housing needs;
- to secure high quality design and promote energy efficiency and where practicable, renewable energy, in the provision of affordable housing;
- to ensure the tenure-blind and seamless integration of affordable housing within market housing development;
- to ensure the timely delivery of affordable housing;
- to seek the provision of housing for special needs; and
- to secure balanced residential communities.

3.6.2 Table 3 tests the Affordable Housing SPD objectives against the SA objectives. The SA guidance cautions that whilst the aim should be to achieve consistency between plan objectives, in practice there may be tensions between objectives. Where win-win outcomes cannot be achieved, the SA guidance advises that decision makers will need to determine where the priorities should lie and this should be recorded explicitly as part of the SA process.
Table 3: SPD Objectives tested against Sustainability Appraisal Objectives

<table>
<thead>
<tr>
<th>SPD Objective</th>
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</table>
4 Options Appraisal

4.1 Introduction

4.1.1 The SA guidance states that it essential to set out to improve on the situation which would exist if there were no SPD. To test this, the ‘business as usual’ option was also appraised. In this case, the ‘business as usual’ option refers to solely relying on policies CP17 and CP19 of the adopted Core Strategy to ensure the delivery of affordable housing rather than making use of an SPD.

4.1.2 Core Strategy Policies CP17 and CP19 set out the size thresholds for urban and rural sites, and the percentage of affordable housing required, along with the expected split between socially rented and intermediate housing, the consideration of an alternative policy approach is not within the scope of this SPD. Options relating to the thresholds, percentage and split of type were all considered during the SA of the Core Strategy.

4.1.3 The two options to be appraised are therefore:

- Option 1 – Business as Usual i.e. rely on the existing national and regional planning policy and local policies CP17 and CP19 on affordable housing; and
- Option 2 – Provide additional planning guidance on affordable housing by means of a SPD.

4.2 Appraisal methodology

4.2.1 Each of the options was appraised against the 21 SA objectives. Potential impacts were considered in the short, medium and long term as well as considering whether the impacts were significant, minor, no impact or uncertain. The following scoring system was used to record the impacts.

4.2.2 (It should be noted that existing housing commitments allow the necessary number of dwellings for the borough in the short term to be met. Therefore the impacts of this SPD are most likely to be felt in relation to any windfall sites coming forward and in the medium to long term.)
Table 4: Appraisal scoring system

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Likely effect against the SA objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔ ✔</td>
<td>Potentially significant beneficial impact</td>
</tr>
<tr>
<td>✔</td>
<td>Policy supports this objective although it is likely to result in only a minor beneficial impact</td>
</tr>
<tr>
<td>(√)</td>
<td>Uncertain but may result in minor beneficial impacts</td>
</tr>
<tr>
<td>~</td>
<td>Policy has no impact</td>
</tr>
<tr>
<td></td>
<td>Effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant</td>
</tr>
<tr>
<td>?</td>
<td>Uncertain or insufficient information on which to determine or base the information at this stage</td>
</tr>
<tr>
<td>(X)</td>
<td>Uncertain but may result in minor adverse impacts</td>
</tr>
<tr>
<td>X</td>
<td>Policy appears to conflict with the objective although it is likely to result in only a minor adverse impact</td>
</tr>
<tr>
<td>XX</td>
<td>Potentially significant adverse impact</td>
</tr>
</tbody>
</table>

4.3 Results

4.3.1 The results of the option appraisal is set out in Table 5 and Table 6.
Table 5 - Option 2: Policies CP17 & CP19

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Assessment</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</td>
<td>✓ ✓ ✓</td>
<td>Adopted local policy establishes a 40% target for affordable housing provision for both urban and rural areas and establishes a 70% social rented and 30% intermediate housing split which will meet a range of housing needs.</td>
</tr>
<tr>
<td>2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment.</td>
<td>~ ~ ~</td>
<td></td>
</tr>
<tr>
<td>3. To improve the health and well-being of the population and reduce inequalities in health</td>
<td>✓ ✓ ✓</td>
<td>There is a recognised link between housing quality and health. The provision of new affordable housing should support the objective.</td>
</tr>
<tr>
<td>4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</td>
<td>✓ ✓ ✓</td>
<td>Providing affordable housing is likely to make it easier for people to live within areas that can offer employment, improve integration and allow for more equal access to jobs and other facilities. Thereby supporting this objective.</td>
</tr>
<tr>
<td>5. To raise educational achievement levels in the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</td>
<td>~ ~ ~</td>
<td></td>
</tr>
<tr>
<td>6. To reduce crime and fear of crime</td>
<td>✓ ✓ ✓</td>
<td>The integration of affordable housing into mixed tenure developments may help to combat crime hotspots. Further to this, improved social inclusion and access to jobs may also have a positive impact on this objective.</td>
</tr>
</tbody>
</table>
7. To create and sustain vibrant communities (✓) (✓) (✓) Existing policy seeks to promote mixed communities and providing a mixture of housing to meet a range of needs which would help to sustain communities.

8. To improve accessibility for everyone to all services and facilities (✓) (✓) (✓) Existing policy seeks to locate new developments in urban locations to allow increased access to a range of services and facilities provided by urban centres. However development in accordance with CP19 may result in dwellings being located further away from existing services in urban areas.

9. To encourage increased engagement in cultural activity across all sections of the community (✓) (✓) (✓) Improved integration and access to services and facilities is likely to increase cultural engagement.

10. To improve efficiency in land use through the re-use of previously developed land and existing materials and buildings (✓) (✓) (✓) The integration of affordable housing into new developments may result in increased housing densities and therefore more efficient use of land. The minimum density is set out in PPS3. However development in accordance with CP19, may result in the exceptional use of Greenfield land to meet rural housing needs.

11. To reduce air pollution and ensure air quality continues to improve ~ ~ ~

12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the Borough is prepared for its impacts ~ ~ ~

13. To conserve and enhance biodiversity ~ ~ ~

14. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment ~ ~ ~
15. To reduce the need for travel by car/lorry
16. To reduce waste generation and disposal, and achieve the sustainable management of waste
17. To maintain and improve the water quality of the Borough’s rivers to achieve sustainable water resource management
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough
19. To sustain economic growth and competitiveness
20. To encourage the development of a buoyant, sustainable tourism sector
21. To develop and maintain a skilled workforce to support long term competitiveness

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<tr>
<td>19</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>20</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>21</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

Existing policy supports a mix of tenure properties. This provides housing for a mixture of workers thereby allowing the employment needs of the borough to be met. Thereby supporting economic growth.

The provision of a range of affordable housing to meet a range of housing needs allows workers to be retained in the borough rather than forcing them to seek housing elsewhere. Availability of affordable housing can act as an attraction to workers.

Summary: Overall, current policy is broadly sustainable and is likely to achieve beneficial impacts.
Table 6 - Option 1: Draft SPD

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Assessment</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</td>
<td>✔️ ✔️ ✔️</td>
<td>The SPD provides more detailed guidance on how Policies CP17 and CP19 will be implemented and provides clarification on the circumstances in which affordable housing is required. Section 3 provides detail on sheltered and supported housing, while Section 4 provides guidance on the delivery of housing as part of Rural Exception sites, thereby increasing the likelihood of ensuring the housing needs of rural areas are met. The SPD also places additional emphasis on the Code for Sustainable Homes requirements and the Kent Design SPD, thereby promoting sustainable design and construction. Therefore this SPD is expected to have a positive impact on this objective.</td>
</tr>
<tr>
<td>2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment.</td>
<td>~ ~ ~</td>
<td></td>
</tr>
<tr>
<td>3. To improve the health and well-being of the population and reduce inequalities in health</td>
<td>✔️ ✔️ ✔️</td>
<td>There is a recognised link between housing quality and health. The SPD provides guidance on affordable housing and specialist housing including sheltered accommodation. Access to specialist housing should have a positive impact on health. Therefore this SPD is expected to have a positive impact on health.</td>
</tr>
</tbody>
</table>
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest | ✓✓ | ✓✓ | ✓✓ | The SPD sets out the need for affordable housing for different sections of the community and seeks to ensure provision is not concentrated in one location. This aims to encourage integration between affordable and market housing to reduce exclusion. Therefore the SPD is likely to have a positive impact on this objective. This impact is likely to increase over time.

5. To raise educational achievement levels in the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work | ~ | ~ | ~ |

6. To reduce crime and fear of crime | ✓ | ✓ | ✓ | This SPD makes reference to all schemes achieving Secured By Design standards. Integration of affordable housing into mixed tenure developments may help to combat crime hotspots, thereby having a positive impact on this objective.

7. To create and sustain vibrant communities | ✓ | ✓ | ✓ | The SPD sets out the need to create mixed tenure communities and improve living conditions. Higher levels of social inclusion and satisfaction may have a positive impact on this objective.

8. To improve accessibility for everyone to all services and facilities | ✓ | ✓ | ✓ | By its very nature, affordable housing needs to be available to those who are unable to access market housing. Therefore this SPD does not improve access for everyone, it does seek to improve access to those who need it. It also
<table>
<thead>
<tr>
<th>Objective</th>
<th>Score</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. To encourage increased engagement in cultural activity across all sections of the community</td>
<td>✓ ✓ ✓</td>
<td>Improved integration and access to services and facilities is likely to increase cultural engagement.</td>
</tr>
<tr>
<td>10. To improve efficiency in land use through the re-use of previously developed land and existing materials and buildings</td>
<td>✓ ✓ ✓</td>
<td>The integration of affordable housing into new developments may result in increased housing densities and therefore more efficient use of land. The minimum density is set out in PPS3. However development in accordance with CP19, may result in the exceptional use of Greenfield land to meet rural housing needs. However Section 4.2 also provides further guidance on determining the need for housing in rural areas based around Core Strategy Policy CP19.</td>
</tr>
<tr>
<td>11. To reduce air pollution and ensure air quality continues to improve</td>
<td>~ ~ ~</td>
<td></td>
</tr>
<tr>
<td>12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the Borough is prepared for its impacts</td>
<td>✓ ✓ ✓</td>
<td>The SPD makes reference to the need to meet Code for Sustainable Homes Level 3 on new developments. Thereby providing guidance on addressing the causes and impacts of climate change. Therefore the SPD is likely to have a positive impact on this objective.</td>
</tr>
<tr>
<td>13. To conserve and enhance biodiversity</td>
<td>✓ ✓ ✓</td>
<td>The SPD makes reference to proposed developments demonstrating how the scheme can enhance bio-diversity through the use and</td>
</tr>
</tbody>
</table>
14. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment

15. To reduce the need for travel by car/lorry

16. To reduce waste generation and disposal, and achieve the sustainable management of waste

17. To maintain and improve the water quality of the Borough’s rivers to achieve sustainable water resource management

18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough

19. To sustain economic growth and competitiveness

20. To encourage the development of a buoyant, sustainable tourism sector

21. To develop and maintain a skilled workforce to support long term competitiveness

<table>
<thead>
<tr>
<th>Objective</th>
<th>Code</th>
<th>Kent Design</th>
<th>SPD Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>14. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment</td>
<td>~</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>15. To reduce the need for travel by car/lorry</td>
<td>~</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>16. To reduce waste generation and disposal, and achieve the sustainable management of waste</td>
<td>~</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>17. To maintain and improve the water quality of the Borough’s rivers to achieve sustainable water resource management</td>
<td>~</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>19. To sustain economic growth and competitiveness</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>20. To encourage the development of a buoyant, sustainable tourism sector</td>
<td>~</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>21. To develop and maintain a skilled workforce to support long term competitiveness</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

The SPD makes reference to the need to meet Code for Sustainable Homes Level 3 on new developments as well as referring to guidance in Kent Design. Thereby providing guidance on improving the energy efficiency of homes and promoting more efficient construction methods. Therefore the SPD is likely to have a positive impact on this objective.

Existing policy supports a mix of tenure properties. This provides housing for a mixture of workers thereby allowing the employment needs of the borough to be met. Thereby supporting economic growth.

The provision of a range of affordable housing to meet a range of housing needs including for essential and Key Workers, allows workers to be retained in the borough rather than forcing
them to seek housing elsewhere. Availability of affordable housing can act as an attraction to workers

Summary: This SPD provides a greater level of detail on how Policies CP17 and CP19 of the Core Strategy will be implemented and generally scores positively in the above appraisal.
4.4 Effects

4.4.1 No direct adverse effects were identified in the SA process. However there is potential for some adverse cumulative impacts on the landscape as a result of the development of Exception Sites for affordable housing. However, the Exceptions Site Policy (CP19) was subject to SA as part of the Core Strategy SA process and has been found to be sound.

4.5 Mitigation

4.5.1 As part of the appraisal process, a number of mitigation measures have been identified in order to reduce any adverse effects and maximise the beneficial effects of the Affordable Housing SPD. The appraisal of the SPD was an iterative process and the proposed mitigation measures and recommendations were incorporated as far as possible into revisions of the draft SPD. Table 7 details the mitigation measures put forward following the initial SA, together with any changes made to the SPD as a result.

Table 7: Proposed Mitigation Measures

<table>
<thead>
<tr>
<th>Mitigation Proposed</th>
<th>Delivery mechanism</th>
<th>Incorporated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recognition of the impact development may have on biodiversity and that loss of</td>
<td>Proposed additional wording in</td>
<td>✓</td>
</tr>
<tr>
<td>habitat should be avoided.</td>
<td>supporting text.</td>
<td></td>
</tr>
<tr>
<td>Recognition of the role of suitable and affordable housing in helping to attract</td>
<td>Proposed additional wording in</td>
<td>✓</td>
</tr>
<tr>
<td>and retain workers in the Borough.</td>
<td>supporting text.</td>
<td></td>
</tr>
</tbody>
</table>
5 Monitoring

5.1.1 Monitoring is a key part of the SA process and it seeks to monitor the significant sustainability effects of implementing the SPD. This SA process has identified that key areas for monitoring relate to the level and type of affordable housing. These issues will be monitored through the Annual Monitoring Report process via Core Strategy Core Output Indicator 2d – Affordable housing completions.
ANNEX 1

SEA Determination
Annex 1: SEA Determination
Tonbridge and Malling Borough Council Strategic Environmental Assessment (SEA) Determination November 2007

Strategic Environmental Assessment (SEA) of the Affordable Housing and Tonbridge Central Area Regeneration Fund Supplementary Planning Documents (SPDs).

Introduction

Tonbridge and Malling Borough Council identified in the April 2006 Local Development Scheme (LDS), that three SPDs would be produced. However, the 2007 LDS reduced the proposed number of SPDs to two. Therefore the Council are currently in the process of preparing the Affordable Housing and Tonbridge Central Area Regeneration Fund SPDs to supplement policies in the Core Strategy Development Plan Document (DPD) and Tonbridge Central Area Action Plan respectively. In parallel with the SPD process, work is also being undertaken in compliance with the requirements of the SEA Directive 2001/42/EC, the Environmental Assessment of Plans and Programmes Regulations 2004, and Regulation 19(5) of the Planning and Compulsory Purchase Act 2004 relating to Sustainability Appraisal (SA).

Under the requirements of the Planning and Compulsory Purchase Act 2004, Local Development Frameworks (LDFs) must undergo SA. SA involves the identification and evaluation of the impacts of DPDs and SPDs on economic, social and environmental objectives. In the UK, the SA and SEA processes are combined into a single appraisal format. This is set out in Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, 2005 (SA guidance).

Under article 9 and 11 of the Environmental Assessment of Plans and Programmes Regulations 2004, and paragraph 4.1.4 of the SA guidance, a Screening Opinion can be sought from the SEA statutory consultees (Natural England, English Heritage and the Environment Agency) to ascertain whether the proposed SPD would need to be subject to the SEA process. In August 2007, such an opinion was sought from the statutory consultees.

Table 1 sets out the screening process drawing on the criteria given in annex 1 of the SEA Regulations. This process aims to identify the likely effects on the environment arising from each of the SPDs.

Table 1: Affordable Housing SPD

<table>
<thead>
<tr>
<th>Schedule 1 criteria</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Characteristics of the plan or programme:</td>
<td></td>
</tr>
<tr>
<td>1a. The degree to which the plan or programme sets a framework for projects and other initiatives, either with regard to the location, nature, size and operating conditions or by</td>
<td>No. This SPD will amplify Core Strategy Policy CP17 setting out the framework in detail for the type and amount of affordable housing to be delivered through planning</td>
</tr>
<tr>
<td>Characteristics of the effects and the area likely to be affected</td>
<td></td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>2a. The probability, duration, frequency and reversibility of</strong></td>
<td>Once the level of affordable housing and the size and type of unit is agreed, there will be no scope for renegotiation. The agreed level of affordable housing will be legally binding through the use of formal legal agreements.</td>
</tr>
<tr>
<td><strong>the effects.</strong></td>
<td></td>
</tr>
<tr>
<td><strong>2b. The cumulative nature of the effects.</strong></td>
<td>No. These issues are already specifically addressed in the Core Strategy. Any proposals for affordable housing must comply with the sustainable development criteria set out in the relevant policies.</td>
</tr>
<tr>
<td><strong>2c. The trans-boundary nature of the effects.</strong></td>
<td>As SPD to Core Strategy Policy CP17, there should be no further trans-boundary effects than would result from the Core Strategy.</td>
</tr>
<tr>
<td><strong>2d. The risks to human health or the environment (e.g. due to accidents)</strong></td>
<td>No risks expected.</td>
</tr>
<tr>
<td><strong>2e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).</strong></td>
<td>The effects in this respect will be borough-wide as the implementation of this SPD will result in addition affordable homes for those in need, reducing overcrowding and homelessness.</td>
</tr>
<tr>
<td><strong>2f. The value and vulnerability of the area likely to be affected due to:</strong> Special natural characteristics or cultural heritage Exceed environmental quality</td>
<td>No. These issues are already specifically addressed in the Core Strategy. Any proposals for affordable housing must comply with the sustainable development criteria</td>
</tr>
</tbody>
</table>
standards or limit values
Intensive land-use

set out in the relevant policies.

2g. The effects on areas or
landscapes which have a recognised
national, Community or International
protection status.

No. These issues are already
specifically addressed in the Core
Strategy. Any proposals for
affordable housing must comply with
the sustainable development criteria
set out in the relevant policies.

Tonbridge Central Area Regeneration Fund

<table>
<thead>
<tr>
<th>Schedule 1 criteria</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Characteristics of the plan or programme:</strong></td>
<td></td>
</tr>
</tbody>
</table>
| 1a. The degree to which the plan or
programme sets a framework for
projects and other initiatives, either
with regard to the location, nature,
size and operating conditions or by
allocating resources. |
| The SPD does not directly set a
framework for projects and other
initiatives and it has no spatial focus.
It simply provides a vehicle to
generate financial contributions for
the implementation of projects and
other initiatives set out in Policy
TCA19 of the TCAAP. The
implementation of these projects and
other initiatives, however, is an
integral part of the TCAAP which
determines their location, nature, size
and operating conditions and the
allocation of resources. |
| 1b. The degree to which the plan or
programme influences other plans
and programmes including those in a
hierarchy. |
| As a guidance document, the SPD
does not influence other plans and
programmes: it simply facilitates their
implementation by the generation of
financial contributions. The SPD is
the lowest level of the hierarchy,
being informed by the Core Strategy
(Policy CP24) and the TCAAP (Policy
TCA19) respectively. |
| 1c. The relevance of the plan or
programme for the integration of
environmental considerations, in
particular with a view to promoting
sustainable development. |
| On its own, the SPD does not
integrate environmental
considerations, nor does it promote
sustainable development. The
implementation of projects and other
initiatives funded by the SPD facilitate
the integration of environmental
considerations and promote
sustainable development as informed
by the Core Strategy and the TCAAP. |
| 1d. Environmental problems relevant
to the plan or programmes. |
| There are no environmental problems
relevant to the SPD. |
| 1e. The relevance of the plan or
programme for the implementation of
Community (EU) legislation on the |
| The SPD has no relevance for the
implementation of EU environmental
legislation. |
environment (for example, plans and programmes linked to waste management or water protection)

<table>
<thead>
<tr>
<th>Characteristics of the effects and the area likely to be affected</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2a. The probability, duration, frequency and reversibility of the effects.</td>
<td>As and when planning applications are determined, the SPD provides a legally enforceable vehicle to generate financial contributions through a ring-fenced, generic formula for projects and other initiatives set out in the TCAAP. Refunds of contributions can only be made if projects are not implemented.</td>
</tr>
<tr>
<td>2b. The cumulative nature of the effects.</td>
<td>The SPD results in no cumulative effects.</td>
</tr>
<tr>
<td>2c. The trans-boundary nature of the effects.</td>
<td>Being ring-fenced to the Tonbridge Central Area, there are no trans-boundary effects of the SPD.</td>
</tr>
<tr>
<td>2d. The risks to human health or the environment (e.g. due to accidents)</td>
<td>The SPD results in no risks to human health or the environment.</td>
</tr>
<tr>
<td>2e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).</td>
<td>Being ring-fenced to the Tonbridge Central Area the geographic area and population affected by the SPD are limited and small.</td>
</tr>
<tr>
<td>2f. The value and vulnerability of the area likely to be affected due to: Special natural characteristics or cultural heritage Exceed environmental quality standards or limit values Intensive land-use</td>
<td>There is no effect to the value and vulnerability of the area to be affected as a result of the SPD.</td>
</tr>
<tr>
<td>2g. The effects on areas or landscapes which have a recognised national, Community or International protection status.</td>
<td>The SPD results in no effects on areas or landscapes which have a recognised national, EU or International protection status.</td>
</tr>
</tbody>
</table>

In response to the consultation, comments were received from Natural England and the Environment Agency (see Annex 2). Only the Environment Agency deemed that the SPDs, in particular, the Affordable Housing and Climate Change SPDs should have a Strategic Environmental Assessment.

In response, the Borough Council advised that a Climate Change SPD is no longer programmed for production – the issues will be principally addressed through the second tranche ‘Managing Development and the Environment’ Development Plan Document. In relation to the other two SPDs, the response of the Borough Council was that they will not generate significant effects on the environment because they will not introduce new policy – they will only amplify policies in Development Plan Documents (namely the Core Strategy and the Tonbridge Central Area Action Plan).
**Determination**

On the basis of this screening assessment, and on the comments received from the statutory consultees, Tonbridge and Malling Borough Council has determined that the proposed Affordable Housing SPD should not be subject to the SEA Regulations because there will be no significant environmental impacts arising from it. The SPD is a technical guidance note and supplements the existing policy framework, which itself has already been subject to SEA. The proposed SPD will be subject to SA. Copies of the responses from the statutory consultees can be found in Annex 2.

In accordance with the requirements of the regulations the statutory consultees will be notified of this determination, a copies will be made available in the Council offices and it will be place on Tonbridge and Malling Borough Council’s website.

This determination was made by the Planning and Transportation Advisory Board of Tonbridge and Malling Borough Council on 22nd October 2007, and the decision came into force on 3rd November.
ANNEX 2

Responses to SEA Screening
Responses from statutory consultees

Date: 22 August 2007
Our ref: B05/2-8/12-2
Your ref: PTLS/

Miss Jenny Mentz
Tonbridge and Malling Borough Council
Policy and Conservation
Gibson Building
Gibson Drive
Kings Hill, West Malling
Kent ME19 4LZ
By email only, no hard copy to follow

Dear Miss Mentz

Tonbridge and Malling Supplementary Planning Documents: SEA Screening Opinion

Thank you for your letter dated 1 August 2007 consulting Natural England on the SEA screening opinion in respect of the Affordable Housing, Climate Change and Tonbridge Central Area Regeneration Fund Supplementary Planning Documents.

This letter is provided as the formal response of Natural England to your request for advice or information under the Strategic Environmental Assessment Directive at the screening stage of the SEA process for these plans.

We have considered the information provided by you and given particular attention to the likely effects of the plan or programme on landscape, biodiversity, flora and fauna. We have also considered the likely effects on soil, water and landscape in so far as these are necessary to support biodiversity, flora and fauna.

In Natural England’s opinion, the plans which are the subject of this consultation are not likely to have a significant effect on landscape, biodiversity, flora and fauna within the area subject to the plans. To understand the general background to this opinion, and in order that any later or alternative versions of the plan take adequate account of biodiversity, flora and fauna, we recommend that you consult “Strategic Environmental Assessment and Biodiversity: Guidance for Practitioners” which can be downloaded from our website at www.naturalengland.org.uk.

This information is based on the information provided by you, and for the avoidance of doubt does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise.
from this or later versions of the plan which is the subject of this consultation, and which may despite SEA have adverse effects on the environment. Please do not hesitate to contact me if you have any questions about this letter.

Yours sincerely

Sean Hanna

Direct dial 01233 811213
Email sean.hanna@naturalengland.org.uk
Dear Sir/Madam

Tonbridge and Malling Supplementary Planning Documents: SEA Screening Opinion

Thank you for your letter dated 1st August 2007, consulting on the SEA screening opinion for three of your Supplementary Planning Documents. The Agency has the following comments to make:

If a SPD can be deemed unlikely to have significant environmental effects through the screening process, then an SEA is not required. In our opinion we feel that the all three SPDs could be deemed to have significant effects on the environment. However, we feel particularly strongly that the Affordable Housing and Climate Change SPDs should have a Strategic Environmental Assessment.

Yours faithfully

MRS CLAERWYN HUGHES
Technical Specialist - Planning Liaison

Direct dial 01732 223121
Direct fax 01732 223289
Direct e-mail clairewyn.hughes@environment-agency.gov.uk
Dear Mrs Claerwyn Hughes

**Tonbridge and Malling Supplementary Planning Documents (SPDs): SEA Screening Opinion**

Thank you for your letter of 28 August 2007. I apologise for the delay in my response.

The Borough Council notes your comments on the three SPDs. I would like to draw to your attention a report to the Borough Council’s Planning and Transportation Advisory Board Meeting on 22 October 2007. This report is proposing revisions to the Local Development Scheme that include deleting the Climate Change SPD and addressing the issue principally through the second tranche ‘Managing Development and the Environment’ Development Plan Document (DPD) and Kent Design. This DPD will be subject to a full Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA).

In response to your view that the remaining two SPDs (Affordable Housing and Tonbridge Regeneration Fund) will have significant effects on the environment, it is considered that this will not be the case. The two SPDs will not introduce new policy - they will only amplify policies in Development Plan Documents (namely the Core Strategy and the Tonbridge Central Area Action Plan) which themselves have been subject to a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA). Any significant environmental effects relating to the subject matter of the SPDs has already
been identified and addressed through the initial SA/SEA process of the DPD policies.

As the SPDs will only be supporting these policies no significant environmental effects will arise from their production. Should you have any further queries, please do not hesitate to contact me.

Yours sincerely

Nigel De Wit
Senior Planning Officer